HAZARDOUS WASTE MANAGEMENT PLAN

FORT GORDON

Fort Gordon Environmental Division

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2018

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Points of Contact

In Case of Emergency or Spill Call 911
For Spills in Training Areas Call Range Control Call 791-5008/5005

Hazardous Waste Management Compliance Assistance
Hazardous Waste Coordinator: 791-6127
Environmental Compliance Manager: 791-9221

Satellite Accumulation Point Inspections
Hazardous Waste Coordinator: 791-6127

Hazardous Waste Management Training
Environmental Compliance Manager: 791-9221

Hazardous Waste Management and Profiles
Hazardous Waste Support: 791-6136

Unknown Waste Analysis
Service Order Desk: 791-5220

Environmental Division Training Coordinator: 791-6278

ACRONYMS AND ABBREVIATIONS

AR	Army Regulations
BMP	Best Management Practice
CA	Contracting Authority
CDO	Command Duty Officer
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CLIN	Contact Line Item Number
DDEAMC	Dwight D. Eisenhower Army Medical Center
DLA	Defense Logistics Agency
DOD	Department of Defense
DOT	Department of Transportation
DPW	Directorate of Public Works
DRMO	Defense Reutilization and Marketing Office
DRMS	Defense Reutilization and Marketing Service
DTID	Disposal Turn-In Document
ED	Environmental Division
EMS	Environmental Management System
EO	Environmental Officer
EPA	Environmental Protection Agency
EQCC	Environmental Quality Control Committee
FSC	Federal Stock Class
GAEPD	Georgia Environmental Protection Division
GDNR	Georgia Department of Natural Resources
HAZWOPER	Hazardous Waste Operations and Emergency Response
HM	Hazardous Material
HMCP	Hazardous Material Control Point
HMTID	Hazardous Material Turned-In for Disposal
HW	Hazardous Waste
HWMP	Hazardous Waste Management Plan
HWP	Hazardous Waste Profile
IAW	In accordance with
IC	Installation Commander
IDW	Investigation Derived Waste
MEDCOM	U.S. Army Medical Command
MMR	Military Munitions Rule
NSN	National Stock Number
OSHA	Occupational Safety and Health Administration
P2	Pollution Prevention
POC	Point of Contact
PPE	Personal Protective Equipment
RCRA	Resource Conservation and Recovery Act

RQ	Reportable Quantity
SAP	Satellite Accumulation Point
SDS	Safety Data Sheet
SOP	Standard Operating Procedure
TCLP	Toxicity Characteristic Leaching Procedure
TOC	Total Organic Carbon
TSS	Total Suspended Solids
UN	United Nations
USC	U.S. Code
USEPA	U.S. Environmental Protection Agency
UW	Universal Waste
WMM	Waste Military Munitions
WSD	Waste Stream Determination

Records of Amendments

This Hazardous Waste Management Plan will be revised as necessary to reflect changes in hazardous waste generation and operations at Fort Gordon and to remain current with all applicable federal, state, and local regulations. This sheet is to be updated with each revision of this document.

Revision Number	Date	Name of Person	Initials	Reason for Amendment	Pages Affected

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Fort Gordon Hazardous Waste Management Plan
2018

1.0 Introduction.

1.1 Authority. The Resource Conservation and Recovery Act (RCRA) authorized the U.S. Environmental Protection Agency (USEPA) to implement regulations for the management of Hazardous Waste (HW) from the point of generation through final disposal. The U.S. Congress waived sovereign immunity for Department of Defense (DOD) facilities subjecting them to full regulation including assessment of fines and penalties. The USEPA granted the state of Georgia the authority to implement and enforce federal HW regulations including the identification, packaging, labeling, storing, transporting, and the treatment standards for the proper disposal of regulated waste.

Army Regulation (AR) 200-1 requires installations to develop a Hazardous Waste Management Plan (HWMP) in accordance with applicable federal, state, and local regulations.

1.2 Applicability. This HWMP provides guidance for the proper management of regulated waste by departments, tenant commands, and contractors operating aboard this installation. This HWMP meets the requirements of the USEPA and the State of Georgia; therefore, compliance with this plan ensures compliance with the regulations.

1.3 Purpose. This HWMP provides guidance for the management of regulated waste generated by all commands and contractors operating on Fort Gordon.

1.4 Applicable Regulations. Regulations mandate the procedures and requirements set forth in this plan; therefore, they are not discretionary. There is a potential for fines or criminal liability for personnel violating HW rules and regulations.

a. 40 Code of Federal Regulation (CFR) 260-268, 270, 273. The federal (e.g. USEPA) regulations that establish a "cradle-to-grave" approach for managing, storing, and disposing of HW including characterization, the manifest system, generator standards, treatment standards, and disposal requirements. These regulations also include the requirements for recycling materials, including burning material for energy and precious metal recovery.

b. 40 CFR 279. The federal USEPA regulations for the management of Used Oil and oil filters including reporting, storage, disposal, recycling by burning for energy value standards and other related requirements.

c. 40 CFR 266.200-206. The federal USEPA regulations, Waste Military Munitions (WMM) Rule, which exempts WMM from the RCRA regulations including the storage and manifest requirements when the WMM are managed under the conditions specified in this regulation.

d. 49 CFR 171-180. The US Department of Transportation (DOT) regulations for the shipping, packaging, labeling, marking, placarding of hazardous materials and waste across public highways. The DOT regulations include container design and closure specifications.

e. 49 CFR 390-397. The DOT rules that govern the qualifications of the drivers, the equipment in the vehicle, and in some cases, routing of Hazardous Material (HM) or HW shipments.

f. 40 CFR 112. The federal, USEPA, regulations governing spill containment for petroleum storage tanks and spill reporting.

g. 40 CFR 116-117. The federal, USEPA, regulations that require a release or spill of a chemical in quantities exceeding the reportable quantity (RQ) be reported to the National Response Center.

h. 40 CFR 300-302. The federal, USEPA, regulations that requires equipment that will be used in the event of a hazardous substance release to be properly maintained and contains the Listed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances and their RQ appear in Table 302.4 of 40 CFR 302.

i. Georgia Rules 391-11. The Environmental Protection Division of the Georgia Department of Natural Resource (GDNR) adopted by reference all federal regulations. The Hazardous Waste Management Act as amended in August 2002 is the bases for Georgia's hazardous waste regulations. The USEPA granted GDNR the authority to enforce environmental regulations within the State of Georgia.

2.0 Definitions.

Accumulation Date

*Accumulation Start Date in a **Ninety-day** Storage Area*

(1) The accumulation start date is the date that the first drop or item is placed into a container; **OR**
(2) The date that a container is moved from a Satellite Accumulation Point (SAP) into a 90-day storage area.

*Accumulation Start Date at a **Satellite Accumulation Point***

(1) The date for **HW** stored in a SAP is the date the total amount of HW exceeds the 55-gallon or one quart of acute HW limit; **OR**

(2) The date the **HW** is picked up for disposal if the 55-gallon is not exceeded; **OR**

(3) The date for **Universal Waste** (UW) waste is the date the first item is placed in the container.

Authorized Representative is the person responsible for the overall operation of a facility. The authorized representative is normally the commanding officer or persons of equivalent responsibility. The Commanding Officer may designate an "authorized representative" to act in their behalf.

Best Management Practices (BMP) describe practical work techniques that limit the introduction of pollutants into the environment. BMPs achieve a compromise between the environmental ideal (no pollution whatsoever) and what is realistic and practical from an economic and operational standpoint. Emphasis, however, is on the best environmental solution.

Biomedical Waste is any pathological waste, biological waste, cultures, and stock of infectious agents and associated biologicals, contaminated animal carcasses (body parts, their bedding and other wastes from such animals) sharps, chemotherapy waste, discarded medical equipment and parts, not including expendable supplies and materials, which have not been decontaminated as further defined in Rule 391-3-4-.01 of Georgia Environmental Protection Division (GAEPD).

Characterization is the process of identifying waste components, their concentrations, and the work process from which HW is generated.

Containers are any portable device in which a material is stored, transported, treated, or disposed.

Contaminant is any chemical that when present causes the waste to be regulated.

Contaminated Medium/Media means soil, sediment, surface water, groundwater, or air that contains a contaminant subject to regulations.

Contingency Plan is a document that contains an organized, planned, and coordinated course of action to be taken in case of a fire, explosion, or release of a HM/HW.

Debris is any solid material, with a diameter of 2.4 inches or larger, intended for disposal including a manufactured object, any plant or animal matter, or natural geologic material; this includes brushes, rags, rollers, personal protective equipment (PPE), large and small equipment, etc.

A manufactured object is not debris if it is a waste with specific treatment standards such as lead-acid and cadmium batteries, process residues, or intact containers of HW.

Dilution is the deliberate mixing of HW with another material for the purpose of the changing either the characteristic(s) or the concentration of a constituent in the waste. Dilution of a HW is **prohibited**.

Disposal is the process of treating a HW to render it non-hazardous or the placing of a waste into a landfill that is a permitted HW disposal facility.

Empty Container is any container that held HM/HW (except a waste that is compressed gas or an acute HW) that has had all wastes removed from it that can be removed, using all commonly employed techniques for the type of container: e.g., pouring, pumping, aspirating **AND** meet one of the following as applicable:

a. No more than 2.5 centimeters (one inch) of residue remains in the bottom of the container **OR**

b. No more than 3 percent by weight of the total capacity of the container remains in the container, if the container is less than or equal to 119 gallons in size.

A compressed gas container is empty when the pressure approaches atmospheric. Release of HW compressed gas into the atmosphere for the purpose of emptying the container is **prohibited**.

A container that held an acute HW is considered empty when the container has been triple rinsed (all rinse water must be disposed of as HW), **OR** the inner liner of the container has been removed.

EPA Hazardous Waste Codes are a specific alphanumeric sequence, assigned by the EPA, to specify type and characteristic of a HW (e.g. F001, P075, or U002)

EPA Identification Number (EPA ID) means the specific alphanumeric sequence assigned by the EPA to each HW generator, transporter, or treatment facility. The US Army Headquarters Signal Center Fort Gordon EPA ID is **GA0210020368**.

Generator is any person, by site, whose act or process first causes a waste to be subject to regulations.

Generating Unit is the unit or activity whose work process first causes a waste to be subject to regulations.

Hazardous Material is any material that because of its quality, concentration, physical, chemical or infectious characteristics, may pose a substantial hazard to human health or the environment when incorrectly used, purposefully released, or accidentally spilled.

Hazardous Waste a waste must first meet the definition of a Solid Waste (SW) if the waste is a solid waste it is a HW if it is one of the pure commercial chemical product listed in 40 CFR 261 or is the sole active ingredient of a commercial product; or if it exhibits one or more of the HW characteristics listed below:

a. *Ignitable* means a representative sample is:

(1) A liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, that has a flash point less than 140° F; **OR**

(2) A non-liquid capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes, **and** when ignited burns so vigorously and persistently that it creates a hazard; **OR**

(3) An ignitable compressed gas; **OR**

(4) An oxidizer.

b. *Corrosive* means a representative sample is:

(1) An aqueous (water) solution that has a pH equal to or less than 2.0 or equal to or greater than 12.5; **OR**

(2) A non-aqueous liquid capable of corroding steel at a rate greater than 0.25 inches per year.

c. *Reactive* means a representative sample that:

(1) Is normally unstable and readily undergoes violent change without detonating;

(2) Reacts violently with water;

(3) Forms potentially explosive mixtures with water;

(4) When mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

(5) Is a cyanide or sulfide-bearing material that, when exposed to pH conditions between 2.0 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

(6) Is capable of detonation or explosive reaction if it is subjected to a strong ignition source or is heated under confinement;

(7) Is readily capable of explosive detonation or reaction at standard temperature and pressure; **OR**

(8) Is a forbidden explosive or a Class A or Class B explosive as defined in 49 CFR 173.51, 173.53, or 173.88, respectively.

d. *Toxic* means a representative sample, analyzed per Toxic Characteristic Leaching procedure (TCLP), leaches one or more listed constituent(s) at a concentration equal to or greater than the concentration listed in 40 CFR 261.24.

Incompatible Waste are wastes that react with each other to produce heat or pressure, fire, explosion, violent reaction, toxic or flammable dusts, mists, fumes, or gases.

Inner Liner is a continuous layer of material placed inside a container that separates the container from the material stored in it.

Lamps (Light Bulbs) are the bulb or tube portion of electric lighting devices. Common UW lamps include fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide.

Land Disposal Restrictions are the regulations prohibiting the placement of waste into or upon the land.

Manifest is the EPA Form 8700-22 shipping document, originated and signed by the generator, which accompanies HW during transport and is used to track waste.

*Manifest tracking numb*er is the alphanumeric identification number pre-printed on the manifest plus the unique identification assigned by the generator for each shipment.

Mercury-Containing Equipment is any device or part of a device (excluding batteries and lamps) that contains elemental mercury. Examples include, but are not limited to, many thermostats, thermometers, and barometers.

Military Munitions means all ammunition and their components, produced or used by or for the U.S. Department of Defense or the U.S. Armed Services, for national defense and security, including military munitions under the control of the DOD, the U.S. Coast Guard, the U.S. Department of Energy (DOE) and National Guard personnel.

Non-RCRA Regulated Waste is a solid waste that does not meet the definition of a HW; however, because of its hazardous properties, it requires special storage and disposal precautions.

Pesticide is any substance or mixture intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant, or is a nitrogen stabilizer.

Point of Generation means the date and place a waste becomes subject to regulations.

Profile Sheets are the Defense Reutilization and Marketing Service (DRMS) DD-1930 or other forms used to document specific disposal information.

Representative Sample means a sample that exhibits the average properties of the waste mixture.

Solid Waste is any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant or air pollution control facility, and other discarded material; including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations, and from community and institutional activities.

Spill/Release is the accidental leaking, pumping, emitting, emptying, or dumping of solid or HW into or upon the land, surface waters, or air.

Toxic Characteristic Leachate Procedure is the analytical procedure, test 1311, as found in EPA publication SW-846, used to determine if a solid waste leaches contaminants.

Transporter is a person or entity who transports HM/HW off site over public highways.

Treatment is any method, technique, or process designed to change the physical, chemical, or biological character or composition of HW so as to neutralize, recover energy or material resources, render non-hazardous, or less hazardous, safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume.

Universal Waste (UW) are batteries, fluorescent lamps, some pesticides, and mercury-containing equipment formally classified as a HW, but that are subject to less stringent regulations, when recycled, if recycling is available. UW includes fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps; batteries; and mercury-containing equipment.

Used Oil means organic and synthetic oils, JP-8, diesel fuel marine, hydraulic oil and other oils. The term "Used Oil" does **not** include oils contaminated with solvents; oil used for degreasing, or other oil-water mixtures that are mostly water.

Waste Profiling is a method that identifies and classifies waste streams based on analytical testing and/or user knowledge of the specific process.

3.0 Responsibilities.

3.1 The Fort Gordon Installation Commander (IC), as the owner of the EPA Generator Identification Number and the permitted HW storage facility, bears the ultimate responsibility for environmental compliance and

a. Ensures the HW program receives the appropriate level of attention to ensure personnel are aware of and comply with the provisions of this plan.

b. Ensure the implementation of this HWMP.

c. Assumes on-scene command authority and overall responsibility for major spills.

d. Budgets, funds, and manages HW in full compliance with applicable substantive and procedural Federal, State, and Local HW laws and regulations, ensuring that the Environmental Division (ED) has sufficient personnel and resources.

e. Designates, in writing, the persons authorized to sign HW manifests.

f. Chairs, or appoints a chairperson, for the Environmental Quality Control Committee (EQCC).

g. Ensure the installation complies with 10 U.S. Code (USC) 2692.

