

## FY24 JBLM Environmental Compliance Checklist

Training, Staff Appointments and Records Review		
	Question	Reference
D1	Is the Environmental Officer (EO) appointed at the required rank/position?	FL Reg 200-1 Ch 2-12.d.
D2	Are the EO and the Hazardous Material (HM)/ Hazardous Waste (HW) Tech trained?	AR 200-1, para 10-1 d.(2)
D3	Are EO, HM/HW Technicians and Civilian Manager Appointee appointment orders on file and current?	FL Reg 200-1 Ch 2-12.d.
D4	Is the HJB form 223 Customer Service Agreement current, stamped, and dated as received by the Environmental Operations Office?	AR 200-1, para 10-1 a.(1)(a)
D5	Are the facility hazardous material storage area inspections documented quarterly using HJB Form 951 and maintained for one year?	AR 200-1 Para 1-28c
D6	Are the facility Satellite Accumulation Area (SAA) inspections documented weekly using HJB Form 950A, or an approved equivalent document. Have all deficiencies identified during weekly HW inspections been corrected? Are a minimum of three years of weekly Satellite Accumulation Area inspections on file?	FL Reg 200-1 Ch 8.b.
D7	Is the ECO providing annual spill training to their unit/activity?	NPDES #WAS026638 WAC 173-303-200.9.a
D8	Does the unit/activity either (1) submit accurate HJB Form 953 quarterly inventories to DPW ED or (2) submit material decrement digitally in EESOH-MIS?	EXORD 181-21.5.a EPCRA/TRI
D9	Does the unit have a minimum of one person and one alternate identified to utilize EESOH-MIS and do they have an active account? (Note: EESOH-MIS is Enterprise Environmental, Safety and Occupational Health Management Information System.)	EXORD 181-21.5.a EPCRA/TRI
D10	Are all HM on site listed on the unit's Authorized Use List (AUL) in EESOH-MIS?	EXORD 181-21.5.a EPCRA/TRI
D11	Is the site specific contingency plan and associated map current, and legible? Contains a map of locations, materials (including HW), associated hazards, and spill plan guide.	WAC 173-303-174(1)(i) WAC 173-303-201 Anticipated SPCC Plan 40 CFR 112 requirements, TBD 40 CFR Part 355
D12	Over the last year has the unit performed any alteration to their facilities. If yes can the unit provide the documentation that they have obtained a job order/records of environmental consideration/building surveys. This includes (additions, demolitions, any changes to a structure as well as minor repair or alteration of floor, ceiling, door, and wall damage and/or any repainting accomplished. Even hanging pictures is not allowed.	NA. Data gathering only.
D13	Do you have any current, outstanding or future plans for facility renovations? If yes did you submit the proper documentation.	NA. Data gathering only.

