

Environmental Management Plan

ENVIRONMENTAL MANAGEMENT PLAN

1.0 PURPOSE

This Plan defines the procedures that must be followed in order to ensure the company's compliance with all applicable environmental management statutes, rules, and regulations with regard to general environmental management compliance, hazard communications (HAZCOM), hazardous material (HAZMAT) and hazardous waste (HW) issues, and HW spill prevention and response. This Plan incorporates the environmental management requirements set forth throughout the Statement of Work (SOW). This Plan addresses the company's responsibilities with respect to:

- General environmental management compliance.

- HAZCOM program and training.

- HAZMAT program and training.

- HW program and training.

- Self-evaluation through the company's Quality Control (QC) Program, which is designed and implemented to ensure compliance with all federal, state, local, and Department of Defense (DoD) environmental management rules and regulations.

2.0 ENVIRONMENTAL MANAGEMENT COMPLIANCE

2.1 General Environmental Management Compliance

The company is responsible for being knowledgeable in, and complying with, all applicable federal, state, and local and DoD rules and regulations covering environmental management, protection, pollution control, and abatement, including but not limited to the Resource Conservation and Recovery Act (RCRA), the Clean Air Act, the Clean Water Act, the Comprehensive Environmental Response, the Compensation, and Liability Act, the Toxic Substance Control Act, the Federal Insecticide, Fungicide, and Rodenticide Act, the Endangered Species Act, the National Historic Preservation Act, the National Environmental Policy Act, the Emergency Planning Community Right-to-Know Act and all other federal environmental rules and regulations and any state or local equivalents or additional requirements. In the event environmental rules and/or regulations change during the term of the contract, that the company will comply as such laws come into effect.

In the event that federal, state, local or DoD laws, regulations, standards, or instructions appear to conflict with local operating procedures, the company will request assistance from the government for interpretation and resolution. Additionally, the company will comply with the specific environmental management requirements of this Plan by implementing Standard Operating Procedures (SOPs), and measuring compliance against these standards.

2.2 Solid Waste Management Compliance

In accordance with Section 4.7.6 of the SOW, the company and its subcontractors shall participate in the base recycling and city composting programs and use pollution prevention and source reduction concepts to reduce and eliminate waste. The company and its subcontractors shall place all waste that cannot be recycled or composted into the appropriate containers. The company and its subcontractors shall not dispose of hazardous material, flammable liquids, petroleum products, yard waste, vegetation cuttings, rocks, dirt, concrete, or construction debris in base dumpsters and or containers.

2.3 Air Quality Management Compliance

The company is required to comply with 20.11.20 NMAC, Fugitive Dust Control, regulations with regard to routine maintenance and construction occurring in the facility when the area of disturbance is three-quarters of an acre or more. MSG/CEANC shall be contacted for all instances where the disturbed area reaches or exceeds three-quarters of an acre. The company is also required to comply with 20.11.20.22 NMAC when demolishing any building containing over 75,000 cubic feet of space. MSG/CEANC shall be contacted for all instances when building demolitions reach or exceed this threshold.

2.4 Ozone Depleting Substances (ODSs)

The company has developed a separate Refrigerant Management Program Improvement Plan and will follow this plan when performing required recordkeeping activities, training and certifying technicians, and working with equipment containing ODSs to comply with all Environmental Protection Administration (EPA) regulations.

2.5 Asbestos and Lead Based Paint

In accordance with Section 1.22.24 of the SOW, the company shall remove, and dispose of Asbestos Containing Material (ACM) and Lead Based Paint (LBP) on pipes, equipment, buildings, and facilities in accordance with (IAW) federal, state, and local environmental protection, occupational safety and health regulations, directives, and 32-1052. Comply with the current Asbestos Operations Plan and the current Lead Based Paint Management Plan.