3.2 The Fort Gordon Environmental Division (ED) serves as a member of the EQCC and

a. Develops, implements, updates, and distributes this Plan.

b. Serves as the principal advisor to the IC regarding environmental compliance matters, including HW management.

c. Serves as the single point of contact for all inquiries, inspections, and other actions from federal, state, and local environmental regulatory agencies.

d. Serves as the Planning, Programming, Budget, and Execution interface for installation environmental program requirements. This includes coordination, identification, and submission of environmental program requirements to obtain environmental funding.

e. Maintains a Sustainable Management System (SMS) that continually improves environmental quality in a manner consistent with regional and local objectives and targets.

f. Oversees and provides technical expertise and directions for HW management ensuring new regulations and procedures are communicated to the generating unit's Environmental Officer (EO).

g. Coordinates the development of HW spill procedures with the Fire Department and Tenant Commands, in accordance with the contingency plan.

h. Approves the purchase of HW spill response and waste handling equipment as well as reference materials.

i. Provides potential technical solutions and equipment to reduce waste generation.

j. Inspects the generating units for environmental compliance, identifies deficiencies, and ensures corrective action is initiated.

k. Reviews and performs annual waste stream determination (WSD) of existing waste streams and provides technical support to properly identify waste streams in the generating unit.

l. Completes WSD for newly identified waste streams.

m. Signs all manifest for off-site shipments of Hazardous, Non-RCRA regulated, and Universal waste.

n. Tracks HW from the point of generation through off-site disposal, i.e. "cradle to grave."

o. Ensures an installation-wide inventory of both HM/HW is maintained and that the Fire Department receives a copy of the inventory for use in emergency response.

p. Initiates replacement of HM, with either a less hazardous or non-hazardous material, when possible.

q. Reviews contracts to ensure environmental requirements are identified.

r. Compiles and submits the biennial report to the GAEPD.

s. Attends training in accordance with in accordance with DOD, EPA, DOT, and permit requirements.

t. Prepares and maintains records and reports, including HW manifests.

3.3 The Fort Gordon ED Training Coordinator

a. Develops and maintains the HW training schedule.

b. Provides training to personnel identified as HW handlers.

c. Maintains HW training records.

d. Develops classroom and on-line training, applicable to the HW handlers' functional responsibilities, in line with EPA regulations.

3.4 The Fort Gordon Fire Department

a. Responds to HM/HW incidents.

b. Ensures emergency response personnel are trained and proficient in emergency spill response.

c. Provides training as requested by ED.

d. Maintains technical library (e.g., Material Safety Data Sheets (MSDSs), chemical hazards).

e. Maintains an installation-wide HM/HW inventory provided by the Environmental Division for use in emergencies.

3.5 The Logistics Readiness Center (LRC)

a. Monitors the use of HM Installation-wide.

b. Provides ED with a quarterly report concerning HW minimization goals.

c. Provides semiannual progress reports to Fort Gordon's IC, identifying reduction in the amount or in toxicity, of HM used on the Installation.

d. Coordinates with the ED to certify which wastes meet the Federal, State, and local regulatory definition of a HW.

e. Accept compressed gas cylinders. DLA Dispositions will not accept compressed gas cylinders that are not completely empty. All activities/units shall ensure that compressed gas cylinders scheduled for turn-in as waste are completely empty. For additional information, contact the ED.

3.6 The Fort Gordon Hazardous Material Control Point (HMCP) serves as a member of the EQCC and

a. Develops a program to publicize the functions and responsibilities of HMCP.

b. Monitors and tracks installation-wide use of HM *excluding* housing and Dwight D. Eisenhower Army Medical Center (DDEAMC).

c. Approves requests for HM from departments, tenant activities, and contractors.

d. Provides MSDSs when issuing HM.

e. Maintains a system to track HM purchased.

f. Assists in HM reutilization efforts and promotes Pollution Prevention (P2) initiatives.

g. Assists the generating units with packaging and labeling of HW.

3.7 The Fort Gordon Directorate of Contracting serves as a member of the EQCC and

a. Ensures all contracts are routed through the Environmental Division if there is a potential for regulated or HW to be generated during the execution of the contract.

b. Ensures all contracts include provisions for proper waste management.

c. Provides contract support to procure equipment or services.

3.8 The Defense Logistics Agency (DLA) Dispositions

a. Operates within the guidelines promulgated by the Defense Logistics Agency (DLA) and DOD.

b. Ensures contracts are in place for the disposal and/or recycling of HW, UW, Used Oil, and other, non-RCRA, regulated waste in accordance with DOD 4160.21-M, Chapter XI and DLAM 6050.1, and in compliance with all Federal, State, and local regulations.

c. Publish disposal costs for each type of waste stream.

3.9 The Environmental Quality Control Committee (EQCC)

a. Reviews compliance and HW management procedures.

b. Recommends procedures to reduce the quantity, amount, and toxicity of the HW generated and introduce viable P2 opportunities to reduce costs.

3.10 The Directorate of Planning, Training, and Mobilization (DPTM) serves as a member of the EQCC.

3.11 The Signal Safety Division serves as a member of the EQCC and

a. Ensures Occupational Safety and Health Administration (OSHA) requirements are met for personnel managing HM/HW.

b. Ensures the implementation of this plan by incorporating this plan into the Command Safety Program and schedules routine inspections of HM storage and handling facilities.

c. Notifies the ED when environmental findings or deficiencies are identified during safety inspections.

3.12 The Dwight D. Eisenhower Army Medical Center (DDEAMC) Preventive Medicine Service performs medical monitoring of personnel working at oil and hazardous substance spill sites and

a. Maintains a biomedical waste management plan to ensure the proper handling and disposal of medical, dental, veterinary supplies, and other biomedical waste in accordance with AR 40-5, U.S. Army Medical Command (MEDCOM) Regulation 40-35, as well as Federal, State, and local regulations.

b. Receives concurrence from the ED before implementing new or revised practices that could impact waste management.

c. Provides technical information regarding the identification and characterization of waste from outlying clinics.

d. Operates a 90-day storage area in accordance with regulations and this plan.

3.13 The Generating Unit Commanders or Senior Civilian Supervisors shall retain liability for improper identification or mismanagement of waste within their command and

a. Provide senior level emphasis and a concerted effort to ensure the safe and proper management of HW.

b. Appoint, in writing, a unit EO.

c. Provide sufficient personnel and resources to ensure environmental compliance.

d. Ensure all HM (including those purchased outside standard procurement channels) is bar coded and entered into the HMCP HM tracking system.

e. Allow, at a minimum, 15 days' notice when requisitioning HM for deployment purposes.

3.14 The Generating Unit Environmental Officer

a. Ensures appointment letter is submitted to the ED.

b. Attends EO meetings.

c. Ensures unit personnel comply with this plan.

d. Develops Standard Operating Procedures (SOP), as needed, to overcome frequent turnover of personnel.

e. Ensures SAPs are managed in accordance with this plan and the SOP.

f. Ensures personnel are properly trained and that the training is documented.

g. Ensures SAP managers are trained within 6 months of assignment and that they do not work unsupervised until trained.

h. Ensures spill prevention and response procedures are in the SOP and are followed.

i. Ensures PPE is available and spill kits are maintained at all SAPs.

3.15 The Generating Unit Satellite Accumulation Points Managers

a. Ensures their SAPs are managed in accordance with this plan and the SOP.

b. Ensures that all work areas are neat, clean, and orderly at all times.

c. Ensures proper segregation of waste streams (i.e. no mixing of waste streams).

d. Ensures less than 55 gallons of HW or less than 1 quart of acute HW is stored at any one time.

e. Ensures the spill kit includes adequate supplies to contain and clean up spills.

f. Ensures containers are compatible with the material stored in them and compliant with DOT requirements.

g. Ensures containers are closed except when adding or removing waste.

h. Performs inspections, maintains records, and resolves discrepancies noted during inspections.

i. Maintains documentation including Hazardous Waste Profile Sheets, copies of turn-in documents, and training records ensuring personnel without training do not work unsupervised.

j. Ensures spills are properly reported.

4.0 Hazardous Material Management Procedures. Utilize good inventory management (e.g., use older material first, check expiration dates, order only what is required, and purchase less toxic or non-HM when possible). Excess HM in good condition with a legible label shall be turned into to the HMCP for use by other activities.

Contact the HW Program Manager or HW Handler for assistance with large amounts of excess HM that are not acceptable for turn in to the HMCP.

5.0 HW Segregation. Segregation of waste is mandatory. Proper waste segregation prevents incompatible chemicals from mixing and creating a reaction that could produce heat, pressure, fire, explosions, violent reactions, toxic dusts, mists, and irritating or toxic fumes or gases. While safety is the main concern, improper mixing may also render the subsequent mixture difficult to identify and expensive to dispose of.

Appendix A. Standard Operating Procedure for Satellite Accumulation Points (SAP)
Appendix A of this document is the SOP that shall be used at the 90-day storage area and provides clearly defined guidelines for the proper management of hazardous and other regulated waste. Enclosure A-1 is the Satellite Accumulation Point Inspection Form. Enclosure A-2 is an example of the Disposal Turn-In Document, DD Form 1348-1A.

Appendix B. Hazardous Waste-90-Day Storage Area. Appendix B of this document is the SOP that shall be used at the 90-day storage area and provides clearly defined guidelines for the proper management of hazardous and other regulated waste. Enclosure B-1 is an example of the Disposal Turn-In Document, DD Form 1348-1A. Enclosure B-2 is the 90-Day Storage Area Monthly Checklist. Enclosure B-3 is the 90-Day Storage Area Weekly Inspection Sheet and Enclosure B-4 shows examples of Labels used on base.

Appendix C. Standard Operating Procedure for Contractors. Appendix C is the SOP that shall be used by any and all Contractor(s) working at Fort Gordon and provides clearly defined responsibilities, policies, and guidelines for the proper management of hazardous and other regulated wastes. Enclosure C-1 is the Satellite Accumulation Point Inspection Form. Enclosure C-2 is the 90-Day Storage Area Monthly Checklist. Enclosure C-3 is the 90-Day Storage Area Weekly Inspection Sheet and Enclosure C-4 shows examples of Labels used on base.

Appendix D. Standard Operating Procedure for Used Oil. Appendix D is the SOP that shall be used to manage organic and synthetic oils and other petroleum products such as hydraulic fluids, lubricating oils, and diesel fuel marine under the Used Oil program. Enclosure D-1 shows an example of the Used Oil Label used on base.

Appendix E. Standard Operating Procedure for Universal Waste. Appendix E is the SOP that shall be used to manage UW and provides clearly defined guidelines for the proper management of UW including batteries, fluorescent lamps, some pesticides, and mercury-containing equipment formally classified as a HW. Enclosure E-1 shows an example of the Universal Waste Label used on base.

Appendix F. Standard Operating Procedure for the Permitted Storage Facility. Appendix F is the SOP that shall be used to manage the Permitted Facility. Enclosure F-1 is the Permitted Facility Monthly Checklist and Enclosure F-2 is the Permitted Facility Weekly Inspection Sheet.

Appendix G. Contingency Plan. Appendix G is a copy of the current Fort Gordon Contingency Plan from the RCRA Operating Permit GA0 210 020 368.

Appendix H. Waste Characterization. Appendix H is an outline of the standardized waste characterization utilized at Fort Gordon.

Appendix I. Hazardous Materials Control Point. Appendix I is the scope, mission, and purpose for the HMCP. All Hazardous Materials and Wastes generated or purchased by units and activities on Fort Gordon should be processed through the HMCP.

Fort Gordon Hazardous Waste Management Plan
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Appendix A
Standard Operating Procedure for Satellite Accumulation Points (SAP)

Additional Enclosures:
A-1: Inspection Sheet
A-2: Disposal Turn-In Document DD Form 1348-1A

Fort Gordon Hazardous Waste Management Plan
2018
Appendix A
Standard Operating Procedure for Satellite Accumulation Points (SAP)

1.0 Purpose. This Standard Operating Procedure (SOP) establishes procedures for the proper management of waste in Satellite Accumulation Points (SAP).

2.0 Satellite Accumulation Point(s). SAP shall be at or near the point of generation and under the control of the operator generating the waste. Less than 55 gallons of HW or 1 quart of acute HW may be accumulated at any one time. The 55-gallon limit includes all types of HW but does not include Universal Waste, Non-RCRA regulated waste, or Used Oil.

For example, a SAP may have a 35-gallon container for HW "X" and a 20-gallon container for HW "Y" (so 55 gallons total HW) but may **not** have a 35-gallon container for HW "X" and a 25-gallon container for HW "Y" (so 60 gallons total HW).

Generators may have more than one SAP. However, each individual SAP shall be approved by Environmental Division, have a unique identification number, and signage shall be posted that clearly delineates each individual SAP.

2.1 Signage and Equipment requirements.

a. Posted signs, available from the Environmental Division, displaying a 24-hour POC contact number and verbiage or pictograms that includes:

"SATELLITE ACCUMULATION POINT #_____"
"NO SMOKING"
"IN CASE OF EMERGENCY CALL 911"
"RCRA WASTE CODE:_____"
"WASTE STREAMS STORED AT THE SAP:_____"

b. Maintain the following equipment near each SAP

(1) Fire Extinguisher
(2) Telephone
(3) Spill Kit

2.2 Secondary Containment Requirements. Secondary containment is **not** required at SAP. However, if there is a potential for a spill to the environment, consult your EO or the Environmental Division; secondary containment may be a good BMP to implement in some cases.

2.3 Inspections. Inspections are conducted weekly using the "Satellite Accumulation Point Management Guide." Completed inspection sheets shall be kept on site for a minimum of three (3) years. This form can be found in Enclosure (A-1).

3.0 HW Segregation. Proper segregation of Hazardous Waste prevents incompatible chemicals from mixing together in a manner that could produce heat, pressure, fire, explosions, violent reactions, toxic dusts, mists and irritating or toxic fumes/gases. While safety is the main concern, improper mixing may also render the subsequent mixture difficult to identify and expensive to dispose of.

Do not mix materials where uncertainty exists.

4.0 Container Management. Waste shall be stored in DOT approved containers in good condition (i.e. minimal surface rust or dents) that are compatible with the waste stored in them.

a. Once a container is full or the 55-gallon limit is reached, **whichever occurs first**, date the label and turn the container in to the HMCP within 3 **calendar** days. Do not use Julian dates.

b. Keep containers closed and sealed except when adding or removing waste. Drums with rings shall have the ring positioned with the bolt down and tight.

c. Containers that cannot be properly sealed shall:

(1) Have the contents transferred to an appropriate size container **OR**
(2) With guidance from the Environmental Division, the container will be placed in a proportionally sized over-pack container.

d. There should be no evidence of spills (i.e. no dry or wet paint on the outside of containers, no drips or staining).

e. Ensure containers of liquids are not filled all the way to the top (i.e. leave enough "head space" to prevent heat expansion from causing the liquid to expand resulting in a spill).

5.0 Labeling. Before adding any waste, complete each label using indelible ink as set forth on the Hazardous Waste Profile including:

a. Name of the command generating the waste.
b. The contents of the drum.
c. The EPA/RCRA Waste Codes.
d. The complete proper DOT shipping name and description.

6.0 Waste Turn-In. The SAP manager or EO will coordinate the turn-in of waste with the HMCP. Turn is **by appointment only**. However**,** if an appointment cannot be scheduled within 3 calendar days, contact the Environmental Division immediately. The HMCP staff will **not** open and inspect the container's contents. It is the generating unit's responsibility to ensure the waste is properly packaged.

Using only government vehicles, deliver the waste to the HMCP 90-day storage area at the scheduled time and ensure each container has:

a. Completed Disposal Turn-in Document (DTID) DD Form 1348-1A. Review enclosure (A-2) for directions to complete the form.

b. The first time a waste is turned in, a Hazardous Waste Profile (HWP) sheet, completed by Environmental Division, shall accompany the container. For subsequent turn-ins, it only needs to be referenced on the DD Form 1348-1A.

c. The HWPs provides regulatory information. Therefore, no deviation is allowed.

