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 Devens Reserve Forces Training Area
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Environmental Protection and Enhancement
MANAGEMENT OF HAZARDOUS WASTE

HISTORY. This is the second publication of this regulation under the Devens Reserve Forces Training Area (RFTA).

SUMMARY. This regulation covers policies and procedures for the management of hazardous waste.

APPLICABILITY. This regulation applies to all Devens RFTA directorates, staff activities, and military organizations, and also to government agencies, civilian organizations, contractors, and individuals who are training, doing business, conducting research, or otherwise using Devens RFTA facilities. It is both informative and directive in nature.

SUGGESTED IMPROVEMENTS. The Environmental Branch of Directorate of Public Works (DPW) is the proponent of this publication. Users are invited to send comments and suggested improvements on Department of the Army (DA) Form 2028 (Recommended Changes to Publications and Blank Forms) to Commander, DRFTA, ATTN: IMNE-DEV-PWE, Devens, MA 01434-4479.

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CHAPTER 1. INTRODUCTION

1-1. Purpose. The purpose of this regulation is to discuss regulatory requirements, assign responsibilities, and document installation policy, standards, and procedures that comply with Army, state, and federal hazardous waste regulations.

1-2 Applicability. The intended users of this guidance are the managers and operators of hazardous waste generating operations located on the Devens Reserve Forces Training Area (RFTA).

1-3 Scope. This regulation is based upon Section 3002 of Subtitle C-"Hazardous Waste Management" of the Resource Conservation and Recovery Act (RCRA) (42 United States Code (USC) 6922). Section 3002 covers the hazardous waste generator. The implementing regulations for this law are Title 40 of the Code of Federal Regulations (CFR), Subchapter I, and Title 310 of the Code of Massachusetts Regulations (CMR), Chapter 30. The portions of these regulations that concern Devens RFTA generators are clarified in this regulation, as follows.

- a. Regulatory status, general standards, and types of regulated sites.
- b. Installation policies and standards.
- c. Responsibilities of those accountable for hazardous waste management.
- d. Procedures to establish, inspect, manage, and remove waste from regulated waste sites.

1-4. Regulatory Background.

a. Regulations have been established by the federal government, the Commonwealth of Massachusetts, and the Department of the Army (DA). Much of the statutory reasoning and many of the details of the governing regulations are too unwieldy to present here. Therefore, the governing statutes and regulations, as well as the basic policies for meeting the requirements of these statutes and regulations, are presented without significant explanation.

b. The statutory basis for regulation of hazardous waste begins with Public Law (PL) 94-580, 42 USC 6901, the Resource Conservation and Recovery Act (1976), Subtitle C, (RCRA-C) and continues to be revised with subsequent amendments. This law amended the Solid Waste Disposal Act (SDWA) (1965) and the Resource Recovery Act (1970) and it was amended again in 1980, 1984, 1988, and 1992. Of significance is the 1992 amendment, the Federal Facility Compliance Act (FFCA), PL 102-386 that requires that all federal facilities comply with hazardous waste laws and regulations.

c. The primary regulations mandated by RCRA-C are located at 40 CFR Part 260 et al. (40 CFR 260), and 310 CMR, Chapters 30.000 and 40.000. These regulations address hazardous waste generators, transporters, and treatment, storage, and disposal facilities. Title 49 CFR contains the regulations governing transport of hazardous materials, of which hazardous waste is a subset. These regulations continue to be revised and expanded on a regular basis.

d. The primary agencies responsible for creating and enforcing regulations that affect hazardous waste generators are the federal Environmental Protection Agency (EPA) (40 CFR), the Massachusetts Department of Environmental Protection (MA DEP) (310 CMR), and the Research and Special Programs Agency (RSPA) of the Federal Department of Transportation (DOT) (49 CFR).

1-5. Special Terms.

a. Generator. The person having leadership capacity for an organization or activity (examples include staff or tenant Commander, training unit commander, contractor) whose operations produce waste oil, a hazardous waste, or spill debris. Because the installation is legally identified as a large quantity generator, the terms generator and large quantity generator, which is further described at Paragraph 2-2, are used interchangeably in this regulation.

b. Hazardous Item. An article or item that contains a hazardous material, or a hazardous material in its original container.

c. Hazardous Waste (HW). A solid waste that is either listed at 310 CMR 30.131 through 30.136 as a hazardous waste, or is characterized as hazardous for ignitability, corrosivity, reactivity, or toxicity, as defined at 310 CMR 30.120 through 30.125B. Hazardous waste may also be referred to as waste or HW in this and other regulations.

d. National Environmental Policy Act (NEPA) documentation. A written statement or report, which verifies that a project, prior to execution, was analyzed for its potential to impact the environment. Examples of NEPA documents include Environmental Impact Statement (EIS), Environmental Baseline Study (EBS), Environmental Assessment (EA), and Record of Environmental Consideration (REC).

e. Record of Environmental Consideration (REC). The simplest form of NEPA documentation. It is used only when the Army has determined that an extensive study to generate an EIS or EA is not required.

f. Regulated operation. An operation that generates hazardous waste. Examples include vehicle oil change, boiler maintenance, brake shoe repair, vehicle or radio battery change, air conditioner maintenance, removal of lead paint, fluorescent lights/ballasts, or asbestos floor tile.

g. Regulated waste site. A location for collecting or staging hazardous waste. Specific regulatory names given to regulated waste sites include the following.

(1) Hazardous Waste Accumulation Area (HWAA). Also called a 90-day area, a location for collecting and staging hazardous waste for no more than 90 days.

(2) Satellite Generation Point (SGP). The point at which hazardous waste is first generated.

(3) Treatment Storage and Disposal Facility (TSDF). A facility permitted by the EPA to store for longer than 90 days, treat, recycle, and dispose of hazardous waste.

(4) Universal Waste Accumulation Area (UWAA). A location designated to collect universal waste for up to one year.

h. Secondary Containment. A pan, bermed space, geographical surface depression, or other container which surrounds, holds, or collects leaking material from another item such as a container, vehicle, or piece of equipment.

i. Universal Waste (UW). A recyclable hazardous waste that has been selected by the EPA and the MADEP to be regulated less stringently than other hazardous wastes. See Section 6-7 for a detailed discussion of universal waste.

CHAPTER 2. GENERAL REGULATORY STANDARDS

2-1. Generator Status.

a. The Devens RFTA Installation is registered with the Environmental Protection Agency as a Large Quantity Generator of hazardous waste. This means that the installation's regulated operations are allowed to generate more than 3 to 5 drums (2200 pounds) of hazardous waste in a calendar month.

b. Large quantity generator status is granted to the Department of the Army for all of the property owned by the Army at this location. Authorization of large quantity generator waste sites at the Devens RFTA is contingent upon the fact that the operations, waste sites, and workers comply with RCRA-C at all times.

c. Every operation on the installation, regardless of size or rate of hazardous waste production, is subject to the large quantity generator standards. To ensure early detection of noncompliance issues, and subsequent resolution well before the situation escalates to a serious threat to human life or the environment, and/or revocation of the privilege to generate hazardous waste in large quantity, the following systematic practices must occur:

(1) The regulated generation site and waste collection sites must be checked frequently, and must be under the control of an individual trained to handle hazardous waste.

(2) Minor spills, drips, or other situations must be attended to immediately, and a written plan must be in place for reporting larger spills, through the organization, to the MA DEP.

(3) On-site emergency POC contact information must be posted at each facility where hazardous waste activities are being conducted. This information must be posted in visible, easily accessible areas near these hazardous waste activities. This information should be posted at or near the SGPs and HWAAs and include the HWM and emergency POCs with their

telephone numbers.

(4) The generator must inspect the regulated waste site at least weekly, and the result of the inspection must be documented in writing, see Chapter 6, "Inspections."