The company shall submit written requests to Natural Resources Management Branch (MSG/CEAN) Compliance Section to provide inventories on known ACM or LBP prior to design of maintenance, repair, minor construction, or MILCON construction on existing facilities. Natural Resources Management Branch (MSG/CEAN) Compliance Section will provide the contractor with specific guidance on necessary removal, and disposal procedures as part of the survey results. The contractor will provide a copy of the amount and location of asbestos or LBP. Natural Resources Management Branch (MSG/CEAN) and the Bio Environmental Engineer will review design drawings and specifications and determine that they meet the regulatory environmental and OSHA standards. The company will ensure that it is encapsulated

or abated as appropriate, by licensed abatement professionals, in accordance with all applicable regulations.

2.6 Water Program

The facility operates under several National Pollutant Discharge Elimination System (NPDES) permits that include the following: Multi-Sector General Permit (MSGP), a Municipal Separate Storm Sewer System (MS4) permit, and a Construction General Permit (CGP). The MSGP section that is applicable to the company is the prohibiting of illicit non-storm water discharges, i.e., vehicle and equipment washing must be done in designated areas such as a wash rack. The MS4 covers storm water that directly discharges to the river. The company is responsible for ensuring that company personnel are not disposing of waste into the MS4 system. The CGP covers most construction projects disturbing one acre or more. If the company executes a project that disturbs an area equal to or greater than one acre, the CGP may apply. MSG/CEANC shall be contacted for all instances where the disturbed area exceeds one acre. The Construction General Permits contain stringent management plans that must be followed in order to maintain compliance with the applicable permit language.

The facility operates under a pretreatment permit issued by the city, which requires that specific pretreatment standards be met prior to discharge to the sanitary sewer. Oil-water separators are a crucial component of this effort and they must be cleaned and sampled periodically to avoid unauthorized discharges to the sanitary sewer. Documentation of clean-out records and analytical data of the units sampled are permit requirements. Cleaning the oil-water separators is currently the company's responsibility.

3.0 ENVIRONMENTAL & OCCUPATIONAL HEALTH COMPLIANCE ASSESSMENT AND MANAGEMENT PROGRAM

The company is responsible for supporting and participating in the Environmental protocols for all of the facility's Environmental & Occupational Health Compliance Assessment and Management Program (EOHCAMP) inspections. The company will support the EOHCAMP process, including preparing areas for inspection, providing personnel for EOHCAMP interviews, and assisting and providing access to documents and records for environmental management activities. The company will respond to EOHCAMP discrepancies and findings as required.

4.0 HAZCOM PROGRAM AND TRAINING

4.1 Introduction

This section outlines the company's approach to HAZMAT use and storage and HAZCOM.

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The company is responsible for developing and maintaining a HAZCOM Program to protect its employees' health and safety. The HAZCOM Program will be designed to:

- Make available information regarding HAZMATs to employees.
- Raise awareness of employees of the HAZMAT stored and used in the various work areas.
- Provide training to employees regarding procedures and practices to control exposure to these chemicals.

The regulatory requirements for the HAZCOM Program are set forth in the HAZCOM promulgated by the Occupational Safety and Health Administration's General Industry Safety Standards, 29 Code of Federal Regulations (CFR) 1910.1200. The state's are found in Sections 50-9-1 through 50-9-25, 1978, and may be cited as the state's Occupational Health and Safety Act.

The following sections describe the elements of the company's HAZCOM Program. The HAZCOM Program elements include responsibilities of personnel, procedures for requisitioning and managing HAZMAT, and the processes for identifying and procuring materials that are regulated by federal and DoD instructions.

4.2 Responsibilities

The following subsections detail the company personnel's HAZMAT management responsibilities for activities associated with base operations.

4.2.1 Safety Manager

The Safety Manager is responsible for:

- Performing and maintaining workplace safety surveys to identify physical hazards.
- Training supervisors to recognize physical hazards in the workplace.
- Performing inspections to ensure compliance with the HAZCOM Program.
- Maintaining documentation of all training provided under the HAZCOM Program.

4.2.2 Unit Environmental Management Coordinator (UEC)

The UEC is responsible for:

- Providing all personnel with HAZCOM training.
- Ensuring that the company follows and adheres to policies and procedures developed by the HAZMAT Materials Management Process Team (HMMPT) as detailed in the most current Instruction 32-7086, *Hazardous Material Management*, and most current Hazardous Materials Emergency Planning and Response Plan (Spill Plan), and applicable company SOPs.
- Attending HMMPT meetings as requested or required.