Satellite Accumulation Point (SAP) Inspection Form	
Unit/Activity:	BLDG #:
SAP ID #:	Month/Year:
Primary ECC:	
Alternate ECC:	
DPWL Inspector:	

KEY: **C** = Compliance **NC** = Noncompliance **NA** = Not Applicable	STATUS
1. Containers are in good condition and free from leaks/damage	
2. Adequate spill clean-up supplies (absorbent/containers, etc.) available	
3. Emergency numbers posted by the phone	
4. Fire extinguisher available	
5. Required signage posted (No Smoking, Hazardous Waste)	
6. Containers are DOT approved	
7. Controls are in place to prevent mixing of waste streams	
8. Wastes are compatible with containers	
9. Containers are securely closed	
10. Incompatible wastes are kept in separate areas	
11. Filled containers have at least 6 inches of space left for expansion	
12. Containers have required labels	
13. Filled containers are turned-in within 72 hours	
14. Total quantity of hazardous waste less than 55-gallons/1 quart acute	
15. Aisle space/exits clear for emergency access	
16. Secondary containment is in good condition	
17. SAP is inspected weekly by ECC Primary or Alternate	
18. Containers are not located near floor drains	
19. Haz. Waste Profile sheets are up-to-date and available	
20. ECC Primary/Alternate are trained for hazardous waste management	
21. MSDSs are available for each material	

Remarks:

Waste Identification
Hazardous Waste: SAP ID, DOT Shipping Info., Quantity
Other Waste: NON-RCRA, Universal, DOT Shipping Info., Quantity

Waste Storage Layout:

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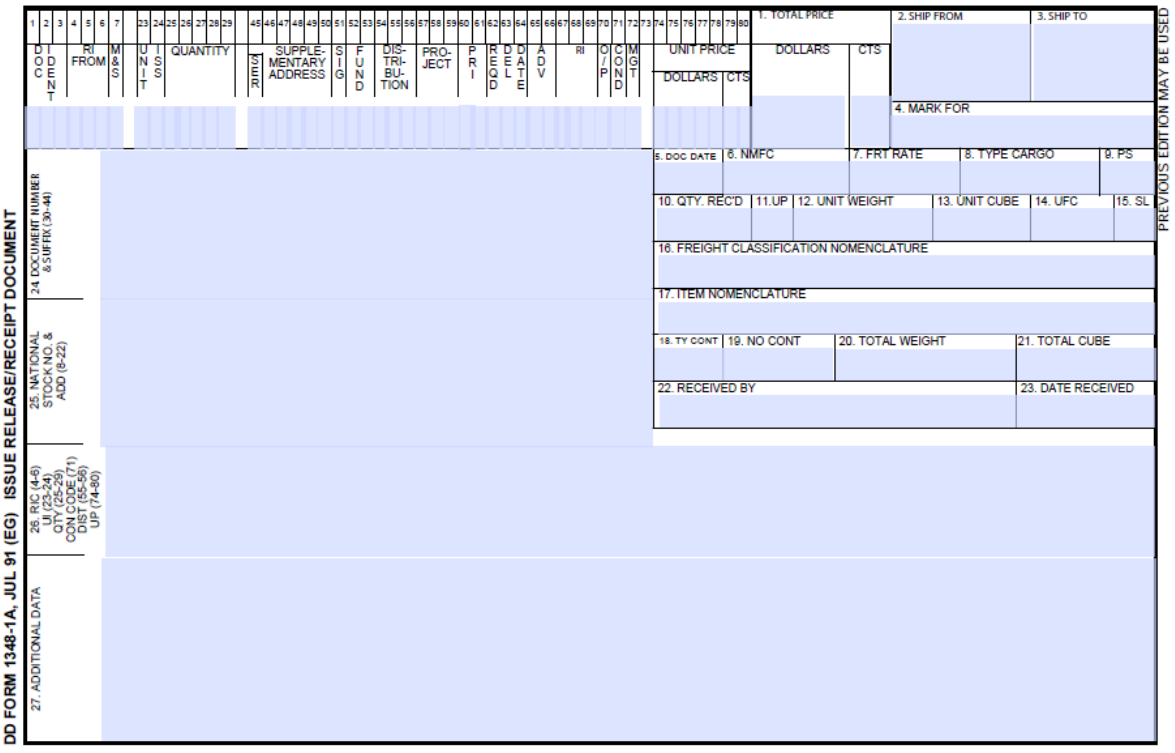
Appendix A, Enclosure A-2
Turn-in Document 1348-1A

DD Form 1348-1A shall be completed for containers of different sizes and or different wastes.

Each DD Form 1348-1/1348-1A shall include the following information:

- Block A/2 - Shipped From: Command, Building Number and Point of Contact Name, Rank, and Telephone Number/Command.
- Block B/3 - Shipped To: Fort Gordon HMCP
- Block C/4 - Marked For: HW or NON-HW or UW. Information provided by ED
- Block D - Project: DISPOSAL.
- Block X/17 - Item Nomenclature: Provided by ED
- Block 2/18 - Type of Container(s): Container size-in gallons.
- Block 8 - Inspected By and Date: Command HW Coordinator Name, Rank and phone Number.
- Block 5/19 - Number of Container(s): Quantity of same size containers.
- Block 12/5 - Date Shipped: Pick-up Date/Doc Date: Pick-up Date.
- Block FF/22 - Signature of Command HW Coordinator.
- Block GG/lower right corner - Either "KNOWN or UNKNOWN."

Form 1348-1A example



Fort Gordon Hazardous Waste Management Plan
2018
Appendix B
Standard Operating Procedure for 90-Day Storage Area

Enclosures:
B-1: Turn-In Document 1348-1A
B-2: 90-Day Storage Monthly Checklist
B-3: 90-Day Weekly Inspection Sheet
B-4: Labels

Fort Gordon Hazardous Waste Management Plan
2018
Appendix B
Standard Operating Procedure for 90-Day Storage Area

1.0 Purpose. This Standard Operating Procedure (SOP) establishes procedures for the proper management of waste in the 90-day storage areas.

2.0 Ninety-Day Storage areas. 90-day storage areas have no limit on the amount of waste that may be stored at them. However, waste may only be stored for 90days.

2.1 Waste Management. All HW generated on the Installation shall be transferred to the HM Control Center (HMCP) 90-day storage areas.

2.2 Waste Transfer Documentation**.** Only government vehicles shall be used to transport waste to the HMCC 90-day storage area or the RCRA permitted facility at scheduled times. Ensure each container is accompanied by the following:

a. Complete DD-1348-1A. The generator shall complete the form as detailed in Enclosure (B-1).
b. Hazardous Waste Profile (HWP) sheets completed by ED

2.3 Waste Receipt Documentation**.** The HMCC staff will weigh each container. However, they will **not** open and inspect the container's contents. It is the generating unit's responsibility to ensure the waste is properly packaged.

.

2.4 Container Documentation.

a. The date received.

b. Activity Name.

c. Contents.

d. EPA codes or UN Number.

e. Quantity (volume or weight).

f. HW documentation number.

3.0 Waste Management at 90-day Storage Areas. HW shall **not** be stored more than 90 days. Waste shall be transferred the permitted HWSF or off-site before the 90-day limit is exceeded.

a. Post weather resistant signs clearly visible from 50 feet on all exterior sides of the area stating

"NO SMOKING WITHIN 50 FEET"

c. Post weather resistant signs visible from a distance of 25 feet reading

"DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"
AND
"HAZARDOUS WASTE STORAGE AREA" on each entrance.

d. Control access at all times (e.g., keeps area locked unless the staff is present).

e. Label all containers using indelible ink. (See Section 3.2 for specific labeling information.)

f. Position all containers so the labels are clearly visible.

g. Store incompatible waste separately. Use berms, dikes, spill pallets, or other means to prevent incompatible materials from mixing.

h. Maintain sufficient aisle space (30 to 36 inches) around containers to allow the unobstructed movement of personnel for fire protection, spill control, and access to decontamination equipment.

i. Areas shall be clean and orderly at all times.

j. Stack drums no more than two high. Double stack only four drums per pallet.

k. A fire extinguisher and an eyewash station shall be immediately accessible and inspected monthly and the record of these inspections maintained for three (3) years.

l. An internal communication device (telephone or two-way radio) capable of summoning emergency assistance if required.

m. A spill kit shall be maintained and shall:

(1) Be clearly marked as "HW/HM SPILL KIT".

(2) Be stored in an accessible area close to the storage area.

(3) Contain material and equipment necessary to contain and clean up spills.

(4) Contain absorbent material (i.e., kitty litter or cloth absorbents), for flammable liquids use non-sparking shovel or dust pan to remove contaminated spill residue, gloves, face shields, rubber boots, etc.

(5) Contain absorbent material that is compatible with waste stored in the 90-day area.

(6) Be stocked with enough container(s) and label(s) to properly containerize and label clean up debris.

n. Rarely, a container of an unknown waste may be stored in the 90-day area until it is proper identified. Label the container as HW and annotate the label with the date the waste was discovered. Once the analysis is completed, re-label the container based on that analysis. Store unknown waste away from potentially incompatible waste.

3.1 Container Management. All containers shall be DOT approved in good condition (i.e., minimal rust or dents) and compatible with the material stored in them. For procurement information contact ED.

a. Keep containers closed in accordance with manufacturer's specifications, at all times except when adding or removing waste. A log shall be maintained of these closure specifications.

b. Containers that cannot be properly sealed shall:

(1) Have the contents transferred to an appropriate size container

OR

(2) The container shall be over packed in appropriate size container.

c. Drum rings shall be properly positioned with the bolt down and tightened.

d. Store enough empty containers to meet the needs of a spill clean up.

3.2 Container Labeling. Properly label all containers using an indelible marker.

a. HW labels shall (sample shown in Enclosure (B-5)) have the preprinted regulatory required warning with the following information annotated using indelible marker.

(1) EPA Generator ID Number.

(2) Generator's name and address.

(3) The complete proper shipping name and description.

(4) EPA Waste Codes.

(5) Accumulation Date.

b. UW shall be labeled (sample shown in Enclosure B-4) and complete the label using indelible ink:

(1) The date that waste was first added to the container.

(2) The Generating Unit's Name

(3) The contents (e.g. the types of UW in the container: batteries, lamps, mercury-containing equipment, and pesticides).

c. Non hazardous waste shall be labeled (sample shown in Enclosure B-4).

3.3 Inspections. The storage area shall be inspected once a week and each inspection documented on the inspection sheet, Enclosure B-3, and these inspections sheet shall be retained for a minimum of three (3) years.

3.4 Waste Transferred Out. HW shall be transferred to the permitted HWSF within 90 days of receipt. A copy of the original DD-1348-A and HWP shall accompany the waste to the HWSF. Waste may **NOT** be transferred from a 90-day storage area into a SAP; such a transfer is a violation of regulations and could result in a notice of non-compliance and fines.

4.0 Training Requirements. Personnel working at the 90-day facility must:

a. Attend initial Hazardous Materials Awareness Training.

b. Attend initial and annual refresher RCRA training.

c. Attend DOT initial training and annual refreshers thereafter.

5.0 <u>Contingency Plan.</u> Maintain the contingency plan and revisions thereof at each 90-day storage area. The contingency plan must be immediately reviewed and amended whenever:

a. Revision of applicable regulations.

b. The plan fails in an emergency.

c. The facility changes (i.e., its design, emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

d. The Emergency Coordinator changes.

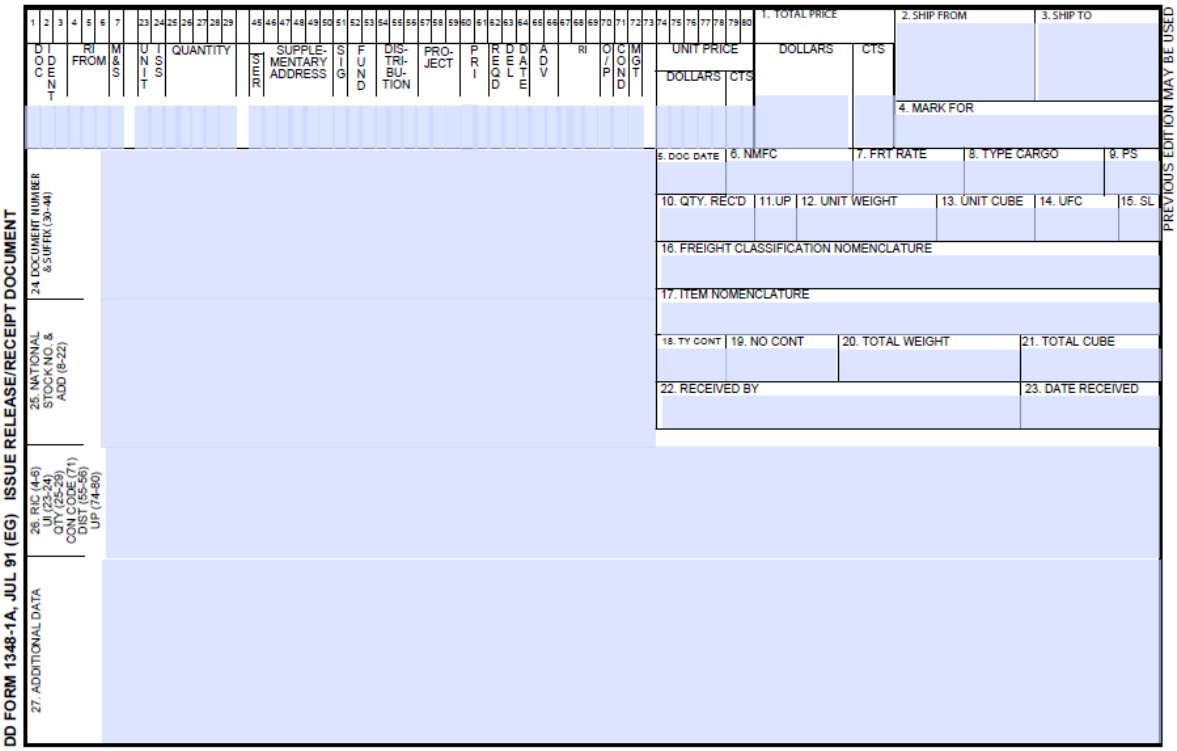
In the event of a spill to the environment, trained personnel shall make every attempt to stop and contain the spill without endangering their health and safety. Report spills to the Fire Department and follow the contingency plan.

DD Form 1348-1A shall be completed for containers of different sizes and or different wastes.

Each DD Form 1348-1/1348-1A shall include the following information:

- Block A/2 - Shipped From: Command, Building Number and Point of Contact Name, Rank, and Telephone Number/Command.
- Block B/3 - Shipped To: Fort Gordon DRMO
- Block C/4 - Marked For: HW or NON-HW or UW. Information provided by ED
- Block D - Project: DISPOSAL.
- Block X/17 - Item Nomenclature: Provided by ED
- Block 2/18 - Type of Container(s): Container size-in gallons.
- Block 8 - Inspected By and Date: Command HW Coordinator Name, Rank and phone Number.
- Block 5/19 - Number of Container(s): Quantity of same size containers.
- Block 12/5 - Date Shipped: Pick-up Date/Doc Date: Pick-up Date.
- Block FF/22 - Signature of Command HW Coordinator.
- Block GG/lower right corner - Either "KNOWN or UNKNOWN."