2-2. Large Quantity Generator Standards. Devens RFTA generators are accorded certain privileges with respect to collecting and staging hazardous waste prior to transportation for disposal or treatment, but are restricted from transporting, treating, or disposing of hazardous waste, as outlined below.

a. Generators may collect single containers of hazardous waste at a SGP until the collection container is full. Generators may stage an unlimited number of full containers at a HWAA for a maximum time period of 90 days. Generators may stage up to 5000 pounds of a universal waste at a UWAA for a maximum time period of one year.

b. Regulated operations and waste site(s) must be constructed and managed in accordance with the regulatory standards located at 40 CFR and 310 CMR, see Appendix A.

c. Generator personnel must be trained sufficiently to perform their duties in a manner that ensures the generator's facility maintains compliance with the mandated regulations, see Chapter 5, "Planning."

d. Generators may not transport hazardous waste from one generator site or building to another on public roads except where buildings are adjacent to one another or directly across the roadway from one another. Only licensed hazardous waste transporters are allowed to transport hazardous waste over public roadways of the commonwealth of Massachusetts.

e. Generators may not treat, store, or dispose of hazardous waste anywhere on Devens RFTA land, facilities, or training areas. (This restriction includes the land, solid waste dumpsters, tanks, buildings, equipment, bodies of water, wetlands, and air.) Only permitted TSD facilities are allowed to treat, store, or dispose of hazardous waste.

2-3. Authorized Waste Collection Sites. Owners of regulated operations (e.g., maintenance facility or other operation that generates waste) operate the regulated waste sites. The following types of regulated waste sites are authorized for collection of waste from regulated operations at the Devens RFTA.

a. SGP for containers. A location designated for partially filled containers, one container for each waste stream generated by the activity. Maximum quantity allowed is 55 gallons per waste stream.

b. HWAA for containers. A location designated for staging one or more full containers of each waste stream, time limit of 90 days.

c. HWAA for Waste Oil. An above ground storage tank designated for the collection of waste oil. This tank must be emptied every 90 days.

d. UWAA for Fluorescent Lights. A location designated for staging up to 5000 pounds of used, unbroken fluorescent lights, time limit of one year.

CHAPTER 3. DEVENS RFTA POLICY AND STANDARDS

3-1. Disposal Decision Priority Policy. Selection of recycling, reuse, and disposal options will be made in accordance with the following order of priority: preservation of worker and public health and safety, long-term liability for the installation and the Army, and compliance with local, state, and federal regulations.

3-2. Solid Waste Determination Policy. A hazardous item will not be considered a solid waste until the Army Supply System has declared it to be excess or has no existing requirement for the item; and the Defense Reutilization and Marketing Office (DRMO), after exerting due diligence to market the item, has not been able to sell it. When the marketing process has failed, the DRMO will contact the hazardous waste manager (HWM). Hazardous items are not to be turned in to the HWM directly by the unit.

3-3. Determination of Excess. If the Army no longer has a use for a material, the Army Supply System will declare the item to be excess and owner of the item must prepare a 1348-1 turn-in document (TID). Using this document, the supply office will turn the item over to the DRMO for sale. If the DRMO cannot sell the item, the DRMO will inform the HWM that this item has become waste. Unit funds will be used to pay for the disposal.

3-4. Turn-in of Excess Supply Items. Garrison activities will turn in excess hazardous items for reuse by the Army through the activity's designated supply office. The Devens RFTA Directorate of Logistics (DOL), Supply Branch is the supply office for the Devens RFTA. Owning activities will turn items into the DOL, following DOL turn-in procedures. Other components will use their own designated supply chain in accordance with approved Interservice Support Agreements (ISSAs), Memoranda of Agreement (MOA) and tenant agreements.

3-5. Planning Standards. Each generator must meet certain planning requirements before generating hazardous waste. Procedures for meeting the requirements listed here are discussed in Chapter 5.

a. NEPA Documentation. Before establishing a regulated site generators must register with the Environmental Officer, complete at a minimum, a Hazardous Waste Generator Identification form, (see Appendix B, Figure B-1), Record of Environmental Consideration (see Appendix B, Figure B-2), and understand the environmental compliance guidance issued by the Environmental Officer.

b. Training. Generators must be trained formally and on the job on an annual basis.

c. Establishment of Regulated Sites. Generators must use regulatory standards, sign a generator agreement (see Appendix B, Figure B-3), and become familiar with installation spill response procedures.

d. Closure of Regulated Sites. When no longer needed, regulated waste sites must be formally closed.

e. Field Exercises. All field exercises and temporary actions must receive NEPA review and documentation. Actions that have potential to release hazardous materials or waste to the open environment, must be carefully planned in accordance with Army, state, and federal regulations, considering all potential impacts to the environment.

3-6. Operational Standards. Regulated sites must be constructed and operated within a fixed set of regulatory standards. The standards are listed here and the Devens RFTA procedures for complying with these standards are located at Chapters 6 through 11.

a. Regulated operations and waste sites must be constructed and in accordance with state and federal regulatory standards, also see Appendix A.

b. Security of regulated sites must be maintained at all times.

c. Generators must respond to spills and have a written contingency plan.

d. The contents, hazards, and accumulation start date must be clearly marked on all hazardous waste containers.

e. Containers and equipment, such as generators, heaters etc., that hold fuel, oil, lubricants, coolant, waste oil, or other hazardous liquid, must either have secondary containment or be kept on an impervious surface, free of cracks, and inside a building.

f. Berms and secondary containment, which are subject to collecting rainwater, must be drained of rainwater as soon as possible after a rain event, and each discharge documented.

g. Waste must be removed from designated staging areas as follows.

(1) HWAAAs: Not later than (NLT) 90 days after the starting date listed on the container label.

(2) UWAAAs: NLT one year after the starting date listed on the container label.

(3) SGP: NLT 72 hours after the container (55 gallons or smaller) is full.

h. Generators must inspect and document inspection of regulated sites at least weekly. See Appendix B, Figure B-4, for a sample inspection log.

- i. Wastes must be segregated and separated for worker safety and disposal purposes.
- j. Hazardous waste containers must be continuously inventoried and properly managed. See Appendix B, Figure B-5, for a sample inventory log.
- k. Field exercises and temporary actions that have potential to generate spills or hazardous waste are subject to the standards listed above. Because these operations often take place in an open environment, extra precautions may be required on a case-by-case basis to ensure these operations have minimal impact. Generators must keep records of training, inspections, inventory, and spills.

CHAPTER 4. RESPONSIBILITIES

4-1. Commander. The Devens RFTA Garrison Commander is legally responsible for proper management of hazardous waste on the installation. The Commander appoints the Environmental Officer and the HWM.

4-2. DPW Environmental Branch. The DPW Environmental Branch plans for the management of the installation's hazardous waste.

4-3. Environmental Officer. The Environmental Officer is responsible for the staff work required to support the Commander in the performance of hazardous waste responsibilities.

4-4. Hazardous Waste Manager (HWM). The HWM provides technical guidance to hazardous waste generators, answers requests for information, prepares required reports, and checks to see that hazardous waste transported off post is received by the facility on the hazardous waste manifest. The following tasks are assigned to the HWM.

- a. Investigate management, reuse, recycling, reclamation, and disposal options for installation hazardous wastes, and assist DOL Supply branch in selecting appropriate options in accordance with installation policy for hazardous waste disposal decisions.

- b. Prepare regulatory guidance to ensure that installation facilities are aware of requirements necessary to manage hazardous waste in accordance with federal and state law, Army regulation, and Devens RFTA policy.

- c. In consultation with facility operators, develop projects and estimate the funding needed to correct violations of federal, state, or Army hazardous waste regulations.

- d. Develop projects that will minimize the installation's potential for future liability for hazardous waste sites caused by practices that are currently legal, but have potential for long-term negative environmental impact.

- e. Serve as a technical point of contact with state and federal regulators, addressing the concerns of regulatory agencies on enforcement actions and notices of violation (NOV).

f. Determine the need for, location, and type of regulated hazardous waste sites in concurrence with facility operators (installation activities, tenants, and contractors) and the Commander.

g. Review NEPA documentation required for field exercises and hazardous waste generating operations and provide technical assistance to the proponent.

h. Estimate future hazardous waste generation rates and funds needed for disposal.

i. Review, sign, and file all waste transport and disposal records including hazardous waste manifests, land disposal restriction forms, profile certifications, and federal or state mandated reports in accordance with state and federal policies.