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Disseminating information provided by the HMMPT or other sources pertaining to HAZMAT management and control.

Acting as the company's point-of-contact for direction relative to Form 3952, Chemical/Hazardous Material Request Authorization, and the company's HAZMAT Authorized User List (AUL).

Ensuring receipt of Form 3952s from Shop Supervisors and reviewing, approving, and submitting all Form 3952s to the Hazardous Material Cell (HMC) for processing and authorization.

Implementing all applicable provisions of HAZMAT management policies and directives and, in conjunction with appropriate facility support organizations, directing and ensuring compliance with federal, state, local and DoD laws and regulations at the company's organizational level.

Performing QC HAZMAT compliance inspections and reporting findings through the company's QC Program.

4.2.3 Shop Supervisors

Shop Supervisors are responsible for:

Applying for authorization for each valid HAZMAT using Form 3952, Chemical/Hazardous Material Request Authorization.

Ensuring that only the amounts of HAZMAT required by any specific process or application are requisitioned.

Ensuring that all containers in their areas, including secondary containers and day tanks, are appropriately labeled IAW 29 CFR 1910.1200.

Ensuring that Material Safety Data sheets (MSDSs) and Physical Agent Data Sheets are available in work areas for employee review.

Training employees whenever a new HAZMAT or physical hazard is introduced into work areas under their supervision.

Training employees on hazards that may be present during performance of non-routine tasks.

Training employees working on unlabeled pipes for potential encounters with asbestos.

Maintaining an inventory of materials in their work areas.

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4.2.4 Buyers

Buyers are responsible for ensuring that only authorized HAZMAT is requisitioned by confirming that an 3952 has been processed and authorized by the HMC through the HAZMAT Management System (HMMS) database.

4.2.5 Warehouse Section

Warehouse personnel are responsible for:

- Ensuring that only authorized HAZMAT is issued.

- Ensuring that appropriate personnel are authorized to receive HAZMAT for their workplace.

- Ensuring that each HAZMAT is affixed with an HMMS-generated pharmacy label.

4.2.6 Shop Personnel

Shop Personnel are responsible for:

- Ensuring that, when transferring materials from original containers to secondary containers, containers are marked IAW 29 CFR 1910.1200.

- Using information and training received to protect themselves and their fellow workers against undue exposure to hazardous chemicals.

- Reporting any suspected unsafe condition in the workplace to their supervisor, the UEC, or the Safety Manager.

4.3 Inventory of HAZMATs

A complete inventory of all HAZMATs on site is a central focus of the HAZCOM Program. A HAZMAT is defined as any item or class of items referenced in Federal Standard 313D, paragraph 3.2. The HAZMAT that company personnel purchase, store, or use in the workplace is documented in the inventory.

The inventory is revised during the year when a new HAZMAT, and its associated MSDS, is brought on site for use or when a HAZMAT ceases to be used or stored. A current inventory list will be maintained for each storage cabinet and bulk storage area where any HAZMAT or petroleum, oils, or lubricants (POLs) are stored. These lists will be updated periodically and posted on the cabinet/storage area door.

4.4 Container Labeling

It is company policy that no primary container of HAZMAT will be used on-site unless it has a single, legible label, printed in English (most likely an HMC yellow pharmacy label), with at least the following information:

- Name of chemical.

- Type of hazard present.

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Name and address of manufacturer or supplier.

Primary containers that have missing or incomplete labels will be labeled with the above information. The labels will be obtained from the manufacturer, a commercial vendor of “Right-to-Know” information systems, or made by the company in a legible fashion.

To further ensure that employees are aware of the HAZMAT used in their work areas, company policy is to label all secondary containers and day tanks. When the contents of an original container are transferred to an in-plant container (e.g., to safety cans or squirt bottles), the employee performing the transfer will be responsible for properly labeling the secondary container to identify the HAZMAT being transferred. Appropriate hazard warnings will be included as part of these labels. Supervisors and managers will ensure that all secondary containers are labeled with either a copy of the original manufacturer’s label, a generic label that has fill-in-blocks for the identity and hazard warnings, or preprinted labels.