Form 1348-1A example



90-Day Storage Area 20__ Monthly Checklist

	Specific Item	Types of Problems	Frequency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Safety & Emergency Equipment	Fire extinguishers	Not charged, not mounted, missing	M												
	Fire alarm system	Not operating	M												
	Telephone system	Not operating	M												
	First aid equipment & supplies	Items out of stock, outdated, expired supplies	M												
Building Load / unload area	Bases or foundation, containment trenches, ramps roof, walls	Structural integrity, e.g., erosion, uneven settlement, cracks, etc.	M												

90-Day Storage Site Weekly Inspection Log

Date: _____

	Specific Item	Types of Problems	Frequency					
Safety & Emergency Equipment	Face Shield & Chemical Goggles	Broken, dirty, or missing	Weekly					
	Protective Clothing	Holes, worn, missing	Weekly					
	Absorbents (e.g., sorb-all Vermiculite)	Saturated contaminated, below minimum quantity	Weekly					
	Empty drums/containers	Corrosion, structural damage, securely stored	Weekly					
	Emergency eyewash/shower	Water pressures, leaking, flushed	Weekly					
	Ventilation Systems	Not operating, blocked	Weekly					
	Shovel (non-sparking)	Missing, damaged	Weekly					
	Non-Sparking bung wrench	Missing, damaged	Weekly					
	Push broom	Missing, damaged	Weekly					
	Warning signs	Illegible, missing	Weekly					
	Security lights	Not Operating	Weekly					
	Building doors, locks, fence, & gates	Locks missing, unlocked, signs of tampering	Weekly*					
Building Load/Unload Area	General debris & refuse	Orderliness, obstructions, general housekeeping	Weekly*					
	Odor, fumes	Detectable by smell, eye, or nose irritation	Weekly*					
	Bases or foundation, containment trenches, ramps roof, walls	Wet spots from containers, evidence of leaking	Weekly*					
Container Storage Area	Containers	Corrosion, structural defects, serious dents	Weekly*					
	Sealing of containers	Open lids, leaking contents	Weekly					
	Labeling of containers	Improper identification, date or label missing, not intact, not readable	Weekly					
	Housekeeping	Aesthetics, obstruction	Weekly*					
	Containment area coating/sealant	Cracks, worn spots, presence of accumulated liquids	Weekly*					
	Load/unload area and valves	Leaks, incorrect position, spots indicating spills	Weekly*					
	Container placement and stacking	Insufficient aisle space, heights of stacks excessive	Weekly					
	Segregation of incompatible wastes	Incompatible wastes in same area. Improper distance between barriers	Weekly					
	Pallets	Damaged (e.g., broken wood, warping, nails missing)	Weekly					
	Containment system coating/sealant	Present, cracks, worn spots, presence of liquid	Weekly*					
	Identification of storage area (rooms)	Signs posted (e.g., Flammable, Acid, Toxic)	Weekly*					
	Lighting	Bulbs missing, burned out, broken fixtures	Weekly					
Initials								

State Corrective Actions Taken : _____

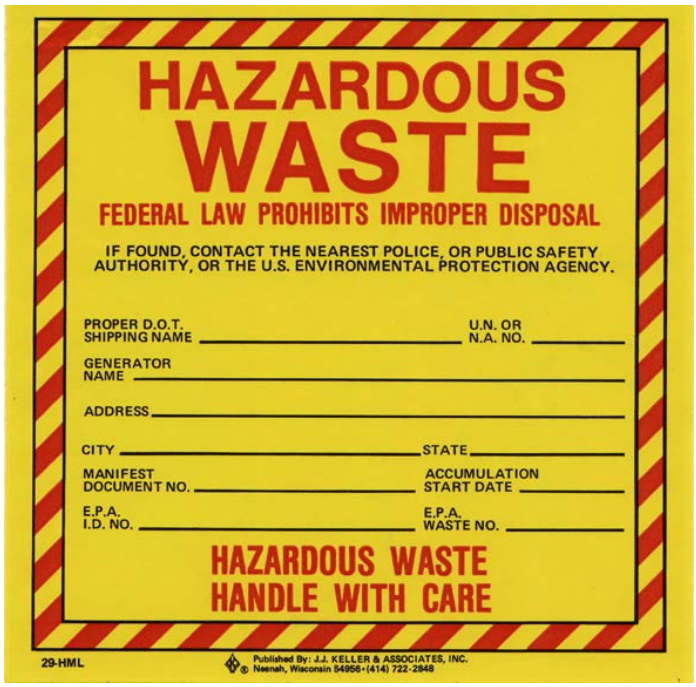
_____

_____

_____

Fort Gordon Hazardous Waste Management Plan
2018
Appendix B, Enclosure B-4
Labels

Base Hazardous Waste Label (Yellow)



Base Hazardous Waste Label

Complete the Hazardous Waste label using indelible markers:

Name…….. Generating Activity's Name
Address..…….... Building Number
City.....……..... Fort Gordon
State..... GA
Phone.....……. Generating Activity's Phone Number
EPA ID No.....…….…….. **GA0210020368** (This is the EPA ID No. for Fort Gordon)
Accumulation Start Date..... **Satellites (SAPs)**: Date the total amount of HW exceeds the 55-gallon limit or the container became full.
90-Day: The date the first waste was placed in the container.
EPA Waste Codes..... List all Waste Codes identified in the Waste Profile
Manifest Number.……..... Leave Blank - Added when the container is shipped off-site.
D.O.T. Proper Shipping Name....…. List the Shipping Name identified in the Waste Profile

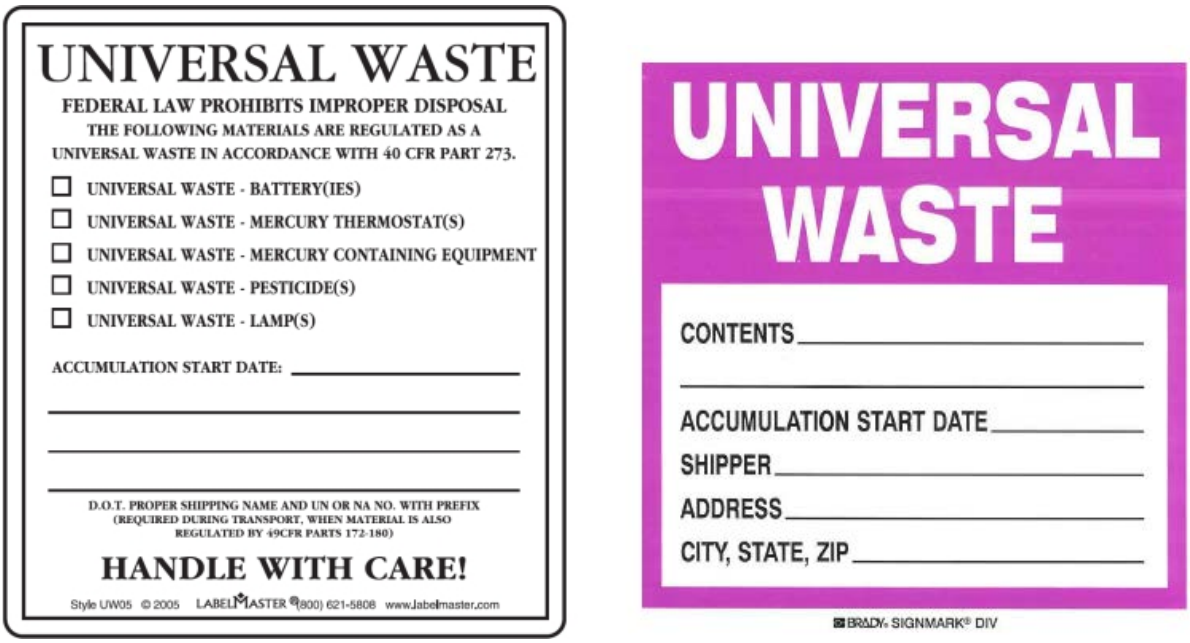
Base Nonhazardous Waste Label (Blue)

Base Non-Regulated/Non-RCRA/Non-Hazardous Waste Label

Complete the label using indelible markers:

Contents ..... List or describe container contents
Shipper ..... Generating Activity's Name
Address ..... Building number
City, State, ZIP ..... Fort Gordon, GA 30905

Base Universal Waste Label (White or Purple & White)



Base Universal Waste Label

Note: The plain white label is newer & preferred by regulators
Complete the label using indelible markers:

Contents ..... List or describe container contents or check appropriate box
Accumulation Start Date ..... Date the first drop or item of waste is placed in the container

If applicable to the label:
Shipper ..... Generating Activity's Name
Address ..... Building Number
City, State, ZIP ..... Fort Gordon, GA 30905

Fort Gordon Hazardous Waste Management Plan
2018
Appendix C
Standard Operating Procedure for Contractors

Enclosures:
C-1: SAP Inspection Form
C-2: 90-Day Storage Area Monthly Checklist
C-3: 90-Day Storage Area Weekly Inspection Sheet
C-4: Labels

1.0 Purpose. This SOP establishes procedures for the proper management of waste by contractors operating on Fort Gordon.

2.0 Definitions. A partial list of definitions is found in section 2 of this Plan and a complete list is in the regulations.

3.0 Responsibilities: The Fort Gordon Installation Commander grants access to the installation**;** therefore, any contractor who improperly manages HW or fails to comply with this instruction may be denied access.

3.1 Environmental Division. Fort Gordon Environmental Division personnel shall have immediate access to inspect contractor's work areas and shall report discrepancies to the Contracting Authority (CA).

3.2 Contracting Authorities (CA). The CA shall ensure contractors comply with federal, state, local regulations, Army and Fort Gordon instructions and

a. Provide the HWMP including this SOP to all contractors.

b. Notify Fort Gordon that a contractor will generate waste **before** HW is generated.

c. Ensure each Statement of Work (SOW) specifies proper management of HW and non-RCRA regulated wastes including the handling, storage, transportation, disposal, and require the contractor to:

(1) Provide Fort Gordon ED all necessary information to characterize waste including SDS, EPA waste codes, proper DOT shipping name, and other regulatory documentation.

(2) Identify and estimate the types and amounts of waste to be generated.

(3) Utilize a certified laboratory to complete chemical analysis when analysis is needed.

(4) Ensure proper disposal of non-RCRA regulated waste, Used Oil, and wastewater as directed by Fort Gordon's ED.

(5) Utilize best management practices to minimize the amount of waste generated.

d. Ensure the contractor establishes a line of credit or other method of reimbursement for waste disposal. **Fort Gordon is not responsible nor will it pay the cost associated with the disposal of contactor generated waste.**

e. Ensure all waste disposed of through Fort Gordon shall be handled via the permitted HWSF and disposed through DRMO.

f. Obtain approval from Fort Gordon's ED for contractor's HW storage location(s).

g. Immediately notify Fort Gordon ED if a contractor:

(1) Unexpectedly generates waste.

(2) If a regulatory violation(s) is identified.

(3) If a spill(s) to the environment occurs.

h. Provide Fort Gordon ED access to HW records.

3.3 Contractors. All contractors shall take no action or inaction that exposes the Government to liability for non-compliance or other findings or damages, penalties or fines related thereto. In the event a regulatory agency assesses either a monetary or non-monetary fine or penalty for Contractor's noncompliance; the Contractor shall reimburse the Government for all associated cost and

a. Manage HW, UW, non-RCRA regulated waste, and Used Oil in accordance with applicable federal, state, and local regulations, Army and Fort Gordon instructions including this SOP, and contractual requirements.

b. Before generating hazardous waste, obtain from Fort Gordon ED, via CA, approval for HW storage, including location and type of storage (i.e. SAP or 90-day Storage Area).

c. Immediately provide Fort Gordon personnel access to inspect locked units.

d. Inspect waste storage areas and provide, via the CA, inspection reports. Immediately correct deficiencies identified during inspections.

e. Dispose of waste via Fort Gordon HMCP, making sure to establish a line of credit with appropriate department(s) and provide information to the HMCP **before generating any HW**.

f. All Manifests for HW must be signed by approved Fort Gordon ED personnel before waste may be shipped off post.

g. Remove all HM and waste upon completion of contract. Fort Gordon ED shall dispose of any abandoned HM or waste and the HM /HW shall be managed as an unknown waste. The contractor shall bear the cost of any analytical, disposal, and other costs associated with management and disposal.

h. Contractors acknowledge that the CA shall be notified of any improper management or disposal of waste as identified by the ED.

i. Reimburse Fort Gordon for services rendered.

4.0 HW Management. HW shall be managed in accordance with federal, state, and local regulations and Fort Gordon instructions. Contact Fort Gordon ED, via the CA, regarding proper handling, storage, and/or disposal procedures.

1. It is strictly prohibited to dispose of any waste into any wastewater treatment system, oily waste treatment system, storm drain, surface waters, or upon the land without written authorization from Fort Gordon ED.

2. HW segregation is mandatory to prevent incompatible materials from mixing in a manner that could produce heat, pressure, fire, explosions, violent reactions, toxic dusts, mists, and irritating or toxic fumes/gases. While chemical compatibility and safety are the main concerns, improper mixing may render the subsequent mixture difficult to identify and expensive to dispose.

3. Containers must be compatible with the materials stored in them to prevent a reaction between the material and container.

4. Store HW only in DOT-approved containers that are in good condition, without corrosion, dents, or leaks and that are closed in accordance with manufacturer's specifications. Typically, containers are: 5, 30, or 55-gallon steel or plastic containers.

5. Ensure containers are properly labeled before adding the first drop or item to the container.

6. Items contaminated with HW are themselves HW and shall be managed accordingly. Examples include rags, rollers, brushes, and petroleum-based products contaminated with solvents.

7. Used petroleum-based products such as hydraulic fluids, lubricating oils, diesel fuel marine, JP-5, JP-8, and other organic and synthetic oils are managed as Used Oil.

8. Manage Satellite Accumulation Points (SAP) in compliance with regulations and section 4.1, as well as sections 4.3 and 4.4 of this Appendix.

9. Manage 90-day storage sites in compliance with regulations and section 4.2, as well as sections 4.3 and 4.4 of this Appendix.

10. Utilize good housekeeping practices at all times.

4.1 Satellite Accumulation Points (SAP):

a. All SAPs, must have been approved by Fort Gordon ED and shall be located at or near the point of generation and under control of the operator generating the waste.

b. All SAPs shall **not** accumulate more than 55 gallons (cumulative total of all types of HW) or 1 quart of acute HW. The 55-gallon limit does NOT include non-RCRA regulated waste, UW, or Used Oil. Once the 55-gallon limit is reached, date the container and transfer it to a HMCC's 90-day storage area within three (3) **calendar** days.

c. Completed weekly inspections, documented on the inspection sheet provided in reference (Enclosure C-1) shall be submitted to Fort Gordon ED, via the CA, no later than the close of business the following Tuesday.

4.2 Ninety Day Storage Area:

a. Fort Gordon ED shall approve any 90 day storage site before waste may be stored.

b. Control access: fence the area and keep it locked or located within a secured building.

c. Secondary containment is required for all containers**:** i.e. concrete curb or spill pallets.

d. Store incompatible wastes separately. Use berms to prevent incompatible materials from mingling with each other in the event of a spill or leak.

e. Maintain at the site a **fire extinguisher**, an **eyewash station** and an **internal communication** device (telephone or two-way radio) or system capable of summoning emergency assistance if required.

f. Post weather-resistant signs stating "**NO SMOKING WITHIN 50 FEET**" on all exterior sides of the fenced area. Each sign shall be clearly visible from 50 feet.

g. Post weather resistant signs reading **"DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"** and **"HAZARDOUS WASTE STORAGE AREA"** on each entrance. Each sign shall be clearly visible from 25 feet.

h. Maintain a readily accessible and clearly marked "HW/HM SPILL KIT" that includes at a minimum:

1. Material and equipment that is appropriate for the type(s) of waste accumulated.

2. If flammable liquids are accumulated, have absorbent (i.e., kitty litter or cloth absorbents), non-sparking shovel, or dust pan to remove contaminated spill residue, gloves, face shields, rubber boots, etc.

3. Sufficient containers and labels for potential spills.

i. Maintain sufficient aisle space (30 to 36 inches) around containers to allow for unobstructed movement of personnel for fire protection, spill control, and access to decontamination equipment.

j. Labels shall be clearly visible for inspection.

k. HW shall **not** be stored more than 90 days.

l. Completed weekly inspections, documented on the inspection sheet provided in reference (Enclosure C-2), shall be submitted to Fort Gordon ED, via the CA, for the previous week no later than the close of business the following Tuesday.