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Hazardous Waste - Satellite Accumulation Areas (SAAs)		
	Question	Reference
W1	Can the organization identify who to contact to characterize new waste streams i.e. from new processes, expired hazmat or spill response material?	WAC 173-303-070(1)&(3)
W2	Is the SAA locked and/or is access limited to those that are trained and certified? NOTE: (A certified Supervisor/Environmental Officer or Waste Tech on site managing access to prevent mixing of waste streams).	WAC 173-303-174(1)
W3	Is the total amount of waste stored in each SAA less than 55 gallons for hazardous waste or 1 quart for acutely hazardous	WAC 173-303-174(1)&(1)(g)
W4	Are all containers in good condition and compatible with the waste?	WAC 173-303-174(1)(a)&(b);
W5	Are all containers closed, snap ring bolts; lock nuts; and bung caps securely tightened except when waste is being added or removed?	WAC 173-303-174(1)(c)
W6	Are wastes within the SAA segregated based on compatibility?	WAC 173-303-174(1)(e)
W7	Are only the contents listed on the container label being added to the container?	WAC 173-303-160 WAC 173-303-522 WAC 173-303-515 WAC 173-303-174(e)
W8	Are all hazardous waste containers properly marked with the words "Hazardous Waste" or "Dangerous Waste" and indicate the hazards associated with the contents of each container (by words or pictogram/DOT label)?	WAC 173-303-174(1)(f)
W9	Does the SAA have the required emergency equipment? [Plaque with current POCs and phone numbers, alarm or communication device, working fire extinguisher, serviceable spill kit].	WAC 173-303-174(1)(i) WAC 173-303-201
W10	Can personnel identify the location of spill contingency plan/equipment?	WAC 173-303-174(1)(i) WAC 173-303-201
W11	If HM is stored in SAA is the location where HM is stored clearly delineated (i.e. with a line of tape, on a different shelf) from the area where the HW is stored?	WAC 173-303-174(1)(e)iii 40 CFR 262.15 (a)(3)iii
W12	Does each SAA have adequate secondary containment for all waste?	40 CFR Part 264
W13	Are containers and tanks used to accumulate spent antifreeze labeled "Spent Antifreeze?"	WAC 173-303-522 (2)(ii)
W14	Are containers of spent antifreeze stored on secondary containment?	WAC 173-303-522(2)(iv)
Universal Waste Management		
	Question	Reference
W15	Are universal wastes placed in containers and are containers kept closed except when adding or removing waste.	WAC 173-303-573(20)(g)
W16	Are universal wastes labeled with "Universal waste — batteries/lamps/mercury containing equipment?", "Waste batteries/lamps/mercury containing equipment?" or "Used batteries/lamps/mercury containing equipment?"?	WAC 173-303-573(21)(a)(b)c
W17	Are universal waste containers labeled with the accumulation start date and turned in to the the DPW ED Central Waste Facility within 300 days of the accumulation start date?	WAC 173-303-573(22)(a)
Solid Waste Management/Recycling		
	Question	Reference
W18	Are paper, scrap metal, wooden pallets, plastic, etc. being recycled? (This includes properly drained used oil filters)	40 CFR 243.100(b)
W19	Are lidded recycle and solid waste containers being kept closed to prevent leakage or rainwater collection?	40 CFR 243.200-2.a.e
W20	Are containers adequate size and sufficient in number to contain all waste and or is the waste contained or bundled in manner as not to result in spillage?	40 CFR 243.200-2.a.e

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Hazardous Materials Management		
	Question	Reference
M1	Do "Bulk" material storage areas meet storage requirements?	AR 200-1 Para 1-28c FL Reg 200-1
M2	Are daily and "IN-USE" materials being properly stored in an NFPA approved cabinet, and /or poly packs.	29 CFR 1910.106(d)(1)(ii), NFPA 251-1969
M3	Are storage areas solely used for the storage of HM, segregated from hazardous waste, leaks, clutter, and debris?	29 CFR 1910.176 (c)
M4	Do all containers have the manufacturer's label or a DD-2522 with the contents properly identified?	29 CFR 1910.1200(f)(6)
M5	Are all containers in good condition and closed when not in use?	29 CFR 1910.176, S
M6	Are containers 55 gallons or greater (non POL) stored on secondary containment?	40 CFR 264.175
M7	Are expired hazardous materials, still in use/not inherently waste like?	AR 200-1 Para 1-28c
Clean Water Act - Stormwater		
	Question	Reference
CW1	Are all outdoor secondary containment systems properly maintained and deployed and kept clear of trash, debris, and standing materials (any materials which are contained that can pose a hazard to the storms sytem i.e. POL, antifreeze, AFFF)?	NPDES #WAS026638 Section 2.5 JBLM Reg 200-3, JBLM Stormwater Management Plan
CW2	Is secondary containment present and properly deployed for all outdoor fuel trucks and pods that contain fuel?	NPDES #WAS026638 Section 2.5
CW3	During the site visit, is facility free from illicit discharges that can reach the stormwater system? (purpose is to identify illicit discharges during the site visit)	NPDES #WAS026638 Section 2.5
CW4	Are there any unresolved spills or vehicle/equipment leaks?	NPDES #WAS026638 Section 2.5
CW5	Do the storm drains provide for the flow of stormwater? i.e. free from clogs generated from trash, or sediment, that would cause the drain to pool water.	NPDES #WAS026638 Section 2.5
CW6	Does the unit/organization have appropriate spill materials/spill kits within 25 feet of hazardous materials that could reach the stormwater system?	NPDES #WAS026638 Section 2.5
POL Bulk Storage Containers (>=55-gallons)		
	Question	Reference
T1	Are used oil storage containers 55-gal or greater clearly labeled with the phrase "Used Oil"?	40 CFR 279.22(c)(1)
T2	Are all POL storage containers (excluding mobile refuelers) 55-gal or greater stored on, or have built-in double-walled design, secondary containment?	40 CFR 112.7(c) 40 CFR 112.8(c)(2) WAC 173-303-515(6)(a)(ii)
T3	Are used-oil containers closed except when adding or removing used oil?	WAC 173-303-515(6)(a)
T4	Are all POL storage containers 55-gal or greater inspected monthly (using checklist #XX) and annually (using checklist #XX) (Checklists currently being finalized)	40 CFR 112.3 WAC 173-180-320(1)(i)
T5	Are monthly and annual POL storage container inspection records kept for 3 years?	40 CFR 112.3 40 CFR 112.8(c)(6)
T6	When filling an POL storage container 55-gal or greater, is at least one of the following overfill prevention methods in place: 1 - automatic overfill shutoff device/valve. 2 - diaphragm pump that slows/stops flow when AST at or near capacity. 3 - liquid level visually observed during filling. 4 - liquid level gauge observed during filling. 5 - if container liquid level gauge is too far from pumping station to be visible: direct communication between one person observing container gauge and one person at the the pumping station.	40 CFR 112.8(c)(8) WAC 173-303-515(6)(a)(ii)