4.5 MSDSs

MSDSs are the basic means of communicating technical information about possible physical and health hazards associated with HAZMAT. MSDSs are required for all HAZMAT prior to company requisition, issue, storage, and use at the facility.

The company’s Operations Warehouse Section will maintain a site master file of MSDSs for materials issued at the site. In addition to the site master file, supervisors at the various work areas will be responsible for maintaining sub-files of MSDSs for materials used in their work areas. The MSDSs will be kept in an accessible area in the various work areas or shops. Employees will have complete access to these MSDSs during their work shift. **Note: If an employee discovers that a current MSDS is not available, he or she will request a copy of the MSDS from the UEC or Safety Manager.**

4.6 HAZMAT Authorization Process

4.6.1 Form 3952

Form 3952 establishes a standardized procedure for requesting and authorizing HAZMAT. HMMPT is responsible for reviewing submitted Form 3952s for various considerations. No HAZMAT will be brought onto the installation or used until HMC approval has been obtained.

4.6.2 Authorization Procedures

The company operating as DoD Source of Supply and issuing HAZMAT will comply with HMMPT requirements.

The company will use Form 3952 to initiate a request for HAZMAT through the MSG/CEANC. This form will be used for a first time use of the HAZMAT in a work area process, a change of work area process, an increase in draw amount or draw frequency, and non-recurring processes.

MSG/CEAN, BW/SEG and MDS/SGPB will review HAZMAT authorization requests to evaluate if a suitable material substitution is feasible and appropriate risk control measures are in place.

The HMC will ensure that entry of company-supplied information into the HMMS database. This action will set up the company's AULs.

Once all existing company AULs have been validated and/or new authorization requests have been submitted (i.e., Form 3952), the HMC will finalize/approve the company's AULs using HMMS.

4.7 HAZMAT Storage and Use

The company is responsible for following manufacturer's guidelines and professional recommendations for control of humidity, temperature, cleanliness, and materials handling. The company will ensure that policies and procedures are established that protect the health and the safety of all employees and the community to minimize or eliminate the risk of environmental pollution.

4.8 Employee Information and Training

All new employees are required to attend HAZCOM orientation training prior to starting work. The training will consist of the following:

- An overview of the requirements contained in the HAZCOM rules.

- Review of the HAZMATs and physical agents present or potentially influencing the workplace.

- Location and availability of the company's written HAZCOM Plan and Program.

- General health and safety procedures.

- Physical and health effects of the HAZMATs and physical agents at the site.

- Methods used to determine the presence or release of HAZMATs and physical agents in the work area.

- How to prevent exposure to these HAZMATs and physical agents through work practices, engineering controls, and Personal Protective Equipment (PPE).

- Emergency procedures to follow if employees are exposed to HAZMAT hazards or physical agents.

- How to respond to incidental spills, including leak and spill cleanup procedures, and the use of appropriate Personal Protective Equipment (PPE).

- How to interpret HAZMAT labels and review MSDSs in order to obtain appropriate hazard information.

Periodic training will be provided to appropriate employees whenever a new HAZMAT is introduced into their work area(s), as indicated by the Shop Supervisor's submission of a Form 3952, and whenever new, significant information is received about HAZMAT already in their work area(s). The UEC is responsible for coordinating this training.

4.9 Inspections

Periodic inspections will occur at all company HAZMAT AUL zones using an internally developed inspection checklist, which will be derived from EOHCAMP HAZMAT DoD protocols and findings reported in the QC program. A copy of the checklist may be obtained from the company's Environmental Section in Building 20683.

5.0 HW PROGRAM AND TRAINING

5.1 Introduction

This section outlines the company's approach to the proper management of HW to ensure compliance with all applicable regulations and directives. HW is defined as any material that is subject to Environmental Protection Agency's HW manifest requirements, as specified in 40 CFR 262, and that meets the definition in 40 CFR Part 261.3.