4.3 Container Management**:**

a. Containers shall be in good condition (minimal surface rust or dents are allowed), sealed, non-leaking, and compatible with the material stored in them.

b. Containers shall be closed and sealed in accordance with manufacturer's specification except when adding or removing waste.

c. Position drum rings with the bolt down and tightened.

d. Immediately transfer the contents of an un-sealable container.

e. Containers shall have **no** evidence of spills on the outside of the container (i.e., no dry or wet paint on the exterior sides).

f. **CAUTION: Use Non-Sparking Tools on Containers of Flammable Materials / Waste.**

4.4 Container Labeling**.** Properly label all containers using an indelible marker**.**

a. HW labels shall have the preprinted regulatory required warning (sample shown in Enclosure C-3) with the following information annotated in indelible marker.

(1) EPA Generator ID Number. The US Army Headquarters Signal Center Fort Gordon EPA ID is **GA0210020368**.

(2) Generator's name and address.

(3) The complete proper shipping name and description.

(4) EPA Waste Codes.

(5) Accumulation Date.

b. UW shall be labeled (sample shown in Enclosure C-3) and dated with the date when the first drop or item of waste is placed in the container and be annotated with the following in indelible ink.

(1) The Generating Unit

(2) The contents. Note, the types of UW that may be stored are: batteries, lamps, mercury-containing equipment, and pesticides.

c. Non-hazardous waste shall be labeled (sample shown in Enclosure (C-3).

Satellite Accumulation Point (SAP) Inspection Form	
Unit/Activity:	BLDG #:
SAP ID #:	Month/Year:
Primary ECC:	
Alternate ECC:	
DPWL Inspector:	

KEY: **C** = Compliance **NC** = Noncompliance **NA** = Not Applicable	STATUS
1. Containers are in good condition and free from leaks/damage	
2. Adequate spill clean-up supplies (absorbent/containers, etc.) available	
3. Emergency numbers posted by the phone	
4. Fire extinguisher available	
5. Required signage posted (No Smoking, Hazardous Waste)	
6. Containers are DOT approved	
7. Controls are in place to prevent mixing of waste streams	
8. Wastes are compatible with containers	
9. Containers are securely closed	
10. Incompatible wastes are kept in separate areas	
11. Filled containers have at least 6 inches of space left for expansion	
12. Containers have required labels	
13. Filled containers are turned-in within 72 hours	
14. Total quantity of hazardous waste less than 55-gallons/1 quart acute	
15. Aisle space/exits clear for emergency access	
16. Secondary containment is in good condition	
17. SAP is inspected weekly by ECC Primary or Alternate	
18. Containers are not located near floor drains	
19. Haz. Waste Profile sheets are up-to-date and available	
20. ECC Primary/Alternate are trained for hazardous waste management	
21. MSDSs are available for each material	

Remarks:

Waste Identification
Hazardous Waste: SAP ID, DOT Shipping Info., Quantity
Other Waste: NON-RCRA, Universal, DOT Shipping Info., Quantity

Waste Storage Layout:

90-Day Storage Area 20__ Monthly Checklist

	Specific Item	Types of Problems	Frequency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Safety & Emergency Equipment	Fire extinguishers	Not charged, not mounted, missing	M												
	Fire alarm system	Not operating	M												
	Telephone system	Not operating	M												
	First aid equipment & supplies	Items out of stock, outdated, expired supplies	M												
Building Load / unload area	Bases or foundation, containment trenches, ramps roof, walls	Structural integrity, e.g., erosion, uneven settlement, cracks, etc.	M												

90-Day Storage Site Weekly Inspection Log

Date: _____

	Specific Item	Types of Problems	Frequency					
Safety & Emergency Equipment	Face Shield & Chemical Goggles	Broken, dirty, or missing	Weekly					
	Protective Clothing	Holes, worn, missing	Weekly					
	Absorbents (e.g., sorb-all Vermiculite)	Saturated contaminated, below minimum quantity	Weekly					
	Empty drums/containers	Corrosion, structural damage, securely stored	Weekly					
	Emergency eyewash/shower	Water pressures, leaking, flushed	Weekly					
	Ventilation Systems	Not operating, blocked	Weekly					
	Shovel (non-sparking)	Missing, damaged	Weekly					
	Non-Sparking bung wrench	Missing, damaged	Weekly					
	Push broom	Missing, damaged	Weekly					
	Warning signs	Illegible, missing	Weekly					
	Security lights	Not Operating	Weekly					
	Building doors, locks, fence, & gates	Locks missing, unlocked, signs of tampering	Weekly*					
Building Load/Unload Area	General debris & refuse	Orderliness, obstructions, general housekeeping	Weekly*					
	Odor, fumes	Detectable by smell, eye, or nose irritation	Weekly*					
	Bases or foundation, containment trenches, ramps roof, walls	Wet spots from containers, evidence of leaking	Weekly*					
Container Storage Area	Containers	Corrosion, structural defects, serious dents	Weekly*					
	Sealing of containers	Open lids, leaking contents	Weekly					
	Labeling of containers	Improper identification, date or label missing, not intact, not readable	Weekly					
	Housekeeping	Aesthetics, obstruction	Weekly*					
	Containment area coating/sealant	Cracks, worn spots, presence of accumulated liquids	Weekly*					
	Load/unload area and valves	Leaks, incorrect position, spots indicating spills	Weekly*					
	Container placement and stacking	Insufficient aisle space, heights of stacks excessive	Weekly					
	Segregation of incompatible wastes	Incompatible wastes in same area. Improper distance between barriers	Weekly					
	Pallets	Damaged (e.g., broken wood, warping, nails missing)	Weekly					
	Containment system coating/sealant	Present, cracks, worn spots, presence of liquid	Weekly*					
	Identification of storage area (rooms)	Signs posted (e.g., Flammable, Acid, Toxic)	Weekly*					
	Lighting	Bulbs missing, burned out, broken fixtures	Weekly					
Initials								

State Corrective Actions Taken : _____

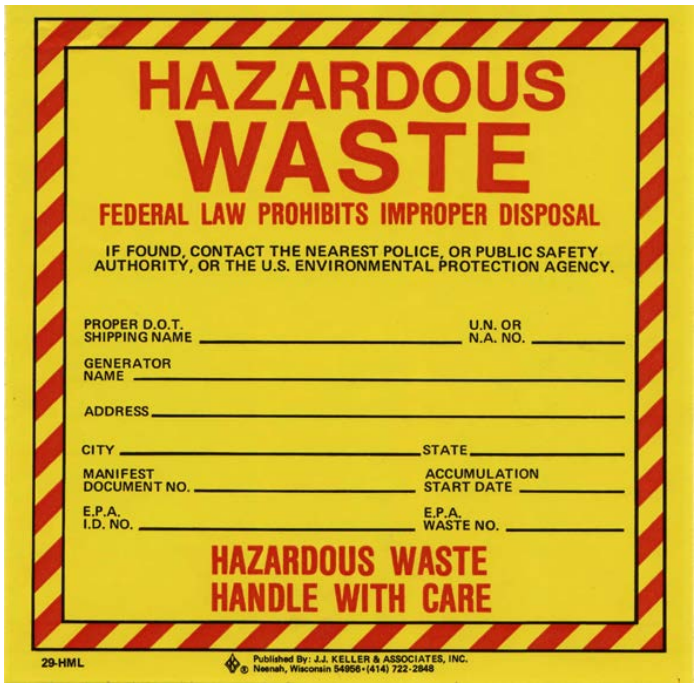
_____

_____

_____

Fort Gordon Hazardous Waste Management Plan
2018
Appendix C, Enclosure C-4
Labels

Base Hazardous Waste Label (Yellow)



Base Hazardous Waste Label

Complete the Hazardous Waste label using indelible markers:

Name…….. Generating Activity's Name
Address..…….... Building Number
City.....……..... Fort Gordon
State..... GA
Phone.....……. Generating Activity's Phone Number
EPA ID No.....……..…….. **GA0210020368** (This is the EPA ID No. for Fort Gordon)
Accumulation Start Date..... **Satellites (SAPs)**: Date the total amount of HW exceeds the 55-gallon limit or the container became full.
90-Day: The date the first waste was placed in the container.
EPA Waste Codes..... List all Waste Codes identified in the Waste Profile
Manifest Number.……..... Leave Blank - Added when the container is shipped off-site.
D.O.T. Proper Shipping Name....…. List the Shipping Name identified in the Waste Profile

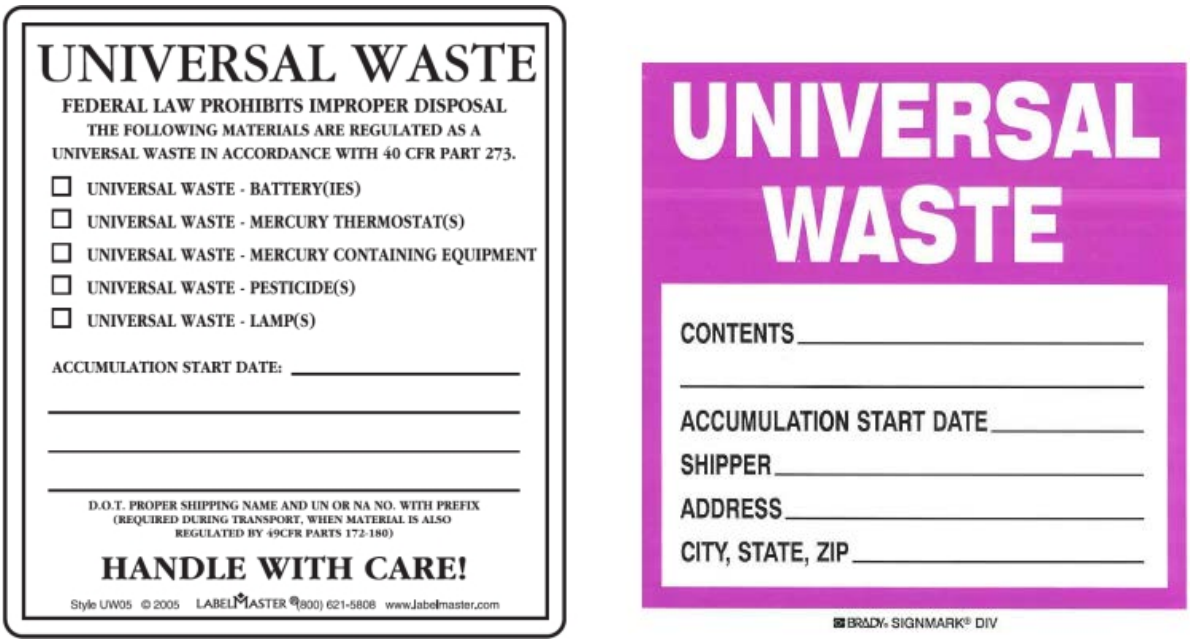
Base Nonhazardous Waste Label (Blue)

Base Non-Regulated/Non-RCRA/Non-Hazardous Waste Label

Complete the label using indelible markers:

Contents ..... List or describe container contents
Shipper ..... Generating Activity's Name
Address ..... Building number
City, State, ZIP ..... Fort Gordon, GA 30905

Base Universal Waste Label (White or Purple & White)



Base Universal Waste Label

Note: The plain white label is newer & preferred by regulators
Complete the label using indelible markers:

Contents ..... List or describe container contents or check appropriate box
Accumulation Start Date ..... Date the first drop or item of waste is placed in the container

If applicable to the label:
Shipper ..... Generating Activity's Name
Address ..... Building Number
City, State, ZIP ..... Fort Gordon, GA 30905

Fort Gordon Hazardous Waste Management Plan
2018
Appendix D
Standard Operating Procedure for Used Oil

Additional Enclosures:
D-1: Used Oil Label

Fort Gordon Hazardous Waste Management Plan
2018
Appendix D
Standard Operating Procedure for Used Oil

1.0 Purpose. This SOP establishes procedures for the proper management of Used Oil.

2.0 Definitions. A short list of definitions is provided for a quick reference. A complete list of definitions is found in the regulations.

Aboveground Storage Tanks (AST) are any one or combination of tanks that are less than 10% underground, by volume, and are used to store or process used oil.

Container means any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled.

Generator is any person, by site, whose act or process first causes a waste to be subject to regulations.

Spill/Release is the accidental leaking, pumping, emitting, emptying, or dumping of solid or HW into or upon any land or surface waters.

Used Oil means organic and synthetic oils, JP-8, diesel fuel marine, hydraulic fluids, and other oils. The term "Used Oil" does **not** include oils contaminated with solvents; oil used for degreasing, or other oil-water mixtures that are mostly water.

3.0 Responsibilities.

3.1 Fort Gordon ED provides technical guidance to ensure compliance with regulations and Army policies, this SOP, and also

a. Inspects work areas and reports all discrepancies to the appropriate athorities.

b. Upon request, provides Used Oil Recycling and disposal services.

3.2 Commanding Officers, Officers-In-Charge, and Department Heads shall retain liability for any improper identification or mismanagement of waste or Used Oil within their command.

3.3 Contracting Authorities shall ensure their contractors, who generate Used Oil, are aware of and comply with Fort Gordon's HWMP including this SOP. Contracting Authorities shall also

a. Notify Fort Gordon ED when a contactor has the potential to generate Used Oil.

b. Ensure Fort Gordon ED approves the location where Used Oil may be stored.

c. Immediately notify Fort Gordon ED of any regulatory violations or spills.

3.4 Used Oil Generators shall manage Used Oil in accordance with applicable federal, state, and local regulations as well as Army and Fort Gordon procedures and

a. Ensure Fort Gordon ED approves of the Used Oil storage area.

b. Provide Fort Gordon ED access to inspect locked facilities and waste records.

c. Immediately correct deficiencies identified by Fort Gordon ED or other inspectors.

4.0 Used Oil Management. Regulations prohibit the disposal of Used Oil into any sanitary sewer, wastewater treatment system, storm drain, surface water, or onto the land without written permission from Fort Gordon. Used Oil shall not be used as a dust suppressant or any other application to the ground.

a. Proper segregation of Used Oil prevents incompatible chemicals from mixing that could produce heat, pressure, fire, explosions, violent reactions, toxic dust, mists, and irritating or toxic fumes or gases.

(1) Do not mix Used Oil with solvents; the resulting mixture may be HW.

(2) Do not mix Used Oil with HW; the resulting mixture may be HW.

(3) Do not mix Used Oil with anything that could prevent it from being recycled.

(4) Do not mix Used Oil with gasoline.

b. Used Oil may be mixed with some fuels: Diesel, JP-5, and JP-8.

c. Only store Used Oil in an approved AST or in DOT-approved containers that are in good condition (minor corrosion or dents are allowed) and non-leaking.

d. Label all containers and AST's with the words "Used Oil". Label all buckets and drip pans used to collect and store Used Oil with the words "Used Oil."

e. All containers and AST's shall be closed and sealed to prevent spills.

f. Secondary containment is required for all AST's and Used Oil containers stored outside.

g. Contact Fort Gordon DRMO to arrange for disposal of Used Oil.

5.0 Spills and Releases. If Used Oil is spilling or has spilled, trained personnel shall make every effort to stop and contain the spill, without endangering their safety.

Report all spills of Used Oil to the Fort Gordon Fire Department and the Environmental Division

Fort Gordon Hazardous Waste Management Plan
2018
Appendix D, Enclosure D-1
Used Oil Label

Base Used Oil Label (Black and White)

Complete the Used Oil label using indelible markers

Enclosure:
(E-1) Universal Waste Label

1.0 Purpose. This SOP establishes procedures for the management of Universal Waste (UW).

2.0 Definitions. A short list of definitions is provided for a quick reference. A complete list of definitions is found in the regulations.

Accumulation Start Date for UW is the date the first item it placed in the container.

Mercury-Containing Equipment is any device or part thereof (excluding batteries and lamps) that contains elemental mercury.

Pesticide is any substance or mixture intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant.

Universal Waste (UW) are batteries, fluorescent lamps, some pesticides, and mercury-containing devices formally classified as a HW, but that are subject to less stringent regulations, when recycled if recycling is available. UW includes fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps; batteries; and mercury devices.

3.0 Universal Waste Management. UW may be stored for up to one (1) year from the date the first piece/item of waste is placed in the container. To avoid storing UW for more than one (1) year, contact Fort Gordon ED when a container is **eight months old** to arrange for disposal.