4-5. Generators.

Commanders of staff, tenants, training units, and contractors are required to do the following.

a. Register hazardous waste generating operations with the HWM, formally open regulated waste sites, and formally close the sites when no longer needed by the activity.

b. Identify and characterize all hazardous wastes generated at least annually.

c. Complete all training required by this regulation.

d. Write a standard operating procedure, or add clauses to existing procedures, and/or establish and post a set of rules that clearly states the generator's policy and methods for ensuring continuous compliance with the requirements of this regulation.

e. Manage regulated operations, inspect regulated waste sites, and maintain records according to the procedures in this regulation.

f. Respond to spills of hazardous material or waste according to the Installation Spill Contingency Plan, Devens Regulation 200-1-1.

g. Coordinate all disposal and recycling requests from these sites through the HWM.

h. Assign an environmental coordinator on orders (military) or by memorandum of duty appointment (civilian) to manage the regulated waste sites.

4-6. Environmental Coordinator. Environmental coordinators for regulated waste sites are expected to carry out the following tasks.

a. Document and post rules established for the use of the regulated site.

b. Train new workers on the activity's hazardous waste operations.

- c. Check the deadline dates on full containers and coordinate turn-in.
- d. Plan for maintenance, improvements, spill prevention, and spill response.
- e. Inspect the regulated site weekly.

4-7. Environmental Team.

a. Concept. The environmental "team," "crew," or "squad" should be comprised of all the workers that use hazardous materials and/or generate wastes. It is essential for individual personnel to take an active role in developing an understanding of the safety and health risks associated with improper handling of hazardous materials and wastes, and after being properly trained, to take personal responsibility for properly managing the waste that they generate.

b. Primary Goal. The first goal of the group is to stimulate awareness in each member, of the health and safety concerns associated with handling hazardous materials. Thereafter, the goal is to keep this awareness at a high enough level that handling of hazardous materials or waste never becomes so routine that preventable, health and life endangering accidents occur.

c. Mission. The mission of the team members is threefold: to assist in developing the generator's hazardous waste rules; to make sure that everyone follows the established rules; and most importantly, to be vigilant protectors of each other's personal health and safety while working with materials that may seem common and familiar, but are nonetheless hazardous.

d. Tasks. These are typical daily tasks that either needs to be practiced by all or distributed among members of the environmental team on a rotating basis. Modify or add other tasks to this list as required, and post a list of rules in the work areas wherever it is necessary to give workers a visual reminder to "do the right thing."

- (1) Wear proper protective clothing and use proper protective equipment.
- (2) Carry a rag and wipe up drips on floor and equipment as soon as noticed.
- (3) Place a drip pan under leaking equipment as soon as noticed.
- (4) Especially in warm weather, check equipment for fill point leaks due to expansion.
- (5) Make sure that lids on waste containers and solvent cleaning equipment are closed.
- (6) Get help from another member and notify supervisor as soon as a spill is discovered.
- (7) Make sure that no one is mixing different wastes together.
- (8) Check partially full SGP containers for liquid level, spills, and leaks.

- (9) Make sure full SGP containers are moved to HWAA within 72 hours.
- (10) Put out new, properly labeled SGP containers when old ones are full.
- (11) Make sure unauthorized items are not being left in the SGP or HWAA.

CHAPTER 5. PLANNING

5-1. NEPA Documentation. The requesting activity will provide the following information for the Hazardous Waste Generator Identification (Figure B-1, Appendix B) before operating a regulated waste site.

a. Identify the chain of command names, addresses, and telephone numbers, identify the supervisor who is responsible for the hazardous waste generating activity, and designate the environmental coordinator.

b. Declare the type and quantity of waste to be generated, prepare a waste profile of each waste stream, and submit to the Directorate of Public Works (DPW) appropriate plans for responding to any unit specific operation emergencies that are not covered in the Installation Spill Contingency Plan (ISCP).

5-2. Hazardous Waste Training.

a. All personnel who handle or manage hazardous waste, within six months of assignment to the position, must be sufficiently trained to ensure that the activity's facilities can maintain compliance with federal and state regulations. For additional information on personnel training in hazardous waste refer to the Hazardous Waste Personnel Training Plan, DRFTA Regulations 200-1-3.

b. Personnel may not handle or manage hazardous waste unsupervised until environmental training has been completed. Training must be reviewed annually, and records of initial and refresher training must be maintained on file at the activity. At a minimum, environmental training shall include the applicable requirements of 29 CFR 1910.

c. Formal training is conducted by the 94th RRC. In coordination with the 94th RRC, DPW shall publish an annual schedule of their formal training dates. Contact the 94th RRC Environmental Office at (978) 796-2508 or DPW Environmental for further information. Individual training requirements are as follows.

(1) On-the-job training by organization personnel who are knowledgeable of the activity waste operations, coupled with attendance at the training course entitled "Environmental Awareness Training" (24 hours), meets the requirement for initial training.

(2) Attendance at the training course entitled "8-Hour Refresher," meets the requirement for annual review of formal training.

d. All personnel who prepare hazardous waste for transportation off-site shall receive required DOT training.

5-3. Establishing a Regulated Site.

a. Hazardous Waste Generator Agreement. The generator will read and sign a copy of the Hazardous Waste Generator Agreement included at Appendix B, Figure B-1. This document attests to the fact that the activity leadership, supervisors, and individuals agree to minimize generation of hazardous waste, maximize reuse and recycling options whenever feasible, and manage necessary hazardous waste streams in a responsible manner which follows Army environmental policy.

b. Site Designation. The HWM will visit the site of operations, assist the activity in designating an appropriate location for the regulated waste site(s), provide and review the Devens RFTA requirements with the generator, and assist the generator, as necessary, in determining the hazardous waste profile of each waste stream.

5-4. Spill Contingency Plan. All personnel who are involved in the management of hazardous waste should be familiar with the procedures to be followed in case of a spill or release of hazardous waste. Spill planning requirements and procedures are discussed in Devens RFTA Regulation 200-1-1, the ISCP.

5-5. Closure Plan. Regulated waste sites are not closed frequently, and closure of these sites requires some planning. A general closure plan is on file at the DPW Environmental Branch. Refer to 7-4 Closure Inspection. Tenants who depart Devens RFTA (either through MOB or Relocation or other) shall initiate closure of their Regulated Waste Site. HWM will monitor the closure process, document actions taken, collect all records from the generator, and prepare a closure record for the generator to sign. Do the following when a regulated site is no longer needed by the activity.

a. Notify the HWM as soon as the need for closure is known. The HWM will give the generator specific closure guidance. All of the following actions must be completed before the property is turned over to the installation.

- (1) The site must be cleaned and inspected.
- (2) Damaged property must be sampled and remediated, if spills cannot be cleaned.
- (3) The closure must be documented in writing.

b. To ensure that all tasks may be completed before turn-in, the generator should plan to coordinate with the HWM at least 30 days before closing a regulated site.

CHAPTER 6. OPERATIONS

6-1. General.

- a. Requirements for construction and set-up of the HWAA and the SGP are located at Appendix A.
- b. HWAA Security, Container Labeling, Secondary Containment, and Waste Removal are explained in Sections 6-2 through 6-5 of this chapter.
- c. Section 6-6 explains the operational differences between the HWAA and the SGP, and Section 6-7 discusses the newest form of accumulation site for hazardous waste, the UWAA.
- d. HWAA Inspections, Waste Separation and Segregation, and Container Management are discussed in Chapters 7, 8, and 9.
- e. Field exercises and other temporary actions which have potential to generate waste in the open environment are discussed in Chapter 10, which states the special procedures that must be followed to prevent environmental impacts to Devens RFTA grounds, training areas, and ranges.
- f. Chapter 11 discusses hazardous waste record keeping requirements.

6-2. Security.