5.2 HW Management Responsibilities

Company employees shall conform to DoD management practices of all HW-generated IAW the most current HW Management Plan (HWMP). The HWMP specifies HW responsibilities for each unit's UEC, UEC Supervisor, Initial Accumulation Point (IAP) Manager (IAPM), Primary/Alternate IAPMs, and IAPM Supervisors. Therefore, the company has aligned its organizational structure to ensure that these responsibilities are appropriately accounted for.

5.2.1 Company Project Manager

The company Project Manager will appoint, in writing, one UEC as the focal point or chief liaison for HW management and disposal compliance for the contract. Additionally, the company Project Manager will:

- Ensure that the UEC is able to accurately report to the MSG/CE on the company's HW compliance status and processes and that the HWMP has been implemented throughout the company's areas of responsibility.

- Ensure that the UEC has the authority to report directly to the company's Project Manager and coordinate with MSG/CEANC on all matters of HW management IAW the company's SOW.

- Ensure that HW responsibilities are included in the UEC's job description and individual training and performance plan, as a primary duty.

- Ensure that the UEC has the proper training and authority to perform his/her HW duties, as assigned, IAW the HWMP.

- Ensure that all company personnel who work with HW and their supervisors receive and successfully complete HW training before working with HW, as well as an annual HW refresher course.

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5.2.3 UEC

The company's United Environmental Management Coordinator (UEC) is responsible for:

Operating as the company's focal point or chief liaison for HW management and disposal compliance.

Coordinating with MSG/CEANC in establishing and closing new IAPs.

Coordinating with company supervisors in appointing IAPMs, and forwarding copies of the appointment letters to MSG/CEANC.

Ensuring that all applicable supervisors and shop personnel obtain training as outlined in the HWMP.

Overseeing operational management of the company's IAPs IAW the HWMP.

Performing quarterly inspections of the company IAPs using an internally developed checklist based upon the DoD Environmental Compliance Assessment and Management Program (ECAMP) protocols for HW and HAZMAT, entering inspection results into the company's QC database, and forwarding all findings and corrective actions to the IAPM's supervisor, the the company Project Manager, and MSG/CE Quality Assurance Branch (MSG/CEYQ) Evaluators. A copy of the checklist may be obtained from the company's Environmental Section.

Ensuring that the company's HW inventory is accurate and immediately reporting changes to MSG/CEANC.

Identifying new or modified company waste streams.

Overseeing maintenance and acquisition of the company's site contingency materials and equipment.

Overseeing the preparation of the site-specific spill contingency plan for each of the company's IAPs.

Requesting sampling and chemical analysis of unknown waste to expedite disposal.

Overseeing the processing of HW turn-in documents.

Reporting deficiencies or needs of the company's IAPs to MSG/CEANC.

Coordinating with MSG/CEANC to correct deficiencies and meet the needs of the company's IAPs.

Disseminating HW information and direction to the company's sections.

Answering IAPM questions concerning HW management.

Coordinating all activities involving environmental issues with the MSG/CEANC.

5.2.4 Supervisors of IAPMs

The Supervisors of IAPMs will:

Ensure that the company's Project Manager, with guidance from the company's UEC, appoints in writing, a primary and alternate IAPM to manage and control the waste generated by the company.

Ensure that HW management activities are conducted IAW the HWMP.

Document each process that generates waste and report all regulated and non-regulated waste streams to the company's UEC. In addition, the Supervisors will notify the company's UEC in the event of the following:

- ❖ New or different products that alter the characteristics of the waste are introduced.
- ❖ New equipment that alters the characteristics of the waste are introduced.
- ❖ A new process that will generate a new waste stream is introduced.
- ❖ Anything that changes the characteristics of waste that has already been identified, documented, and laboratory analyzed.

Ensure that HW responsibilities are included in the IAPM's job description as required or appropriate.

Inspect IAP on a weekly basis, record any deficiencies on the Weekly Accumulation Checklist, report deficiencies to the company's UEC, and take action to correct any deficiencies. Checklists will be maintained at the IAP for one year.

Have the ability to perform all of the IAPM duties.