3.1 Battery Management.

3.1.1 **Lead Acid Batteries.** Store batteries (car type batteries) to prevent a spill. Broken batteries (i.e. breached casing) must managed as HW including any spilled acid.

3.1.2 **Non Lead Acid Batteries.** (i.e. Nickel Cadmium, Nickel Halide, Magnesium, Lithium, Mercury, Alkaline, etc)

a. Segregate by type into proportionately sized containers (e.g. only one type per container).

b. Tape both terminals (i.e. the "ends" of each battery) or seal each battery in an indiviual plastic bag. This is **not** applicable to alkaline batteries.

c. Label as UW and annotate the date the first battery was placed in the container. (Example shown in Enclosure (E-1).

3.2 Fluorescent Lamps Management. Store unbroken lamps in labeled, closed containers. The original box or a two- or three-ply cardboard box may be used.

a. Label and date all containers (boxes) as UW when the first lamp is added. (Example shown in Enclosure (E-1).

b. Place **broken** lamps in a DOT approved closed container and label as **HW**.

3.3 Mercury-Containing Devices Management. Place mercury-containing devices into a closed, DOT approved container.

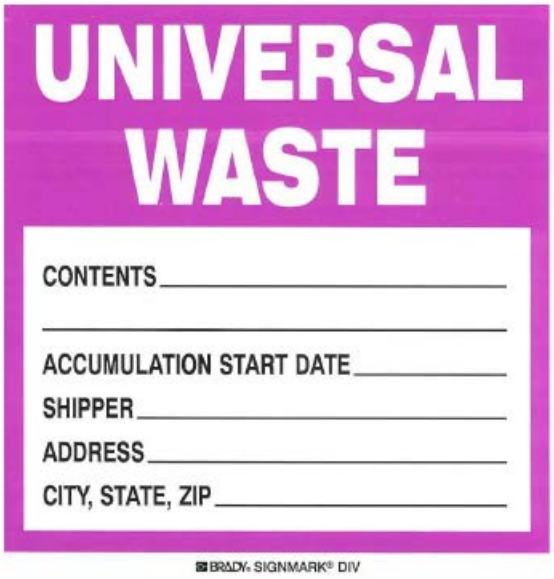
a. Devices where the mercury is not in a sealed ampule, the mercury must be inside sealed air-tight casing.

b. Label as UW and date the label using indelible ink. (Example shown in Enclosure (E-1).

3.4 Pesticides Management. Store pesticides in a closed DOT approved containers. Label and date containers as UW.

4.0 UW Turn-In. Contact Fort Gordon ED or HMCP to schedule a turn-in when a container is full or when the container has been storing UW for **eight months**.

Base Universal Waste Label (White or Purple & White)



Base Universal Waste Label

Note: The plain white label is newer & preferred by regulators
Complete the label using indelible markers:

Contents ..... List or describe container contents or check appropriate box
Accumulation Start Date ..... Date the first drop or item of waste is placed in the container

If applicable to the label:
Shipper ..... Generating Activity's Name
Address ..... Building Number
City, State, ZIP ..... Fort Gordon, GA 30905

Fort Gordon Hazardous Waste Management Plan
2018
Appendix F
Standard Operating Procedure for Permitted Facility

Additional Enclosures:
F-1: Permitted Facility Monthly Checklist
F-2: Permitted Facility Weekly Inspection Sheet

1.0 Purpose. This SOP establishes procedures for the management of the Permitted Storage Facility.

2.0 Definitions. A short list of definitions is provided in this Appendix for quick reference. A more extensive list of definitions can be found in section 2 of the Fort Gordon Hazardous Waste Management Plan and a complete list of definitions is found in the regulations.

Accumulation Start Date for UW is the date the first item it placed in the container.

EPA Hazardous Waste Codes are specific alphanumeric sequence assigned by the EPA to specify type and character of a HW.

EPA Identification Number (EPA ID) means the number assigned by the EPA to each HW generator, transporter, or treatment facility.

3.0 Permitted Facility. The facility will be operated in accordance with the RCRA Part B Permit as outlined in the Part B Permit application.

Permitted Facility 20__ Monthly Checklist

	Specific Item	Types of Problems	Frequency	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Safety & Emergency Equipment	Fire extinguishers	Not charged, not mounted, missing	M												
	Fire alarm system	Not operating	M												
	Telephone system	Not operating	M												
	First aid equipment & supplies	Items out of stock, outdated, expired supplies	M												
Building Load / unload area	Bases or foundation, containment trenches, ramps roof, walls	Structural integrity, e.g., erosion, uneven settlement, cracks, etc.	M												

Permitted Facility Weekly Inspection Log

DATE:_____

	Specific Item	Types of Problems	Frequency					
Safety & Emergency Equipment	Face Shield & Chemical Goggles	Broken, dirty, or missing	Weekly					
	Protective Clothing	Holes, worn, missing	Weekly					
	Absorbents (e.g., sorb-all Vermiculite)	Saturated contaminated, below minimum quantity	Weekly					
	Empty drums/containers	Corrosion, structural damage, securely stored	Weekly					
	Emergency eyewash/shower	Water pressures, leaking, flushed	Weekly					
	Ventilation Systems	Not operating, blocked	Weekly					
	Shovel (non-sparking)	Missing, damaged	Weekly					
	Non-Sparking bung wrench	Missing, damaged	Weekly					
	Push broom	Missing, damaged	Weekly					
	Warning signs	Illegible, missing	Weekly					
	Security lights	Not Operating	Weekly					
	Building doors, locks, fence, & gates	Locks missing, unlocked, signs of tampering	Weekly*					
Building Load/Unload Area	General debris & refuse	Orderliness, obstructions, general housekeeping	Weekly*					
	Odor, fumes	Detectable by smell, eye, or nose irritation	Weekly*					
	Bases or foundation, containment trenches, ramps roof, walls	Wet spots from containers, evidence of leaking	Weekly*					
Container Storage Area	Containers	Corrosion, structural defects, serious dents	Weekly*					
	Sealing of containers	Open lids, leaking contents	Weekly					
	Labeling of containers	Improper identification, date or label missing, not intact, not readable	Weekly					
	Housekeeping	Aesthetics, obstruction	Weekly*					
	Containment area coating/sealant	Cracks, worn spots, presence of accumulated liquids	Weekly*					
	Load/unload area and valves	Leaks, incorrect position, spots indicating spills	Weekly*					
	Container placement and stacking	Insufficient aisle space, heights of stacks excessive	Weekly					
	Segregation of incompatible wastes	Incompatible wastes in same area. Improper distance between barriers	Weekly					
	Pallets	Damaged (e.g., broken wood, warping, nails missing)	Weekly					
	Containment system coating/sealant	Present, cracks, worn spots, presence of liquid	Weekly*					
	Identification of storage area (rooms)	Signs posted (e.g., Flammable, Acid, Toxic)	Weekly*					
	Lighting	Bulbs missing, burned out, broken fixtures	Weekly					
Initials								

State Corrective Actions Taken : _____

_____

_____

_____

Fort Gordon Hazardous Waste Management Plan
2018
Appendix G
Contingency Plan

1.0 <u>Purpose.</u> This section contains a copy of the Contingency Plan contained in the RCRA Operating Permit GA0 210 020 368 for U.S. Army Signal Center and Fort Gordon, GA. It is Section G of that Permit.

SECTION G – CONTINGENCY PLAN

The information contained in this section is submitted in accordance with the permit application requirement in 40 CFR 270.14(b)(7) to include a copy of the Contingency Plan that is required by 40 CFR 264, Subpart D.

G-1 General Information [40 CFR 270.14(b)(7)]

Fort Gordon is located near the east-central portion of the State of Georgia, approximately nine miles southwest of Augusta, Georgia, and occupies approximately 56,000 acres. Portions of the fort are located in Richmond, Jefferson, Columbia, and McDuffie counties; the major portion of the fort is located in Richmond County.

This Contingency Plan pertains to the HWSF, Building 10701, located in a fenced compound at 10th Street and Barnes Avenue on Fort Gordon, Georgia. The occupied areas of the post, including the HWSF, are shown on Figure B-1, Fort Gordon, Cantonment Area Map. The facility is owned and operated by the United States Army.

Fort Gordon stores only containerized waste in the HWSF. Examples of containers, which may be used at the HWSF are listed on Table D-1 of Section D. The maximum storage capacity of the HWSF is 19,400 gal. Figure G-1 shows the general HWSF floor plan. A list of the wastes permitted for storage at the HWSF is provided in Table C-1. The HWSF contains two individual storage bays and three closets. All storage areas are separated by berms to reduce the potential of mixing incompatible wastes.

The Contingency Plan may also be used in the event of a spill or other emergency situation at an SAP or a 90-day Storage Area.

G-2 Emergency Coordinators [40 CFR 270.14(b)(7), 264.52(d) and 264.55]

For spills and other emergency situations at Fort Gordon, the Installation On-Scene Coordinator (IOSC) will direct the Spill Task Force (STF) members as necessary to effectively clean up the spill. The Director of Emergency Services (DES) acts as the Primary IOSC (also known as the Emergency Coordinator). A list of Emergency Coordinators is shown in Table G-1.

Table G-1. Emergency Coordinators.

Contract Order	Name Response Time	Position Title	Work Address	Phone
1 Primary	Lt Col Jason D. Czar 25 minutes	Director of Emergency Services	IMGO-ES, Bldg. 32422	Work: 706-791-2705 Home: 687-899-2973 Cell: 706-831-9128
2 Alternate	Lester Porter 5 minutes	Chief, Fire & Emergency Services Div.	IMGO-ES, Bldg. 32420	Work: 706-791-1201 Home: 706-868-7844 Cell: 706-691-7388
3 Alternate	John Ramey 30-40 minutes	Director of Public Works	IMGO-PW Bldg. 14500	Work: 706-791-3225 Home: 706-814-7040
4 Alternate	Robert Drumm 30 minutes	Chief, Environmental Division, DPW	IMGO-PWE Bldg. 14600	Work: 706-791-6374 Home: 706-556-8721 Cell: 706-840-5153
5 Alternate	George Conrad 30 minutes	Chief, Signal Safety Division	IMGO-PS, Bldg. 33720	Work: 706-791-4721 Home Cell: 706-726-8098
6 Alternate	Lt Col Wendy Miklos 30 minutes	Chief, Preventative Medicine Service	Bldg. 38701	Work: 706-787-1190 Home Cell: 253-961-0698
7	Emergency Operations Center	Not Applicable	-	706-791-2019

At all times, there will be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This Emergency Coordinator will be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, this person will have the authority to commit the resources needed to carry out the contingency plan.

G-3 Implementation Plan [40 CFR 270.14(b)(7), 264.52(a) and 264.56(d)]

The decision to implement the contingency plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of the section is to provide guidance to the IOSC in making this decision by providing decision-making criteria.

In the event of an emergency situation involving hazardous materials or hazardous waste, the discoverer will immediately notify the IOSC. If the discoverer is working in or near the HWSF, the emergency bell may be activated. The IOSC will determine which STF members are needed based on the supervisor's information and will contact the individuals needed to report to the scene. All members that are dispatched will coordinate their activities with the IOSC.

The IOSC will evaluate the impact of a spill, determine if it is reportable, and determine the containment, countermeasures, clean up and disposal actions required. It is also the responsibility of the IOSC to determine if spilled products are recoverable, to ensure that spill sampling is accomplished, and to maintain records of the incident.

The STF, under the direction of the IOSC, will conduct containment and countermeasures, clean up and disposal, and restoration actions as required to minimize the environmental impact of a spill.

The contingency plan will be implemented in the following situations:

1. Fire and/or Explosion

    a. A fire causes the release of toxic vapors

    b. The fire spreads and could possible ignite materials at other locations on-site or could cause heat-induced explosions

    c. The fire could possibly spread to off-site areas

    d. Use of water or water and chemical fire suppressant could result in contaminated run-off

    e. An imminent danger exists that an explosion could ignite other hazardous waste at the facility

    f. An imminent danger exists that an explosion would result in the release of toxic material.

2. Spills or Material Release

    a. The spill could result in the release of flammable liquids or vapors, thus causing a fire or gas explosion hazard

    b. The spill could cause the release of toxic liquid or vapors

    c. The spill can be contained on-site, but the potential exists for ground-water contamination

d. The spill cannot be contained on–site, resulting in off-site soil contamination and/or ground or surface water pollution.

3. Floods

a. The potential exists for surface water contamination.

G-4 Emergency Actions [40 CFR 270.14(b)(7) and 264.56]

Emergency actions including notification, hazard assessment and control procedures are discussed in G-4a through G-4m.

G-4a Notification [40 CFR 270.14(b)(7), 264.56(a)]

In the event of an emergency situation, the discoverer will notify the IOSC by calling the appropriate number shown in Table G-1. The IOSC will then notify the STF by calling 911. The IOSC is responsible to determine if base personnel must be notified and to activate internal facility alarms and/or communication systems.

The IOSC is also responsible for notifying appropriate State or local agencies with designated response roles if their help is needed. A list of local Fire Departments available to respond in the event of the emergency is summarized on Table G-2. Off-post notification will initially be made by the Environmental Division to IMCOM Southeast at (404) 436-0773. State and federal agencies are shown in Table G-3.

Table G-2. Local Fire Departments.

Fire Department	Direct Dial Phone Number
Grovetown*	(706) 863-2354
Augusta-Richmond County	(706) 821-2909
Harlem	(706) 541-4131
* NOTE: The Grovetown Fire Department is called first in the event of an emergency that cannot be handled by the Fort Gordon Fire Department.	

Table G-3. State and Federal Emergency Contacts.

State/Federal Contacts	Number
Georgia Department of Natural Resources (GADNR)	(800) 241-4113 (404) 656-4300
EPA, Region IV	(404) 347-3931/3932
National Response Center	(800) 424-8802
IMCOM, SE	404-464-0773
EPA, Region IV Toxic Division for PCB Spills	(404) 257-3621
Richmond County Local Emergency Planning Committee	(706) 821-1210/2900

G-4b Identification of Hazardous Materials [40 CFR 270.14(b)(7) and 264.56(b)]

The Emergency Coordinator will immediately identify the character, exact source, amount, and area/extent of the release. The label and recorded data in the HWSF inventory should provide adequate identification of the material or waste released. If, for some reason, the released material cannot be identified by visual observation, samples will be taken for chemical analysis. The emergency coordinator is responsible for ensuring samples of unidentifiable wastes are obtained as expeditiously as possible and that those samples are sent to an appropriate environmental lab.

G-4c Hazard Assessment [40 CFR 270.14(b)(7) and 264.56(c) and (d)]

The IOSC will assess possible direct and indirect hazards to human health or to the environment that may result from a chemical release, fire, or explosion. Upon initial discovery of a release of a hazardous material, hazardous waste, or suspected hazardous material or hazardous waste the senior employee present at the time of the spill will function as the initial emergency coordinator and will initiate the Spill Response. If the spill occurred when no one was present, the individual discovering the spill is the initial emergency coordinator and is responsible for initiating the Spill Response. Spill Response is initiated by calling the Fire Department at extension 911 regardless of the size of the spill. Assessment is made by the first responder utilizing sampling and testing to determine what was spilled and proper procedures to follow.

The emergency coordinator will ensure the immediate safety of the Fort Gordon personnel involved in the spill response and the surrounding population that might be impacted by the spill. Safety precautions can include restricting access to the area, use of personal protective equipment, and evacuation of the area.

G-4d Control Procedures [40 CFR 270.14(b)(7) and 264.52(a)]

The initial response to any emergency will be to protect human health and safety and then the environment. Identification, containment, treatment, and disposal assessment will be the secondary response.

1. Fire and/or Explosion

The HWSF is accessible by fire-fighting and other emergency vehicles and equipment. The Fort Gordon Fire Department is available 24 hours a day to respond to any emergency. Fire Station #1, Building 32420 is located on Avenue of the States and Fire Station #2, Building 13803 is located on 13th Street (Figure B-1).