- a. Hazardous waste is prohibited from any location, which is not a designated HWAA or SGP, regardless of the origin of hazardous material or waste discovered at the activity's location. The activity will be held responsible for managing and disposing of the item in compliance with all federal, state, and Army regulations. Security is the key to avoiding the cost and frustration of dealing with abandoned materials and waste.
- b. The activity will establish security measures that prevent placement of hazardous waste into unauthorized areas, and prevent unauthorized access to hazardous waste within the HWAA. The following minimum-security measures are mandatory.
 - (1) Gated areas must be locked when unattended.
 - (2) HWAA's including waste oil tanks must be locked at all times.
 - (3) Containers must be closed at all times, except when adding to or removing from the container. An open container is a violation of state and federal regulations.
 - (4) Leaking/deteriorated containers must either be transferred to an overpack or the material in the container transferred to a sound container as soon as a leak or deteriorated condition, such as bulging, seepage, wetness or other sign of loss of container integrity, is discovered.

(5) In the event of a hazardous waste spill emergency, the generator must immediately activate the ISCP, and any special emergency plan set up specific to the activity's operations. For smaller spills, which are not an emergency, the generator should begin cleanup and contact the HWM immediately for guidance.

6-3. Marking and Labeling Containers.

a. Labels must be filled out with permanent ink (ink that does not wash off with water, or easily fade).

b. The generator must label the container with a Massachusetts approved hazardous waste label provided by the HWM as soon as the first amount of hazardous waste is placed into the container. This label must be placed on the side of the container facing outward so that an inspector can view it easily. The following information is required.

(1) Name of Waste. Enter the common name of the contents and composition of the waste in the container.

(2) Hazard(s). List the hazard associated with the waste (ignitable, toxic, corrosive, reactive and/or specific hazardous waste numbers such as D001, MA01, or D008). Appendix C contains a listing of the types of waste normally generated at DRFTA along with the hazard waste numbers.

(3) Accumulation Start Date. Enter the MONTH/DAY/YEAR as specified below.

(a) SGP Container. Enter the date that the container became full. Containers, which are not full, should not be dated. Once a container has been dated, do not change the date. The full date is the first day of accumulation. Therefore, if the full container at the SGP is dated and then it is moved to the HWAA two days later, the date should not be changed to the date that it was placed into the HWAA.

(b) HWAA or UWAA Container. If not already dated, enter the date that the container was placed into the area.

(c) Waste oil tank. When the tank is first put into service, enter the date that the first drop of waste oil is placed into the tank. At all other times, enter the date the tank was last emptied.

(d) TID Number. When the waste is turned in, the document number assigned by the HWM should be marked on the top or side of the drum.

(4) A DOT shipping label and hazard class label must be placed next to the hazardous waste label prior to shipping. The hazardous waste contractor will perform this task.

6-4. Operation of Secondary Containment. Whenever a drip pan or other temporary containment, secondary containment structure for a waste oil tank or SGP, or other berm, which

is subject to collecting rainwater, fills with rainwater, take the following steps to properly release rainwater.

- a. Remove all oil sheens with absorbent pads.
- b. Handle absorbent pads as hazardous waste.
- c. Drain non-contaminated rainwater to the ground.
- d. Keep a record of the rainwater removal from containment berm. Include the following:
 - (1) Date and time of the removal.
 - (2) Presence of sheen, and the corrective actions taken.
 - (3) Name of personnel removing the rainwater.
- e. The drain valves on secondary containment berms must be kept closed at all times other than when draining clean rainwater.
- f. Do not drain any rainwater to the ground that contains a state or EPA regulated hazardous material or hazardous waste. Do not drain rainwater to the sanitary sewer.

6-5. Waste Removal.

- a. Containers and waste oil in tanks must be removed from Devens RFTA HWAAAs to a licensed recycling or disposal facility within 90 days of the accumulation start date.
- b. Containers must be removed from Devens RFTA UWAAAs to a licensed recycling facility within one year of the accumulation start date.
- c. All disposal or recycling arrangements are made through the HWM.
- d. The process of transporting and disposing of hazardous waste is initiated when the generator moves a container to the HWAA and calls the HWM.
- e. The generator **MUST** call the HWM as soon as the drum enters the HWAA, or in the case of a spill, as soon as the spill occurs. (This allows the maximum time for processing, and also serves to keep track of the drum after it has been placed in the HWAA.)
- f. Most waste is disposed or recycled through the DRMO at Groton, Connecticut.
- g. A TID, DD Form 1348-1a, with assigned document number must accompany every order for hazardous waste removal.

(1) The HWM completes a TID, assigns a document number, and logs in the order.

(2) The HWM submits the TID to the DRMO, and reports the assigned document number to the generator.

(3) The generator marks the TID document number onto the drum.

h. Delivery order and pickup.

(1) The DRMO issues a delivery order to the hazardous waste contractor who picks up the waste at the generator's HWAA location, and transports it to a permitted hazardous waste transportation, storage, and disposal facility (TSDF).

(2) Pickup. The generator shall call the HWM to determine when the pickup is scheduled and plan to be on hand to unlock the HWAA on the date of pickup.

6-6. Operation of the SGP. In general, the HWAA security, spill, labeling, and inspection requirements apply to the SGP also. The following operational elements apply only to the regulation of the SGP.

a. Point of Generation. SGP must be located close to the process, which generates the waste.

b. Control. Each SGP must be under the control of a key individual(s) directly responsible for the process, which generates the waste.

c. Number of Containers. Only one container for each type of hazardous waste (also referred to as a waste stream) is allowed at the SGP at any one time. Full containers must be moved from the SGP to a HWAA within 72 hours. Because of the single container limit, a new container may not be placed in the SGP until the full one is removed.

d. Volume of Containers. The maximum capacity of each container of waste oil or hazardous waste may not exceed 55 gallons. The maximum capacity of each container of acutely hazardous waste may not exceed 1 quart. Contact the HWM for assistance in determining if a waste is acutely hazardous.

e. Container Label. The container label must not be dated in the SGP, because accumulation time does not begin until the container is full.

f. If the SGP is located in the field the containment must be checked regularly for rainwater.

6-7. Universal Waste Accumulation.

a. Universal wastes are selected members of the subset of hazardous wastes that are recyclable. The EPA and MA DEP have determined that until the process of recycling or reclamation begins, these recyclable, hazardous wastes pose less of a threat to health and safety than other hazardous waste streams. In order to discourage disposal and encourage the development of the recycling industry for these items, the requirements for managing these wastes have been relaxed. Listed below is a brief summary of these requirements. A more detailed description can be found in the Universal Waste Standard Operating Procedure for Devens RFTA.

b. The list of universal wastes in Massachusetts includes batteries, pesticides, thermostats, mercury containing devices, and mercury containing lamps. The listed item must meet the characteristics of a hazardous waste before it can be designated as a universal waste. Therefore, not all batteries, pesticides, or lamps are universal wastes.

c. Universal waste generators are called handlers. The handler generates and collects universal waste only. The HWM is responsible for inspecting the handlers to ensure proper management of the universal waste and arranging reclamation or recycling. All reclamation and recycling operations are done off-site.

d. Handler Requirements.

(1) A handler may accept shipments from other handlers in order to consolidate larger quantities for eventual shipment to a recycler.

(2) A hazardous waste transporter license is not required for shipments from one handler to another, although the shipper must comply with all DOT regulations.

(3) A handler may ship only to another handler that is accumulating the waste for shipment, or to another handler that is licensed to recycle the specific universal waste stream being accepted. The license may be either a TSDF permit or a Class C Permit for recycling.

(4) Handlers must keep a record of each universal waste shipment received or sent for at least three years.

(5) As much as 5000 pounds of a universal waste intended for recycling may be accumulated on the handler's site at one time.

(6) Waste may be accumulated for up to one year. Containers must be labeled with the name of the waste, the date that the waste was placed into the accumulation area, and the designation Universal Waste.