5.2.5 Primary and Alternate IAPMs

The company's primary and alternative IAPMs are responsible for:

An IAP notebook, which will be maintained daily. Contents of the notebook will consist of the information listed below, at minimum, per the HWMP:

- ❖ Current Environmental Management HWMP.
- ❖ Current Spill Plan.
- ❖ Current listing of personnel assigned to the company's functions and a general description of the type of work done in the section.
- ❖ Current letter appointing the primary/alternate IAPM.
- ❖ Current HW Training Certificates.
- ❖ Current waste stream inventory.
- ❖ Weekly Accumulation Checklist (on file for one year at the IAP).
- ❖ Post-Container Checklists.
- ❖ Waste Segregation Log Sheets.
- ❖ DoD Form 1348-1, Issue/Receipt Documents (on file for one year at IAP).
- ❖ Site-Specific Contingency Plan with floor plan of building.

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- ❖ Sample results of waste stream(s) (on file indefinitely).
- ❖ Position description of IAPM or any other forms of documentation.

Verifying that each IAP has a sign/placard (provided by MSG/CEANC) placed near the IAP clearly delineating its location.

Segregating and collecting used POL, surplus HAZMAT, and HW according to the requirements of the HWMP, federal, state, local, and DoD regulations.

Obtaining Department of Transportation (DOT) and United Nations-approved containers to segregate and hold waste during collection.

Preparing and submitting all required turn-in documentation to MSG/CEANC for processing. The following documents are required:

- ❖ Form 2005, Issue/Turn-In Request, in two copies.
- ❖ Defense Reutilization and Marketing Service (DRMS) Form 1930, HW Profile Sheet.
- ❖ MSDS or laboratory analysis.
- ❖ Post-container checklist.
- ❖ Waste segregation log sheet.

Inspecting IAPs on a weekly basis, recording any deficiencies on the weekly accumulation checklist, reporting the deficiencies to IAPM's supervisor, and taking action to correct any deficiencies.

Marking all collection containers IAW the HWMP.

Maintaining the contents of each container, including the characteristics of each increment of waste if the container was not filled all at once, and annotating increments added on a Waste Segregation Log Sheet.

Preventing unacceptable disposal practices, such as dumping POLs, HAZMAT, and HW into sewers, storm drains, waters, dumpsters, or landfill.

Coordinating all work operations that may involve the use, generation, or disposal of any material that may be considered hazardous or questionably hazardous.

5.3 IAPs

An IAP is a designated location where HW from a specific process is initially accumulated in a container at or near the point of generation. Regulations pertaining to the management of an IAP are found at 40 CFR 262.34. The company's UEC will coordinate the site of an IAP with MSG/CEANC, which will consider proximity to generation point, safety, and compliance with environmental management requirements. An IAP will be under the control of the operator of the process generating the waste. Waste placed in a container will be compatible with the generating process and will not exceed a volume of 55 gallons of HW, or one quart of acute HW. MSG/CEANC will pick up all full containers from the IAP and transfer them to the Defense Reutilization and Marketing Office (DRMO) storage facility. This must be done within 72 hours once DoD Form 1348-1 is processed. Waste in excess of the 55-gallon limit (one quart of acute HW) will not be accumulated at an IAP.

5.3.1 IAP Management

Per the HWMP, HW may be accumulated at an IAP for up to 3 years as long as the amount of waste does not exceed 55 gallons or 1 liter of acute HW and the accumulation container remains in good condition. Federal regulations for IAP management can be found in 40 CFR 262.34(c)(1). The following is a synopsis of IAP management requirements with which the company will comply:

All IAPs will be located at or near the point of waste generation.

Each IAP will have a trained primary or secondary IAPM assigned for each shift responsible for regulatory compliance.

When the container is full (if using a 55-gallon drum for accumulation, leave a 6-inch space for expansion), it will be disposed of IAW the HWMP and all federal, state, local, and DoD requirements.

The container will be labeled IAW the HWMP and all other federal, state, local, and DoD requirements.

The container will be kept closed at all times unless materials are being directly placed in the container.