In the event of a fire and/or explosion involving hazardous materials, the following actions will be taken:

a. The supervisor of the area where incident occurred will notify the IOSC and Spill Task Force

b. All doors in the HWSF will be closed

c. Remove or isolate containers if possible

d. Work in all areas will immediately cease

e. Proper use and activation of fire control systems and equipment (sprinkler system and fire extinguishers)

f. All personnel not actively fighting the fire will be evacuated according to the instructions from the IOSC

g. All injured persons will be transferred to medical facilities for treatment.

If a highly flammable material is released, the following action will be taken:

a. All persons within a 1/4–mile radius will be notified if deemed necessary by the Fire Chief

b. All ignition sources will be eliminated

c. Motor vehicles will be restricted or eliminated to avoid ignition of the vapor

d. All persons within a 2,000-ft radius of the source will be evacuated if the likelihood of an impending explosion is determined.

The Fort Gordon Fire Chief will determine when the fire has been controlled and consult with the STF and IOSC to determine when activities in the area can resume.

2. Release of Hazardous Waste to Air, Land, or Water

The IOSC, in conjunction with STF members, will initiate immediate action to eliminate possible fire hazards, assess the severity of the spill, and evaluate the necessity of activating various STF members.

The IOSC will obtain the following information in order to assess the magnitude and potential seriousness of the spill or release:

a. Time and type of incident (e.g., release, fire)

b. Name and quantity of material(s) involved, to the extent known and the rate of release

c. Direction of the spill, vapor or smoke release

d. Fire and/or explosion possibility

e. Area and materials involved and the intensity of the fire or explosion

f. Toxicological hazards

g. The extent of injuries, if any.

If the chemical spill is not contained, then an area of isolation will be established around the spill. The size of this area will generally depend upon the size of the spill and the chemicals involved. If the spill results in the formation of a toxic vapor cloud (by reaction with surrounding materials or by outbreak of fire) and releases (due to high vapor pressures under ambient conditions), then further evacuation efforts will be enforced. An assessment of meteorological conditions can be obtained by contacting a local weather forecaster. Since not all chemicals behave the in the same manner when released to the environment, evacuation distances will be based upon the distances provided in the latest version of the Emergency Response Guidebook published by the U.S. Department of Transportation, and can be found at http://phmsa.dot.gov/hazmat/library/erg.

When any spill occurs, only those persons involved in overseeing or performing emergency operations will be allowed within the designated hazard area. If possible, the area will be roped or otherwise blocked off.

The Local Emergency Planning Committee, GADNR, and the National Response Center will be notified when:

- The quantity of hazardous material spilled is equal to or greater than the reportable quantity specified in 40 CFR Part 302.

- One thousand gal or more of oil is spilled in a single event. If a lesser quantity is spilled, but enters a storm sewer leading to a waterway, then it is advisable to contact local and state authorities for assistance if it is not possible to intercept the spill at the outfall or to prevent the oil slick from moving downstream.

- The Spill involves other hazardous materials not listed in this permit but which pose an actual or potential hazard to life or property.

In accordance with regulations developed under the Comprehensive Environmental Response Compensation and Liability Act of 1980 (Superfund), spills involving 1 pound or more of any hazardous material for which a reportable quantity has not been established and which is listed under either the Solid Waste Disposal Act, Clean Air Act, Clean Water Act, or the Toxic Substance Control Act, must be reported to the GADNR.

Waste spills and leaks should be contained within the bermed areas of the HWSF, and collected with absorbent materials or pumped into a container. The contaminated area would then be flushed with water or some other appropriate surfactant solution. The rinsate and any contaminated absorbents will be containerized for disposal.

G-4e Prevention of Recurrence of Spread of Fires, Explosions, or Releases [40 CFR 270.14(b)(7) and 264.56(e)]

Procedures that will be followed to prevent the spread of fires, explosions, or releases were discussed in Section G-4d.

The IOSC will prepare a Pollution Incident Report (Table G-4), which will summarize the cause of the fire, explosion, or spill. This report will also indicate remedial actions, which will be taken to prevent any recurrence of the hazardous situation.

G-4e(1) Monitor for Leaks, Pressure Buildup, Gas Generation or Ruptures of Released Material [40 CFR 270.14(b)(7) and 264.56(f)]

If the HWSF stops operation in response to fire, explosion, or release, the emergency coordinator will monitor for leaks, pressure buildup, gas generation, pipes, or other equipment, wherever appropriate. The HWSF cooperator conducts a number of visual self-inspections or checks throughout the year. The inspections include a complete walk-through to identify leaks, proper valve position, security, cleanliness, functioning of grounding equipment, eye wash shower stations, and seals on firefighting equipment.

G-4f Storage and Treatment of Released Material [40 CFR 270.14(b)(7) and 264.56(g)]

Hazardous waste and expendable PPE resulting from a spill, fire, or explosion will be stored in accordance with its characteristics, using procedures that are used for any waste received. Storage will be at the HWSF. In the even the HWSF were unusable, waste would be stored at the 90 Day Storage Area co-located with the HMCP across Barnes Avenue from the HWSF. All contaminated waste resulting from the spill or subsequent cleanup will be accumulated in proper containers and disposed of properly. The Fort Gordon Hazardous Material Management Office will be advised of all hazardous waste generated and will assist with disposal. Recovered waste will be temporarily stored in compatible containment devices. Materials used in the cleanup of the spill will be containerized and analyzed to identify appropriate disposal procedures. If the material is determined to be hazardous waste, it shall be properly labeled and stored on-site for no more than 90 days prior to disposal at a permitted treatment storage and/or disposal (TSD) facility.

The disposal of impacted soil, water, equipment, and supplies generated during emergency response activities will be evaluated following the initial abatement response and disposed of in accordance with applicable local, state, and federal regulations.

G-4g Incompatible Waste [40 CFR 270.14(b)(7) and 264.56(h)(1)]

The IOSC will ensure that no wastes that may be incompatible with the released material are treated, stored, or disposed of until clean-up procedures are completed.

Table G-4. Reporting Form for Emergency Events.

Name, address, and phone number of owner or operator
Name, address, and phone number of facility
Date, time, and type of incident (e.g., fire, explosion)
Name, and quantity of material(s) involved
Extent of injuries (if any)
Assessment of actual or potential hazards to human health or the environment (if applicable)
Estimated quantity and disposition of material recovered from the incident
Send to: Georgia Department of Natural Resources Environmental Protection Division Land Protection Branch 2 Martin Luther King, Junior Drive Suite 1152, East Tower Atlanta, Georgia 30334

G-4h Post Emergency Equipment Maintenance [40 CFR 270.14(b)(7) and 264.56(h)(2)]

After an emergency event, all emergency equipment listed in Section G-7 will be cleaned or replaced immediately so that it will be available for its intended use. An inspection of all safety equipment will be conducted as discussed in Table F-1, General Inspection Schedule, before operations are resumed [40 CFR 264.56(i)]. The Regional EPA Administrator, state or local authorities will be notified that post-emergency equipment maintenance has been performed and operations will resume.

G-4i Container Spills and Leakage [40 CFR 270.14(b)(7) and 264.171]

Refer to Section G-4d for a discussion of emergency response procedures for container spills and leaks.

No leaking or damaged containers will be accepted at the HWSF. If a container holding hazardous waste should begin to leak during storage at the HWSF, its contents will be transferred to another container that is in good condition or placed in a salvage drum. Containers holding hazardous waste will be closed at all times, except when sampling is performed. No containers will be opened, handled, or stored in a manner, which may cause it to rupture or otherwise be damaged.

G-4j Tank Spills and Leakage [40 CFR 270.14(b)(7) and 264.196]

This HWSF does not use tanks to store hazardous wastes; therefore, this section does not apply.

G-4k Surface Impoundment Spills and Leakage [40 CFR 270.14(b)(7) and 264.227]

This HWSF does not operate surface impoundments; therefore, this section does not apply.

G-4l Containment Building Leaks [40 CFR 270.14(b)(7) and 264.1101(c)(3)]

This HWSF does not use containment buildings to store hazardous wastes; therefore, this section does not apply.

G-4m Drip Pad Spills and Leakage [40 CFR 270.14(b)(7) and 264.573(m)]

This HWSF does not handle hazardous wastes on drip pads; therefore, this section does not apply.

G-5 Emergency Equipment [40 CFR 270.14(B)(7) and 264.52(e)]

The Fort Gordon Fire Department will provide fire control. Fire extinguishers are located near the rolling door to the loading/unloading area (inside the building). Equipment for containing and cleaning up spilled hazardous waste ware available at the HWSF (in the large closet in the center of the building) and the Fire Department. A list of equipment and materials available at the HWSF is shown in Table G-5. Additional

spill control equipment is available for the STF at the Roads and Grounds Facility Building 2401. Appendix G-1 shows an example inventory of PPE, spill control, drums, and other spill equipment available at Building 2401. A telephone is located in a call box on the outside of the HWSF [(706) 791-5155]. There is also a phone located at the HMCP (Building 10604) [(706) 791-9824]. During loading/unloading operations, personnel will use two-way radios. A manually activated bell is used to signal for evacuation. Figure G-2 shows the locations of the fire extinguishers, eye wash/shower station, and telephone box. In addition, Figure G-3 shows the location and route of Fire Station #2 from the HWSA, and Figure G-4 shows the location and route from the HWSA to the hospital.

Table G-5. Protective and Spill Control Equipment Available at the HWSF and Building 2401, Fort Gordon.

Item	Equipment Capability	Specific Location
Disposable Tyvek suits	PPE	Building 10701
Chemical aprons (Paper and Rubber)	PPE	Building 10701
Rubber boots (steel toed/shanked)	PPE	Building 10701
Face shield	PPE	Building 10701
Long-handled shovel, non-sparking	For spill control and clean-up	Building 10701
Chemical fire extinguishers	For fighting chemical fires	Building 10701
Gloves	PPE	Building 10701
Goggles	PPE	Building 10701
Absorbent material	For clean-up of small spills of oil and water solutions	Building 10701
Respirators, and various PPE	PPE	Building 2401
Various sized drums and containers	For spill control and clean-up	Building 2401
Various decontamination equipment	For decontamination	Building 2401

Protective clothing and equipment are provided to protect employees during normal and emergency operations. Protective eyewear, gloves, rubber boots, and plastic aprons are the minimum protective

clothing required. First aid supplies are available at the HMCP. Fort Gordon maintains a post hospital with emergency room and ambulance service (Figure B-1).

G-6 Agreements with Local Authorities [40 CFR 270.14(b)(7), 264.52(c), and 264.37(b)]

The Fort Gordon Fire Department, hospital, police and Spill Task Force are familiar with the facility layout, the hazardous waste handled and other hazards associated with the HWSF. These departments are familiar with the emergency response procedures contained in this permit application and other emergency response plans. They have agreed to provide support in the event of an emergency situation. A signed statement indicating their understanding of the contingency plan and their commitment to provide response services is included in Appendix G-3. No formal agreements have been made with external responders such as the State or local emergency response teams or with emergency response contractors to provide manpower and equipment. There has never been an emergency, which necessitated outside assistance. Fort Gordon provides a stock of emergency equipment to maintain an inventory of emergency equipment and to deliver that equipment to the facility in the event of an emergency.

Dwight D. Eisenhower Medical Center is on the installation and will receive any post personnel injured as a result of an emergency at the HWSF. The emergency medical personnel at the Center receive Hazardous Waste Operations and Emergency Response (HAZWOPER) training.

Upon renewal of this permit, the Grovetown, Harlem and Augusta-Richmond County fire departments will be provided copies of this Contingency Plan; however, the Fort Gordon Fire Department will be the lead agency.

G-7 Evacuation Plan for Facility Personnel [40 CFR 270.14(b)(7), 264.52(f)]

All emergencies require prompt and deliberate action. In the event of any major emergency, it will be necessary to follow an established set of procedures. Such established procedures will be followed as closely as possible; however, in specific emergency situations, the IOSC may deviate from the procedures to provide a more effective plan for bringing the situation under control. The IOSC is responsible for determining which emergency situations require site evacuation. The evacuation routes are shown on Figure G-2. The criteria for evacuation would be an impending explosion, the formation of a toxic vapor cloud (by reaction with surrounding materials or by outbreak of fire), or other hazardous condition or major emergency. Since not all chemicals behave the same, evacuation distances will be based upon the distances provided in the latest version of the Emergency Response Guidebook published by the U.S. Department of Transportation, and can be found at http://phmsa.dot.gov/hazmat/library/erg.

In the event an evacuation from the HWSF is necessary, the following actions will be taken:

1. The signal for site evacuation (manually operated bell) will be activated.

2. No further entry of visitors, contractors, or trucks will be permitted. All vehicle traffic within the vicinity will cease to allow the safe exit of personnel and movement of emergency equipment.

3. All HWSF personnel, visitors, and contractors within the fence boundary of the HWSF will immediately leave through the exit gate.

4. No persons shall remain or re-enter the location unless specifically authorized by the person or persons calling for the evacuation. In allowing this, the person in charge assumes responsibility for those persons within the perimeter. Those within the fenced area will normally only include fire brigade personnel or emergency teams.

5. All persons will be accounted for by their immediate supervisors, and will leave the facility through the gate on the West Side. Supervisors will ensure that personnel stay together and proceed to a safe location.

6. Re-entry into the facility will be made only after clearance is given by the IOSC.

The IOSC will determine the need for evacuation of additional personnel in the vicinity of the HWSF.

All personnel are trained in evacuation procedures and means of exit from their respective work areas. Drills are held regularly to practice these procedures.

G-8 Required Report Procedures [40 CFR 270.14(b)(7), 264.56(j)]

Any emergency event (e.g., fire, explosion) that requires implementation of the Contingency Plan will be reported in writing within 15 days to the GADNR. A reporting form for emergency events is shown in Appendix G-2.

The following incidents require that a report be filed:

- All fires
- Chemical spills of more than five gal (or smaller volumes if highly toxic materials re involved)
- All injuries except minor cuts and bruises
- All burns and chemical irritations

- All equipment damage due to malfunction or operating error
- All "near misses" of the above that could have had serious consequences.

G-9 Location and Distribution of Contingency Plan [40 CFR 270.14(b)(7), 264.53]

HMCP (Building 10604), Directorate of Public Works, Environmental Division (Building 14600), and the Directorate of Emergency Services (Building 32422) keep copies of the Contingency Plan on post. Additionally, the Fort Gordon Fire Department, police, STF and hospital, as well as the Grovetown, Harlem, and Augusta-Richmond County Fire Departments will receive copies of this Contingency Plan upon renewal of the permit.