(7) Universal wastes must be kept separate from other materials in a location marked Universal Waste Accumulation Area. A universal waste may not be kept at the HWAA, because

it is not considered to be a waste yet.

e. Establishment of a Universal Waste Accumulation Area. Activities wishing to establish a UWAA or to bring waste to another UWAA on the installation should contact the HWM.

CHAPTER 7. INSPECTIONS

7-1. Weekly Inspections. The generator must inspect all regulated waste sites weekly. See sample Weekly Inspection Log at Appendix B, Figure B-4.

a. Inspector should look for the following.

(1) Evidence of container leaks, dents, bulges, punctures, corrosion, or other deterioration, and opened or unsecured lids or bungs.

(2) Proper aisle space, labels oriented toward inspector, separation of incompatible waste. Appendix D contains a listing of materials, which should be separated from other materials.

(3) Proper container markings, containers without assigned TID serial numbers, container dates past the 90-day accumulation date.

(4) Sufficient supply of spill response materials, and proper functioning of emergency equipment. Evidence (signature/date) of inspection of emergency equipment should be at or near the emergency equipment.

b. Inspection results must be documented and kept on file for three (3) years. All noncompliance issues should be corrected at once, and inspection results maintained at the activity, with a copy forwarded to the HWM monthly.

c. A Devens RFTA inspection form and checklist, which identifies the unit and the regulated waste site with provision for recording a month of weekly inspections, will be provided to the unit when the activity becomes registered with the DPW Environmental Branch. An example is located at Appendix B, Figure B-4.

d. Upon request, generators will allow the DPW Environmental Branch, and federal or state inspectors or their authorized representatives to view the inspection files.

7-2. Staff Assistance Visits. The primary purposes of the staff assistance visits are to keep the generator informed of new environmental requirements and programs, and to keep the environmental staff informed about changes in the generator's mission and generation status.

a. The DPW environmental staff will provide at least two scheduled staff assistance visits annually.

(1) The first staff assistance visit will include discussion of the generator's overall mission, distribution of environmental record keeping materials and compliance information, and a walk

through of operations and waste areas.

(2) The second visit may include sampling to characterize the hazardous components of certain waste streams.

(3) Typical subsequent visits will include a facility walk through and an inspection of training and inventory records. Time for discussions about specific concerns of the activity, and new pollution prevention ideas and programs will also be included.

b. The generator will be advised of compliance violations at the time of the visit.

(1) Serious issues of noncompliance not resolved within a reasonable period of time, dependent upon the nature of the violation, will be identified to the HWM and Environmental Officer.

(2) Serious or chronic noncompliance issues, such as multiple or repetitive violations which are not resource limited, will be identified to the installation commander and forwarded through the chain of command to the activity commander.

7-3. Compliance Inspections. Federal and state environmental inspectors may inspect the installation at any time.

a. Violations of federal or Commonwealth of Massachusetts regulations are reported by the MA DEP to the Installation Commander in writing as a NOV.

b. Systemic problems, those that in some way indicate a generalized lack of regulatory awareness or training or an established disrespect for a rule (whether intentional or not), are usually considered more worthy of assigning a violation. Therefore, it is imperative to use a systematic approach to management of hazardous waste containers. Pay close attention to details, and let the HWM know early on if you are not sure about any regulatory matter.

c. The following items are nearly always part of a compliance inspection.

(1) Physical inspection of the facility, containers, and container labels.

(2) Inspection of the records including Manifests, Material Safety Data Sheets (MSDS) for hazardous materials, weekly inspection reports, HWAA inventory record, the spill plan, and training records.

d. Whenever you are involved in this type of inspection, make every effort to correct problems on the spot when a regulator points them out. It does no good to argue with the regulator about your understanding of the rule, or whether or not the rule is fair, even if the regulator agrees with you.

e. Good housekeeping, thorough weekly inspections, timely follow-up on noncompliance issues, well-maintained records, and a cooperative attitude toward compliance will go a long way toward making these inspections a positive experience.

f. Compliance inspections are generally unannounced. Therefore, generators must be prepared at all times.

7-4. Closure Inspection.

a. When this activity ceases operation of a regulated waste site, the HWM will inspect the empty area and surrounding grounds prior to cleaning and closure.

b. The generator shall ask the HWM for closure guidance at least 30 days prior to site closing.

c. The HWM will monitor the closure process, inspect the cleaned area, and verify that this area has been closed.

d. Inspection and verification of the closure of the HWAA, waste oil tank, or SGP will be documented in writing and signed by the generator and the HWM.

CHAPTER 8. WASTE SEPARATION AND SEGREGATION

8-1. Segregation of Waste Types.

a. Hazardous wastes are not to be mixed in the same container with any other type of hazardous or nonhazardous waste or with any other material, see Appendix D.

b. Separate containers are required for each type of waste generated or accumulated. For example, waste oil, brake fluid, solvent, and antifreeze will each require a separate container.

8-2. Separation of Containers.

a. Aisle spacing must be sufficient to allow inspection of each row of containers. Containers must be oriented so that a waste handler, inspector, or firefighter may easily read the label.

b. Aisles for ignitable or reactive hazardous waste containers must be at least 4 feet wide.

c. Containers holding ignitable or reactive hazardous waste must be placed within 12 feet of the aisle.

d. Containers equal to or smaller than 5 gallons may be stacked no more than two containers high. Containers larger than 5 gallons are not to be stacked.

8-3. Segregation from Materials. Usable materials, hazardous or nonhazardous, are not to be kept within the HWAA.

8-4. Separation of Incompatible Wastes. Within the HWAA, certain hazardous wastes may react with one another to create dangerous conditions such as heat, fire, explosion, or poisonous vapors. These wastes are considered to be chemically incompatible.

a. A hazardous material incompatibility chart is located at Appendix D. The subject of incompatibility can be very confusing. The incompatibility chart is included only to remind you that all hazardous wastes are not alike. Incompatibility is part of why they are called hazardous.

b. Activities that generate waste or use hazardous materials, must contact the Safety Office for guidance on safe management of chemically incompatible materials and wastes.

c. Containers of incompatible wastes must be placed in separate sections of the HWAA.

d. Compatible wastes. Certain wastes such as combustibles and flammables, e.g., fuels, lubricants, solvents, paints, and thinners may be stored together without risk of creating dangerous conditions. These wastes may be kept in the same section of the HWAA. The Safety Office can determine which of your wastes may be stored together.

8-5. Separation from Ignition or Reaction Sources.

a. Ignitable and reactive wastes must be prevented from igniting or reacting. These wastes (including vapors) must be protected from ignition sources such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, static, electrical or mechanical sparks, radiant heat, and heat from chemical reactions. These should also be separated from the specific reaction sources stated in the MSDS for the original material.

b. Ignitable and reactive waste must be stored at least 50 feet away from the installation property line. Therefore, if an activity's property includes an installation boundary line, the HWAA or SGP for the activity must be placed at least 50 feet away from that boundary line.

CHAPTER 9. CONTAINER MANAGEMENT

9-1. Inventory. The activity must keep at the site a log, which records each container that is placed into or removed from the HWAA. Use the Hazardous Waste Inventory Form in Appendix B, Figure B-5.

9-2. Condition. Hazardous wastes must be held in containers, which are in good condition and are compatible with the waste. Containers must be free of leaks, rust, and deterioration, and have no apparent structural defects.

9-3. Open Containers. Hazardous waste containers must be closed at all times. Containers may only be opened when waste is being added or removed and must be closed immediately afterwards. Open hazardous waste containers are a violation of federal and state hazardous waste regulations.

9-4. Empty Containers. Contact the HWM to determine if an empty container is a hazardous waste.

9-5. Liquid Waste Containers. Liquid wastes are to be held only in tight head (bung-type) drums/containers. To prevent overflow, due to expansion, leave the following headspace.

- a. 55-gallon drum—3 to 4 inches.
- b. 5-gallon cans—1.5 to 2 inches.
- c. 1-gallon cans—1 inch.