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Clean Air Act/Toxic Substances		
	Question	Reference
A1	Are SOPs present for processes that do not have a Notice of Construction but are regulated under the JBLM Synthetic Minor Permit. (CARC painting/coating, solvent usage/degreasing)	PSCCA Regulation I Section 5.05(c)
A2	Does the unit/activity have a Notice of Construction for applicable equipment/processes. (fueling, paint booth, spray gun painting, abrasive blasting, welding, non emergency stationary generators greater than 50HP - includes mobile generators in place more than 12 months)	PSCAA Regulation I Section 6.03
A3	Are any/all non-emergency generators been approved by the Air Program or is an emergency generator being used for a non-emergency? (does not apply to engines with a National Security sticker placed by the manufacturer)	40 CFR Part 63.6605
A4	For solvent tanks, is the tank on the MASTER inventory list with the make and capacity?	PSCCA General Regulatory Order 12131 Condition 4.e. (Synthetic Minor Permit)
A5	Is the material in used in the solvent tank/parts washer, on the AUL? If yes is the solvent in APIMS?	PSCCA General Regulatory Order 12131 Condition 4.e. (Synthetic Minor Permit)
A6	Has the facility reported solvent replacement to the air program by the 15th of the following month?	PSCCA General Regulatory Order 12131 Condition 4.e. (Synthetic Minor Permit)
A7	When not in-use, are solvent parts washer lids/solvent tanks and containers, and/or or bags with solvent-laden cloth or other applicators used for cleaning kept closed when not in use?	WAC 173-400-102(1)(b)
A8	Are unit/organizational members that work with refrigerant compounds trained and certified with certificates available for review?	40 CFR 82.161(a)
A9	Are the appropriate refrigerant cylinders properly labeled and stored?	40 CFR Appendix F to Subpart B of Part 82 AHRI 2016 Guideline for Assignment of Refrigerant Container Colors
A10	For refrigerant recovery equipment, is the equipment properly UL certified, (hydrostatic testing within 5 years) labeled and	40 CFR 82.36 or 82.158
A11	Does the unit activity perform the following requirements for asbestos containing waste (asbestos brakes shoes, clutch facings, gasket materials, tiles, doors etc)?: (1)properly store, label and dispose, (2) obtain the required permits from DPW ED (3)transfer the waste to the JBLM HW Yard within 10 days from the date waste was first placed in the waste container.	PSCAA Regulation Section 4.07 40 CFR 61.150(a) - (b)