The container will remain in good condition throughout the period of accumulation. The container will not exhibit any signs of rust, corrosion, dents, or sharp creases. Containers will be compatible with the waste being accumulated.

Containers located in an IAP will be maintained in a manner intended to avoid spills. Controls include securing the container to the wall or within a secondary containment receptacle to avoid tripping over the container and causing a spill. The container will be located in an area near the generating process but not in a place where it is in the path of normal traffic flow through the shop.

Only wastes from the designated generating process will be placed in the container. HW streams will be kept segregated.

Daily visual inspections of the IAP will be conducted by the IAPM or alternate for the shop.

Personnel training records and HW turn-in documents will be maintained in the shop office associated with the IAP.

Spill control equipment will be located at or within direct proximity to the IAP. An adequate inventory of equipment should be maintained at all times.

Personnel who actively use the IAP for disposal of HW must have RCRA HW Management Training.

5.3.2 IAP Inspections

5.3.2.1 *Weekly Inspections*

All company IAPs will be inspected weekly using the Weekly Accumulation Checklist provided in the HWMP. During the inspection, the IAP will be examined for leaking or deteriorating containers. The IAP area will also be inspected for signs of structural deterioration or other problems that might lead to leaks or spills of HW. The primary or alternate IAPM will inspect the HW container(s) daily. The company's Supervisor and IAPM of each IAP will accomplish the end-of-week inspections of their IAP HW containers.

5.3.2.2 *Monthly Inspections*

Each company IAPM will conduct a monthly inspection of their IAP using the Unit Initial Accumulation Point Inspection Checklist provided in the HWMP. Results of the inspection will be entered into the company's QC database, and any noted deficiencies and corrective actions will be forwarded to the IAPM's supervisor. Corrective actions will be forwarded to the company's Project Manager and MSG/CEYQ.

5.3.2.3 *Quarterly Inspections*

The company's UEC will perform quarterly inspections of the company's IAPs using an internally- developed checklist based upon the DoD and Environmental Compliance Assessment and Management Program (ECAMP) protocols for HW and HAZMAT. A copy of the checklist may be obtained from the company's Environmental Section. The UEC will enter the quarterly inspection results into the QC database and forward all findings and corrective actions to the IAPM's supervisor, the company's Project Manager, and CE QAEs.

5.3.3 HW Collection and Turn-In Procedures

The company shall ensure proper collection and turn-in of the company-generated hazardous and non-HW and materials.

Turn-in procedures will be conducted IAW with the HWMP and all current federal, state, and local environmental management rules and regulations.

Required turn-in documentation shall be prepared and submitted to MSG/CEANC for processing. The following turn-in documents will be submitted:

- ❖ Form 2005, Issue/Turn-In Request, in two copies.
- ❖ DRMS Form 1930, HW Profile Sheet.
- ❖ MSDS or laboratory analysis.
- ❖ Post-container checklist.
- ❖ Waste segregation log sheet.

All company-generated HW will be transported by MSG/CEANC to Defense Reutilization and Marketing Office (DRMO) for processing, manifesting, and disposal.

5.3.4 Transportation Requirements

It is important to ensure that any waste transported into the facility is done in a manner that will not endanger human health or the environment. The company's IAPM will ensure that HW is accumulated and transported in proper DOT-specific containers. The IAPM or alternate will also ensure that containers are in good condition. Prior to turning in HW, each container will be inspected by the IAPM and fill out the Post Container Check list to verify that the container is in good condition and suitable for transportation. The company does not conduct any off-base transportation. All off-base transportation is conducted by a contractor not affiliated with the company.

5.4 HW Training

All personnel who work with HW (e.g., UEC, UEC Supervisor, IAPMs, IAPM's Supervisor) will receive initial HW management training and annual updates as required by 40 CFR 262.34. Training will be documented by certificate or sign-in sheet containing the student name and signature, name and signature of the instructor, and the date that training occurred.

5.4.1 Training Responsibilities

Currently, company personnel who perform HW duties attend on-base HW training offered at any time. This training is required prior to personnel working in unsupervised HW roles. MSG/CEANC provides all unit UECs with electronic HW training tools to be used for both initial and refresher HW training.