9-6. Overpack Containers. An overpack container is used to hold a leaking, corroded, or otherwise deteriorated container. When using overpack containers, adhere to the following guidelines.

a. Overpack containers must be durable, nonleaking, and constructed to safely contain the material being placed into it. One of the following options will usually be used.

(1) Liquids. When overpacking containers of liquid wastes, place enough inert absorbent in the overpack container to absorb any liquid that could leak out of the original container.

(2) Solids. When overpacking nonliquid wastes, it is usually sufficient to simply place the damaged container in an appropriate overpack container.

(3) The contents of a leaking container may be transferred into a new container instead of overpacking.

b. Overpack containers must be labeled and marked in the same manner as all hazardous waste containers.

c. Overpack containers must be kept closed at all times. Both the lid and the retaining ring must be in place and tightened for the container to be considered closed.

d. For assistance in determining the appropriate size and type of overpack container, or to determine if an emptied container is a hazardous waste contact the HWM.

CHAPTER 10. FIELD EXERCISES AND/OR TEMPORARY ACTIONS

10-1. Authority. Actions taking place on the Devens RFTA grounds, however short in duration, are subject to federal, state, and Army hazardous waste regulations.

10-2. Applicability. Requirements contained in this chapter apply to all Devens directorates, military units, contractors, civilian law enforcement agencies, state and federal government agencies, researchers, etc., that conduct operations at Devens RFTA facilities, grounds, training areas, and ranges located on South Post, Main Post, and North Post. Although military terms are used frequently in this chapter (such as commanders, soldiers, units, training, and exercise) responsibilities and requirements apply to all civilian users, leaders, and activities as well.

10-3. NEPA Documentation. NEPA documentation is required for each operation or exercise.

a. **Command Responsibility.** It is the responsibility of the commander to analyze the intended mission for possible environmental impact and prepare accordingly.

b. **NEPA Document.** The simplest form of NEPA documentation, a Record of Environmental Consideration (REC), signed by the commander of the unit and a representative of the Devens RFTA Environmental Staff, will be sufficient for most field exercises. See sample form at Appendix B, Figure B-2.

c. The document must detail the amount and type of hazardous materials to be used, as well as all environmental impacts that the mission might reasonably be expected to generate.

d. This document should be submitted to the DPW Environmental staff NLT 30 days prior to conducting operations in the field or at Devens facilities.

e. Requests to Range Control for spill containment/response materials shall be made in advance. After the mission has begun these requests should be limited to unforeseen needs caused by changes in the mission, etc.

10-4. Spill Contingency Planning. Commanders must ensure, before the training begins, that the potential for fuel, oil, and hazardous material spills has been minimized, that the unit is equipped to respond to spills, and that all soldiers know how to report a spill and initiate cleanup. The unit will bear the cost for spill containment, response materials, contractor assisted clean up (if required), and hazardous waste disposal. The following precautions, completed at or before the outset of training, are mandatory:

a. The commander must distribute to all unit members, a written emergency spill procedure which clearly specifies the process for reporting a spill to the installation, and for initiating spill response and cleanup. See Spill Quick Reference in Appendix E.

b. Stationary equipment, such as generators, heaters, climate control equipment, fuel tankers, etc., that contain fuel or other releasable hazardous substance must have secondary containment.

10-5. Spill Response.

Units must contain and report all spills.

- a. Spill response materials such as loose absorbent, absorbent pads, shovels, and empty drums must be immediately available to soldiers at all training areas and on all fuel tankers.
- b. Soldiers must be fully capable of responding to spills, must know where spill response items are located for each operation, and must begin containment immediately upon discovery.
- c. Every spill of oil or hazardous material must be reported to Range Control immediately upon discovery, no matter how small or insignificant the spill may appear.
- d. Written reports for all spills and all hazardous spill debris must be turned in to Range Control before the training area is cleared.

10-6. Specific Operations. The operations listed here are those that have been most commonly associated with hazardous material releases on the grounds and training areas of the Devens RFTA. Most of these releases could have been avoided if the user had followed the precautions stated here. The preventive practices listed here are mandatory.

a. Fuel Transfers.

(1) Equipment and Vehicle Fill Ports. Overflow of generator fill ports, caused by expansion of fuel, is the leading cause of all spills during training exercises.

(a) Under no circumstances fill equipment and vehicle fuel tanks, fuel bladders, and fuel tankers to more than 90% capacity.

(b) Good judgment should be exercised in determining how much fuel will be placed in each piece of equipment or vehicle. Sufficient headspace must be provided to allow for expansion of the specific fuel being used under the maximum temperature conditions to which it may be exposed in the field. Under certain conditions this may mean less than 90% of capacity.

(c) Vehicle refueling operations. All refueling of vehicles on the South Post will be conducted at designated refuel points located on training areas 9A, 10A, and 14A.

(d) Refueling of stationary items. Refueling of heaters, generators, and other equipment may be conducted in the field using sufficient containment under the refueling operation to ensure that fuel is not allowed to flow onto the ground surface.

b. Maintenance Operations. Emergency maintenance operations involving failure of lines that contain fuels or hydraulic fluids (both rigid piping and flexible hoses), are the leading cause of large spills during training exercises.

(1) All planned or emergency maintenance operations involving items that contain fluids must be conducted on impervious surfaces with provision for containing the fluids that may overflow or may need to be removed from the item undergoing maintenance.

(2) An impervious surface can be established by placing under the maintenance item, a sheet of heavy-duty plastic, berm liner, or other impermeable tarp, which extends to a radius of at least 15-20 feet.

(3) To contain potential overflow fluids, a rigid containment pallet can be placed on the impervious surface, directly under the item; or one or more open-head drums or half drums can be placed on the impervious surface near the item containing the fluid.

CHAPTER 11. RECORDS

11-1. Regulations and Record of Registration. The activity will maintain a copy of Devens Regulations 200-1-1, (the Installation Spill Contingency Plan), Devens Regulations 200-1-3 (the Hazardous Waste Personnel Training Plan), this document (Devens Regulations 200-1-2) and also a fully signed Hazardous Waste Generator Agreement at the activity.

11-2. Operational Records. A copy of the following records will be maintained on file at the activity, and a copy forwarded to the Environmental Officer on a regular basis.

- a. Training. Include a list of employees, dates that training occurred, and copies of certificates received by each employee. Forward the list to HWM annually.
- b. Inspections. Results of weekly and compliance inspections should be recorded on the Inspection Checklist and forwarded to the HWM monthly.
- c. Inventory Record. Post an inventory log of all hazardous waste items, which enter and leave the HWAA. Forward completed pages to the HWM annually.
- d. Spill Reports. Report all spills by telephone and forward written record to the HWM within two days of the occurrence of the spill.

OFFICIAL:


CARYN SUZANNE HEARD
LTC, EN
Commanding

DISTRIBUTION:
Devens Web Site

APPENDIX A. SETUP OF REGULATED SITES

A-1. Hazardous Waste Accumulation Area (HWAA).

a. Construction. Each HWAA must meet state hazardous waste regulation construction specifications for HWAA's.

(1) Containers. This requirement will be met for container storage by using only prefabricated white hazardous waste storage buildings, which meet state and federal requirements unless otherwise approved in writing by the DPW Environmental Division Chief.

(2) Tanks. Waste oil tanks must have secondary containment, and must be registered with and approved by the Devens RFTA Aboveground Storage Tank (AST) Manager.

b. Equipment. Each HWAA must have proper signs, spill response materials, and emergency communication and fire fighting equipment. The following markings, signs, and equipment establish the location of the HWAA, and allow for proper control of its associated hazards:

(1) Boundary. A boundary line, fence or gate which distinguishes the HWAA from satellite generation points and other areas of the facility.

(2) HWAA Sign. A sign which presents the words "CAUTION: HAZARDOUS WASTE ACCUMULATION AREA, AUTHORIZED PERSONNEL ONLY" in capital letters at least one-inch high. Waste oil tanks must also be marked in bold letters, "NO SMOKING WITHIN 50 FEET".

(3) Emergency response poster. A poster, which lists the telephone numbers of people/organizations to call in case of a spill or emergency. At a minimum, the poster should include the applicable information in the Spill Quick Reference in Appendix E.