G-10 Amendment of the Contingency Plan [40 CFR 270.14(b)(7), 264.54]

The Contingency Plan will be reviewed, and promptly amended, if necessary, whenever:

1. The facility permit is revised
2. The plan fails in an emergency
3. The facility changes its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency
4. The list of emergency coordinators changes
5. The list of emergency equipment changes

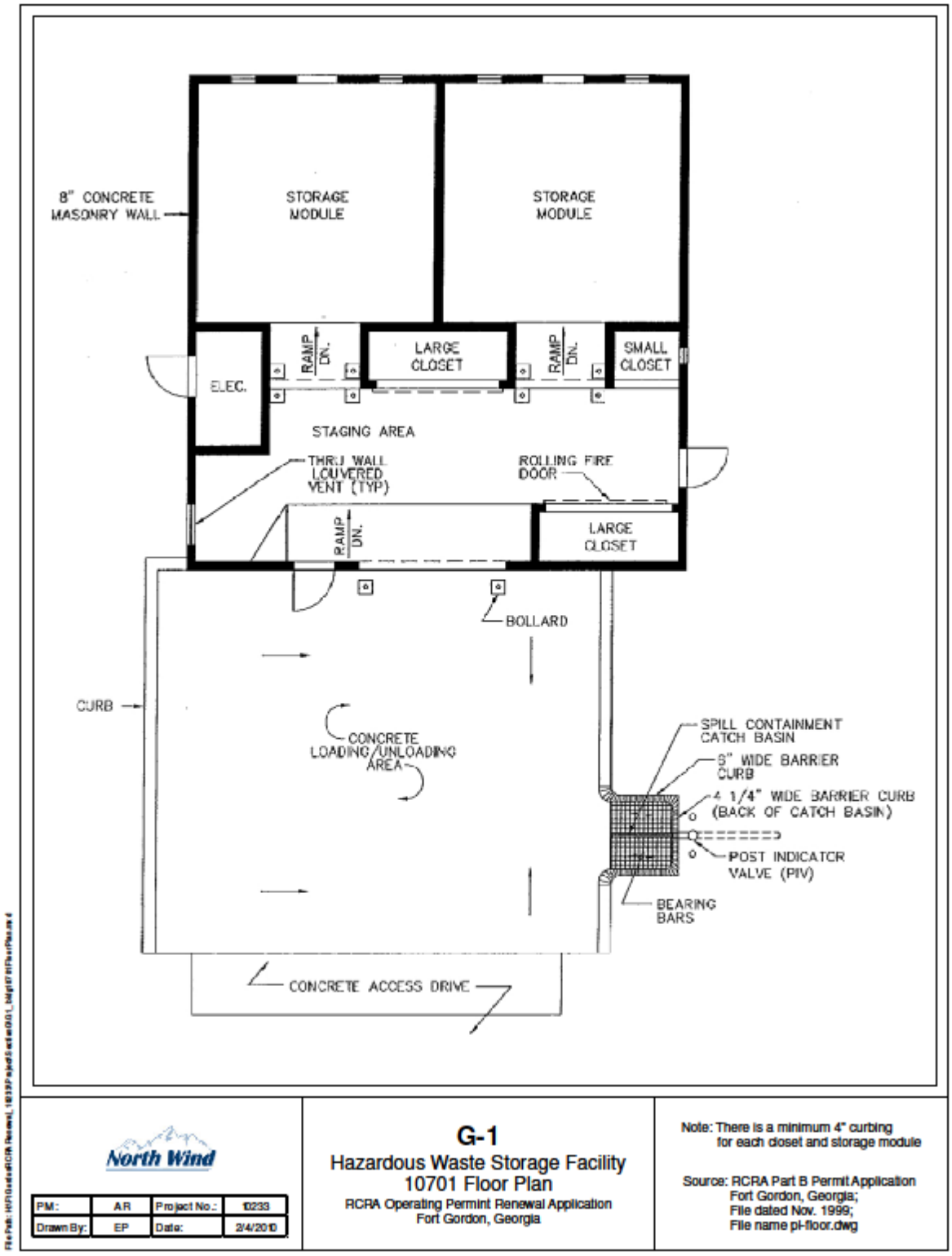


Figure G-1. Hazardous Waste Storage Facility 10701 Floor Plan

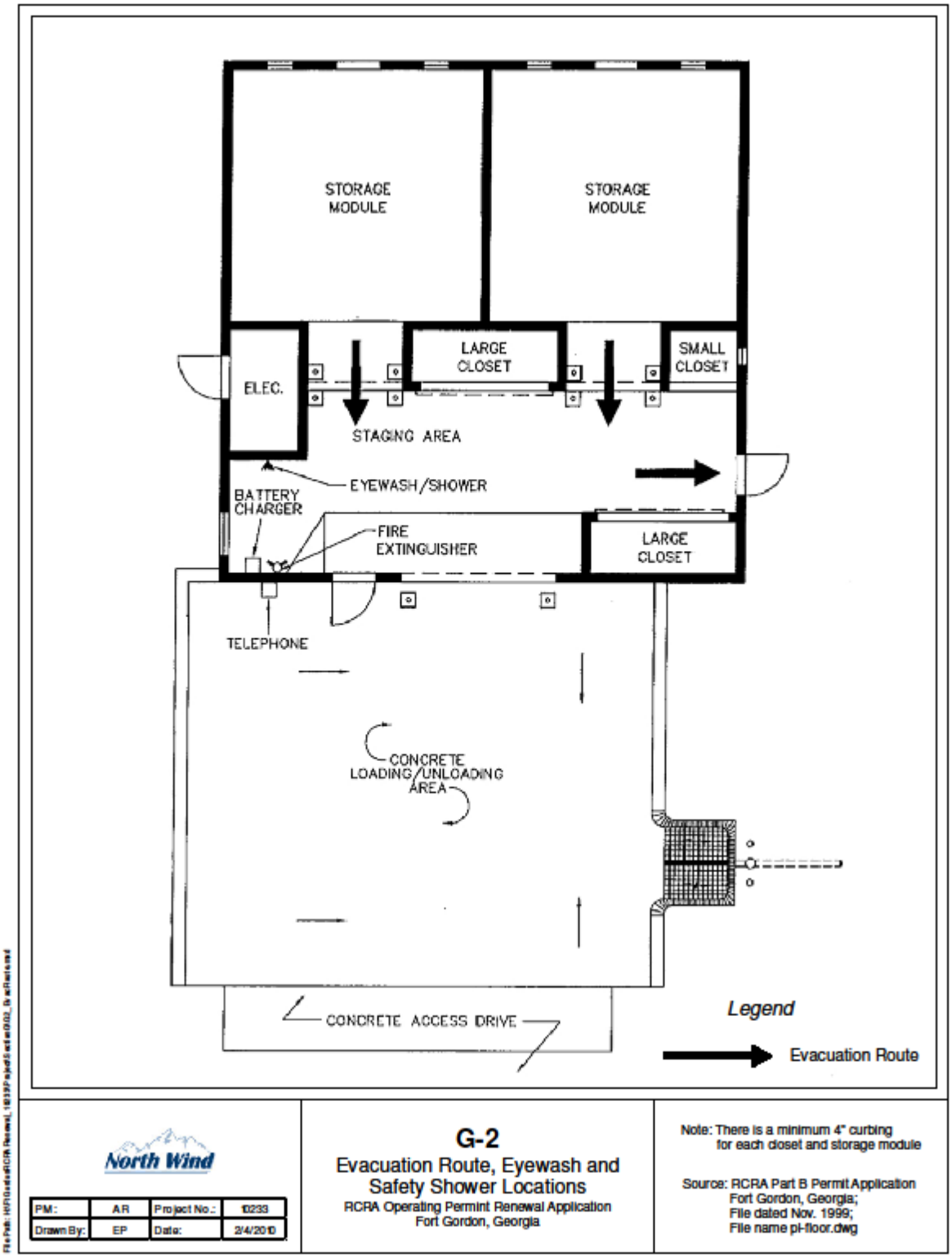


Figure G-2. Evacuation Route, Eyewash and Safety Shower Locations

Fort Gordon Hazardous Waste Management Plan
2018
Appendix H
Waste Characterization

Fort Gordon Hazardous Waste Management Plan
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Appendix H
Waste Characterization

1.0 Purpose. This SOP establishes procedures for determining if a waste is hazardous as generated from an activity occurring on Fort Gordon. Improper identification can result in health, safety, and environmental problems.

2.0 Definitions. A partial list of definitions is found in section 2 of this Plan and a complete list is in the regulations.

Hazardous Waste: a waste must first meet the definition of a Solid Waste (SW). If the waste is a solid waste then it may be a HW if it is one of the pure commercial chemical products listed in 40 CFR 261 or is the sole active ingredient of a commercial product; or if it exhibits one or more of the HW characteristics listed below:

- A 'P,' 'U,' 'K,' or 'F' listed waste in Subpart D of 40 CFR 261(2)
- A solid waste mixed with a P, U, K, or F listed waste found in Subpart D of 40 CFR 261
- Ignitable, reactive, corrosive, or toxic as identified in Subpart C of 40 CFR 261

Solid Waste: a solid waste, as defined in 40 CFR 261.2, is essentially any discarded material in any physical state (solid, liquid, gas, or sludge).

3.0 Responsibilities. Each activity and/or unit is responsible for determining if the waste it generates is hazardous according to Title 40 Code of Federal Regulations (CFR) Part 261.3. Determinations may be based on generator knowledge or information taken from Safety Data Sheets. If a determination cannot be made using generator knowledge or SDS information, the waste may require chemical analysis.

For assistance in determining if wastes are hazardous, contact the Fort Gordon Environmental Division at:

Environmental Division
515 15th Street, Building 14600
Fort Gordon, GA 30905-5040
Telephone: 706-791-6136

After the waste is identified, the ED will develop a Hazardous Waste Profile (HWP). The HWP must accompany all waste turned-in to the DRMO the first time or any time the profile has been modified and/or updated. Additionally, generators will keep a copy of the HWP on file.

4.0 Characterizing Waste.
As the definition for hazardous waste explains, a solid waste is a hazardous waste if it is specifically listed as a known hazardous waste or meets the characteristics of a hazardous waste.

Listed wastes are wastes from common manufacturing and industrial processes, specific

industries, and can be generated from discarded commercial products.

Characteristic wastes are wastes that exhibit any one or more of the following characteristic properties: ignitability, corrosivity, reactivity or toxicity.

In addition, mixing waste that is either *listed* or *characteristic* with any material or other waste will cause the entire mixture to be a HW.

4.1 LISTED HAZARDOUS WASTES

a) "F" LISTED WASTE

"F" listed wastes are generated from non-specific sources and include such wastes as spent solvents used in degreasing, metal plating wastes that contain cyanides, electroplating by-products, and other metal cleaning type wastes. These wastes are assigned an EPA HW number beginning with F.

b) "K" LISTED WASTE

"K" listed wastes are generated from specific industry processes such as wood preserving, explosive manufacturing, and pesticide production. A common DOD K-listed waste is pink water from TNT manufacturing. These wastes are assigned an EPA HW number beginning with a K.

c) "P" & "U" LISTED WASTES

The last two lists are the "P" and "U" lists that are discarded commercial chemical products that have not been used, off-specification products, container residues, and spill residues of these chemicals. The "P" list are those determined by EPA to be acutely HWs and the "U" list consists of toxic wastes. These wastes are assigned an EPA HW number beginning with a P or U.

4.2 CHARACTERISTIC HAZARDOUS WASTES

Wastes that are not listed (or mixed with a listed waste) are a HW if they exhibit a HW characteristic. The four characteristics of a HW are described below.

a) IGNITABILITY

A material is considered *ignitable* if a representative sample has any of the following properties:

- It is a liquid other than an aqueous solution containing less than 24 percent alcohol by volume and has a closed cup flash point less than 60°C (140°F);
- It is not a liquid and is capable under pressure of causing fire through friction, absorption of moisture or spontaneous chemical changes, and when ignited

burns so vigorously and persistently it creates a hazard;
- It is an ignitable compressed gas;
- It is an oxidizer.

An ignitable waste is assigned an EPA HW number of D001. Examples of D001 wastes include: fuel filters, paint thinners, spent alcohols, and contaminated fuel.

b) CORROSIVITY

A material exhibits *corrosivity* if a representative sample of the material has any of the following properties:

- It is aqueous and has a pH less than or equal to 2 (strong acid) or greater than or equal to 12.5 (strong base);
- It is a liquid that corrodes steel at a rate greater than 6.35 mm (0.250 inches) per year at a test temperature of 53°C (130°F).

A corrosive waste is assigned an EPA HW number of D002. Examples of D002 wastes are sulfuric acid and sodium hydroxide.

c) REACTIVITY

A material is considered *reactive* when a representative sample of the material has any of the following properties:

- It is normally unstable and readily undergoes violent change without detonating;
- It reacts violently with water;
- It forms potentially explosive mixtures with water;
- When mixed with water, it generates toxic gases, vapors, or fumes in a quantity sufficient to present danger to human health or the environment;
- It is a cyanide or sulfide-bearing material which when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment;
- It is capable of detonation or explosive reaction under circumstances outlined in DOT 49 CFR 173.

A reactive waste is assigned an EPA HW number of D003. A common example of a D003 waste is lithium batteries.

d) TOXICITY

A material exhibits the characteristics of *toxicity* if a representative sample of the material contains any of the elements in 40 CFR 261.24 at a concentration greater than that specified in Table 3-1 (recreated from Table 1 in 40 CFR 261.24). A waste that exhibits toxicity as a result of a chemical test called the Toxicity Characteristic Leaching Procedure (TCLP) is assigned the EPA HW number that corresponds to the contaminant in the Toxicity Characteristic table. Examples of this type of characteristic waste are lead in paint scrapings and silver-bearing wastes from photographic processes.

Table 3-1
Maximum Concentrations of Contaminants for the Toxicity Characteristic

EPA HW No.	Contaminant	Regulatory Level (mg/L)	EPA HW No.	Contaminant	Regulatory Level (mg/L)
D004	Arsenic	5.0	D032	Hexachlorobenzene	0.13
D005	Barium	100.0	D033	Hexachlorobutadiene	0.5
D018	Benzene	0.5	D034	Hexachloroethane	3.0
D006	Cadmium	1.0	D008	Lead	5.0
D019	Carbon tetrachloride	0.5	D013	Lindane	0.4
D020	Chlordane	0.03	D009	Mercury	0.2
D021	Chlorobenzene	100.0	D014	Methoxychlor	10.0
D022	Chloroform	6.0	D035	Methyl ethyl ketone	200.0
D007	Chromium	5.0	D036	Nitrobenzene	2.0
D023	o-Cresol	200.0	D037	Pentachlorophenol	100.0
D024	m-Cresol	200.0	D038	Pyridine	[3]5.0
D025	p-Cresol	200.0	D010	Selenium	1.0
D026	Cresol	200.0	D011	Silver	5.0
D016	2,4-D	10.0	D039	Tetrachloroethylene	0.7
D027	1,4-Dichlorobenzene	7.5	D015	Toxaphene	0.5
D028	1,2-Dichloroethane	0.5	D040	Trichloroethylene	0.5
D029	1,1-Dichloroethylene	0.7	D041	2,4,5-Trichlorophenol	400.0
D030	2,4-Dinitrotoluene	0.13	D042	2,4,6-Trichlorophenol	2.0
D012	Endrin	0.02	D017	2,4,5-TP (Silvex)	1.0
D031	Heptachlor (and its epoxide)	0.008	D043	Vinyl chloride	0.2

Fort Gordon Hazardous Waste Management Plan
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Appendix I
Hazardous Material Control Point

Fort Gordon Hazardous Waste Management Plan
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Appendix I
Hazardous Material Control Point

1.0 Scope. All HW produced on the installation will be processed through the HMCP. This includes activities whether inducted or not. However, the procedures for Hazardous Material (HM) receipts applies only to those military and civilian organizations that have been formally inducted into the HMCP.

The HMCP receives all HM and assigns a bar code identifier to each unit of issue. When an activity on base needs HM, personnel are issued the item(s) from the HMCP in a quantity sufficient to complete the mission. The activity is responsible for returning the empty container or unused portion to the HMCP. Utilizing the HMCP allows the activities on the installation to receive the advantages of bulk purchases without having to acquire unnecessary materials that may, if unused for extended periods, generate waste. The bar code identifier provides a tracking mechanism to allow HMCP and ED personnel to manage all HM from "cradle to grave."

2.0 Mission. The mission of the HMCP is to track all HM and HW, monitor HM use, assist in HM reutilization, look for efficiencies, and promote Pollution Prevention (P2) and HM/HW minimization. The DDEAMC is mission-exempt.

3.0 Purpose. The purpose of the HMCP is to improve regulatory compliance and inventory management procedures for all HM consumed by the Fort Gordon Community. This goal shall be achieved by the tracking all HM received and HW produced by each HMCP customer. This "cradle to grave" management will be accomplished through the utilization of the Enterprise Environmental, Safety, and Occupational Health- Management Information System (EESOH-MIS).

This goal can only be accomplished with the help of the Fort Gordon Community. Everyone must ensure that all HM purchases and the depletion of those materials are reported to the HMCP. This includes HM purchased through any method other than normal supply channels.

Benefits to be gained from the operation of the HMCP include: reduced HM inventories, reduced HM usage, reduced HW generation, a safer work environment through the introductions of authorized environmentally benign products, and procurement savings.