(4) Hazard Warning Sign. A sign, which denotes the hazard class of each type of hazardous waste kept in the area, is required. Contact the Safety Office to determine which signs are required.

(5) Spill contingency materials. The minimum requirement for spill contingency materials includes: an empty 55-gallon overpack drum, push broom and flat head shovel, loose absorbent, absorbent pads, and rags sufficient to contain and manage a spill of several gallons.

(6) Fire extinguishers. The activity should request the Fire Inspector to assess the site to determine the number and type of fire extinguisher(s) needed.

c. Emergency communications. The activity must have emergency communication equipment to enable the generator to contact others in the operations area if an emergency situation (accident, fire, etc.) arises at the HWAA.

A-2. Satellite Generation Point (SGP).

a. Construction.

(1) SGP must be located at or near the point of generation. A separate building cannot be used for this purpose. Generally an area is marked off on the floor.

(2) SGP must have secondary containment for containers to minimize future cleanup costs.

(3) SGP must be protected from the weather if it must be located outside, such as when the operation is located in the field.

b. Equipment. Sign and equipment requirements are similar to those for the HWAA except that the term "Hazardous Waste Accumulation Area" should be replaced with "Satellite Generation Point."

APPENDIX B. SPECIAL FORMS

RECORD OF ENVIRONMENTAL CONSIDERATION

Military Training at DRFTA South Post Training Area
COMPLETE THIS FORM and return to the DRFTA, DPW Environmental Branch TODAY, or Mail to DRFTA, ATTN: IMNE-DEV-ISS 30 Quebec Street, Unit 10 Devens, MA 01434-4424 ATTN: Tom Poole NLT: 30 Days Prior to Training or FAX: 978-796-2557. Direct questions to Tom Poole, Comm: 978-796-2747/DSN: 256-2747.

I. Organization Identification		
Unit/Activity Address Commander		
II. Points of Contact	Name	Telephone/FAX
Environmental Coordinator		
Alternate Environmental Coordinator		
Unit Training NCO		
Unit Administrator		

III. Environmental Considerations * Complete Part A. and Part B. (Part B. is located on page 2.)	
Part A. GENERAL Environmental Concerns. Circle all that apply.	
GREYWATER ACTIVITIES	Food Service Shower/bath/laundry Decon Other (specify): NONE
VEHICLES AND EQUIPMENT: Spill response materials required. If refueling, a refueling plan is required. Vehicles to be refueled at Refuel Sites 9A,10A,14A only. Stationary equipment requires spill containment. Leaking vehicles require drip pans.	Fuel Tanker Fuel Bladder Tactical Vehicles Tracked Vehicles POVs Aircraft Generators Tent Heaters Other (specify): NONE
FUELS. All fuel containers must have 110% containment.	Gasoline Diesel JP8 Other fuel (specify): NONE
HAZARDOUS WASTE GENERATING PROCESS Waste disposal must be coordinated with Range Control before the end of the training event. (Do not take HAZMAT off Devens)	1) X-ray machine: yes no Haz Waste: 2) Process: Haz Waste: 3) Process: Haz Waste: NONE
HAZARDOUS MATERIALS (MSDS may be required for these items)	1) 2) NONE

IV. RECORD OF ENVIRONMENTAL CONSIDERATION Determination. Sign this section after completing sections I, II, III A., and III B.	
Event Type 1.	Governing NEPA Document _____ OR _____ Categorical Exclusion
Event Type 2.	_____ OR _____
Event Type 3.	_____ OR _____
Unit/Activity Official Signature _____	Date _____
Environmental Official Signature _____	Concur Nonconcur Date _____

Record of Environmental Consideration

Military Training at DRFTA South Post Training Area	
III. Environmental Considerations (continued)	
Part B. SPECIFIC Environmental Concerns. Complete Part III B. for each <i>different type</i> of training event planned for this season.	
Describe the type of training in each block below. Include potential impacts to the environment such as: soil erosion (e.g., excavation), oil/hazmat spills (e.g., fuel distribution). Attach any documentation such as waivers or permits required to perform specific activities.	
Training Event Type 1 TITLE:	Dates
Description of Training:	<hr/> <hr/> <hr/> <hr/>
Training Event Type 2 TITLE:	Dates
Description of Training:	<hr/> <hr/> <hr/> <hr/>
Training Event Type 3 TITLE:	Dates
Description of Training:	<hr/> <hr/> <hr/> <hr/>

Devens Reserve Forces Training Area Hazardous Waste Generator Agreement

We, the undersigned, understand the objectives of Army waste management, which as identified in AR 200-1 Environmental Protection and Enhancement are to:

- *Promote the protection of public health and the environment by complying with all applicable laws and regulations.*
- *Minimize the generation and toxicity of waste.*
- *Conserve valuable material and energy resources.*
- *Promote the reuse, recycle, and reprocessing of material resources whenever possible.*

We agree to abide by the Army policies and major RCRA program requirements set forth in AR 200-1 which state that Army activities and tenants will:

- *Comply with applicable federal, state, and local regulations and installation policies.*
- *Establish local procedures and responsibilities for execution of the waste management program.*
- *Minimize wastes according to specified waste reduction and recycling goals programs.*
- *Ensure that waste generation and accumulation facilities meet all applicable codes and are designed and constructed to prevent releases to the environment.*
- *Fund hazardous waste disposal costs.*

Signature

_____	Commander
_____	Supervisor, HW Generating Operation
_____	Environmental Coordinator
_____	_____
_____	_____
_____	_____

WEEKLY CONTAINER STORAGE INSPECTION LOG
 Activity-Environmental Coordinator
 555 Any Street

Storage Area ID Number: 100

Month: _____

Inspection Date	Oldest Start Date	Number and Type of Containers		Inspector's Initials
		55 Gallon	1 Gallon	
		5 Gallon	Small Containers	
		55 Gallon	1 Gallon	
		5 Gallon	Small Containers	
		55 Gallon	1 Gallon	
		5 Gallon	Small Containers	
		55 Gallon	1 Gallon	
		5 Gallon	Small Containers	
		55 Gallon	1 Gallon	
		5 Gallon	Small Containers	

Inspect Container Lids, Condition, Markings; Waste Placement; Emergency Supplies

Container Lids –Closed !

Ignitable or Reactive wastes ≥ 50 feet from property line !
 Incompatible wastes –Separated !

Container Condition –Good !

- No evidence of leaks
- Containers not dented, crushed, or punctured
- No evidence of corrosion (pitting, severe rust/deterioration other than minor surface discoloration)
- General condition of containers is good

Container Markings –Proper and Visible !

- Check Oldest Start Date !!!
- Red Hazardous Waste label on each container (Filled out completely – name, hazard, date)

Emergency Equipment –Good Condition !

- Fire Extinguishers
- Alarms
- Spill Response Materials

Description of any problems found and all actions taken (specify dates)

Figure B-4

HAZARDOUS WASTE INVENTORY LOG

Post this document at the hazardous waste accumulation area until completed. Save completed record with your hazardous waste management records.

Building	Organization	Activity	Environmental Coordinator/Telephone	Site ID	
Drum #	Start Date Initials	1348-1 Document Number	Common Name of Waste	Type and Size of Container	Removal Date Initials
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					

APPENDIX C. LIST OF TYPICAL HAZARDOUS WASTE STREAMS

Name of Waste	Hazards	Possible Profiles
Acid Spill Debris	Corrosive D002	149-A
Aerosol Pesticides Flammable	Ignitable D001, Toxic	435-C
Aerosol Pesticides Non Flam	Toxic	435-B
Antifreeze for Recycle	Toxic MA01	989-M, 989-L(sludge)
Asbestos Brake Shoes	Toxic-asbestos	800-A
Batteries, Alkaline	Toxic MA99	927-A, 927-B(carb)
Batteries, Lead Acid	Corrosive D002 Toxic D008	117-E(reclam);117-B
Batteries, Lithium	Reactive D003	727-A
Batteries, Magnesium	Toxic D007	727-B
Batteries, Mercury	Toxic D009	727-C
Batteries, NiCad	Toxic D006	217-B(wet),727-E
ChemBiol Mask Filters	Toxic D007, D011	760-A
Cleaner/Degreaser, Solvent	Flisted F001 Ignitable F003/D001 Toxic, D040	411-A
Diesel/Gas/Soil/Speedidri/ Pads	Toxic D018	649-A
Oil and Fuel Filters (Recycle	Toxic MA01	979-B
Waste Fuel (Diesel/JP8)	Ignitable D001 Toxic D018	610-B
Waste Fuel (Gasoline/JP4)	Ignitable D001, Toxic D018	610-A
Waste Oil For Recycle	Toxic MA01	989-A, 989-C(refrig)
Grease/Waste Oil/Fuel /Water	Toxic MA01	989-E (grease/prts)
Aqueous Parts Cleaner w/Grease	Toxic MA01	959-B(water)
Waste Oil/Speedidri/Spill Debris	Toxic MA01	610-B, 949-D
Waste Paint	Ignitable D001 Toxic D008, D006, D007	416-D

APPENDIX D. WASTE COMPATIBILITY INFORMATION

D-1. Hazardous Materials/Waste Storage Separation Chart.

- a. Substances in the left hand column must not be stored with substances in the right hand column.
- b. Substances in bold have detailed example lists in Section D-2.

If the material contains:	It may not be stored with any of the following:
Acid (pH below 2.0)	Caustics (pH above 12.5) Reactive Metals Alcohol Water Aldehydes Halogenated, Nitrated, or Unsaturated Hydrocarbons Reactive Organic Compounds and Solvents Spent Cyanide and Sulfide Solutions Oxidizers
Caustic (pH above 12.5)	Acid (pH below 2.0) Reactive Metals Alcohol Water Aldehydes Halogenated, Nitrated, or Unsaturated Hydrocarbons Reactive Organic Compounds and Solvents
Reactive Metals	Caustics Acids Alcohol Aldehydes Halogenated, Nitrated, or Unsaturated Hydrocarbons Reactive Organic Compounds and Solvents Oxidizers
Reactive Organic Compounds and Solvents	Caustics Acids Reactive Metals
Spent Cyanide and Sulfide Solutions	Acids
Oxidizers	Acetic or Other Organic Acids Concentrated Mineral Acids Reactive Metals Reactive Organic Compounds and Solvents Ignitable [Flammable/Combustible] Wastes*

* "Ignitable" in this context refers to substances with a flashpoint below 140° F, and includes:

- Combustible substances with a flashpoint below 140° F
- Flammable substances with a flashpoint below 100° F.

c. negative consequences of some combinations

Acids + Oil or Grease = Fire	Flammable Liquids + Hydrogen Peroxide = Fire/Explosion
Acids + Caustics = Heat/Spattering	Aluminum Powder + Ammonium Nitrate = Explosion
Caustics + Epoxies = Extreme Heats	Sodium Cyanide + Sulfuric Acid = Lethal Hydrogen Cyanide
Chlorine Gas + Acetylene = Explosion	Ammonia + Bleach = Noxious Fumes

D-2. General Compatibility Rules.

- a. **Reactives** must be segregated from **Ignitables**.
- b. **Acids** must be segregated from **Caustics**.
- c. **Corrosives** should be segregated from **Flammables**.
- d. **Oxidizers** should be segregated from **EVERYTHING**.
- e. **Many Corrosives** are “Water Reactive”.
- f. Most **Organic Reactives** must be segregated from **Inorganic Reactives** (metals).

Ignitables (Flammables/Combustibles)	Corrosives	
	Acids	Caustics
Carburetor Cleaners Engine Cleaners Epoxy, Resins, Adhesives, and Rubber Cements Finishes Fuels Lacquers Paints Paint Thinners Paint Wastes Pesticides that contain Solvents (such as Methyl Alcohol, Ethyl Alcohol, Isopropyl Alcohol, Toluene, Xylene). Petroleum Solvents (Dry-cleaning Fluid) Solvents: Acetone Benzene Carbon Tetrachloride (Carbon Tet) Ethanol (Ethyl Alcohol) Ethyl Benzene Isopropanol (Isopropyl Alcohol) Kerosene (Fuel Oil #1) Methanol (Wood Alcohol) Methyl Ethyl Ketone (MEK) Petroleum Distillates Tetrahydrofuran (THF) Toluene (Methacide, Methylbenzene, Methylbenzol, Phenylmethane, Toluol, Antisal IA) White Spirits (White Spirits, Mineral Spirits, Naptha) Xylene (Xylol) Stains Stripping Agents Varsol Waste Fuels Waste Ink Wax Removers Wood Cleaners	Battery Acids Degreasers and Engine Cleaners Etching Fluids Hydrobromic Acid Hydrochloric Acid (Muriatic Acid) Nitric Acid (<40%) (Aquafortis) Phosphoric Acid Rust Removers Sulfuric Acid (Oil of Vitriol)	Acetylene Sludge Alkaline Battery Acids Alkaline Cleaners Alkaline Degreasers Alkaline Etching Fluids Lime and Water Lime Wastewater Potassium Hydroxide (Caustic Potash) Rust Removers Sodium Hydroxide (Caustic Soda, Soda Lye)
	Reactive Metals	Reactive Organic Compounds and Solutions
		Lithium (Batteries) Aluminum Beryllium Calcium Magnesium Sodium Zinc Powder
	Oxidizers	
	Chlorine Gas Nitric Acid (>40%), aka Red Fuming Nitric Nitrates (Sodium Nitrate, Ammonium Nitrate) Perchlorates Perchloric Acid Peroxides Calcium Hypochlorite (>60%)	

Source: Environmental Compliance Assessment System (ECAS) Users Guide Series, Compliance in the Field, Appendix 4.

APPENDIX E. DEVENS RESERVE FORCES TRAINING AREA SPILL QUICK REFERENCE

ONLY THE INCIDENT ON-SCENE COORDINATOR OR DPW ENVIRONMENTAL DIVISION WILL MAKE EXTERNAL NOTIFICATIONS OF SPILLS/RELEASES.

POINTS OF CONTACT	TELEPHONE NUMBERS
Incident On-Scene Coordinator (IOSC) – DPW Maintenance Branch Chief	978-796-3778 978-580-0061
Range Control	978-796-2723 978-796-2155
DoD Police	978-796-3333 978-796-3221
Ambulance/Fire Department	9-911
DPW Environmental Division	978-796-3078 978-796-2747 978-796-3665
Safety Office	978-796-2159 978-796-2441 978-360-2553 978-796-2534 (Range Control)
DPW Director	978-796-3665 978-857-2698

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.
- Contact the Incident On-Scene Coordinator (IOSC) ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- The IOSC will verify if responsible party or contractor should cleanup the spill/release.
- Contact the DPW Environmental Division. If no answer, contact Safety Office.
- DPW Director shall be contacted **only** for information purpose or if the DPW Environmental Division or the Safety Office cannot be reached.

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES AT SOUTH POST

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.
- Contact Range Control ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- Range Control will contact the Incident On-Scene Coordinator (IOSC) to notify of the spill and verify if responsible party or contractor should cleanup the spill/release.
- IOSC will contact the DPW Environmental Division. If no answer, contact Safety Office.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES DURING OFF-DUTY HOURS

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.
- If spill/release is located at South Post, follow above steps.
- Otherwise, contact the DoD Police ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- The DoD Police will contact the Incident On-Scene Coordinator (IOSC) and DPW Environmental Division.
- The IOSC will verify if responsible party or contractor should cleanup the spill/release.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.

MEDICAL EMERGENCIES

- If there is an injury or medical emergency, call for an ambulance.
- If emergency is located at South Post, contact Range Control ASAP.
- Otherwise, contact the DoD Police ASAP.
- If environmental-related, contact the Incident On-Scene Coordinator and the DPW Environmental Division.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.

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