5.4.2 Scope of Mandatory Training Requirements

There are two general components to the training required by RCRA in 40 CFR 265.16. Personnel must be trained to:

- Perform their duties in a way that ensures the facility's compliance with the regulations.

- Respond to emergencies involving HW.

HW training, whether provided by MSG/CEANC or the company's UEC, will cover at a minimum the following subjects, in addition to the most current federal and state requirements:

- Introduction to RCRA.

- Identification of HW.

- IAP Management.

- Container Use, Marking and Labeling, and On-base Transportation.

- Waste Turn-in Procedures.

- Manifesting and Transporting HW.

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Spill Prevention and Response to Emergencies.
Personnel Safety and Health and Fire Safety.
Universal Waste

To fully comply with the regulations, the course will be tailored to meet each IAP's specific requirements. If an IAP has unique procedures for waste determination, accumulation, transportation, and turn-in, each will be incorporated into the program. Moreover, the IAPs' specific emergency response procedures will be incorporated into the program.

5.4.3 HW Training Documentation

Proper documentation of all HW training is required. To meet this requirement, the company will ensure that all training is documented for each individual that successfully completes the program. This documentation will include as a minimum, the student's name, job title, job description, previous training related to HW and/or HAZMAT, date training was received, instructor, and projected date of required annual refresher course. Training records on current personnel will be permanently maintained.

6.0 SPILL PREVENTION AND RESPONSE, TRAINING, AND SITE-SPECIFIC CONTINGENCY PLANS

6.1 Preparedness and Spill Prevention Techniques

Spill preparedness and prevention procedures and methods will be developed and implemented at all IAPs for HW and HAZMAT IAW the HWMP and 40 CFR 262.34(a)(4) and 265.50 through 265.54. The spill prevention procedures and methods that will be practiced at the company's IAPs are briefly discussed below.

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6.1.1 Secondary Containment

Secondary containment is the physical containment or capture of a spill, thus preventing or limiting its release to the environment. Examples of secondary containment that will be employed include dikes, curbs, oil/water separators, drip pans, and collection systems.

6.1.2 Visual Inspections

Visual inspections will consist of touring or patrolling a potential spill site to detect spills, evidence of spills, or conditions that could result in a spill. These include routine inspections performed by IAPMs and detailed inspections performed by the UEC. Further, a spill plan site inspection form will be completed by each IAPM annually and submitted to MSG/CEANC IAW Spill Plan.

6.1.3 Preventive Maintenance

Preventive maintenance as a part of the spill prevention program will involve periodically lubricating, adjusting, and replacing worn parts in all equipment where equipment failure could result in a spill of oils or hazardous substances or impede emergency response efforts.

6.1.4 Housekeeping

Good housekeeping will involve maintaining a clean, orderly work environment, thereby reducing the possibility of accidental spills caused by mishandling of equipment and materials and facilitating the detection of spills and leaks.

6.1.5 Security

Security will involve the deterrence of unauthorized, unknowing, or accidental entry of personnel, animals, or vehicles into potential spill areas, when such entry could result in the damage or misuse of equipment containing or conveying oils or hazardous substances.

6.1.6 Monitoring

Monitoring prevents oil and hazardous substance spills by observing operational conditions that could indicate or result in a spill, as well as facilitating early detection of spills by monitoring environmental conditions.

6.2 Spill Response

Procedures and responsibilities for responding to a HW spill/incident are in the Spill Prevention Control and Countermeasure Plan and the Spill Plan, and will be incorporated into each shop's site-specific spill plan. Upon discovering a spill, personnel will take immediate action to protect human health and the environment. The facility has a Spill Response Team especially trained to handle hazardous materials spills. If a hazardous materials spill occurs that is posing imminent danger to the health of personnel or the

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environment, or which is greater than 2 feet in diameter, call 911 immediately. Upon assessment of the severity of the spill, the procedures of the facility's Spill Plan and the shop's contingency plan will be implemented.

All spills smaller than 2 feet in diameter that do not cause a threat to life or health, and/or contamination to the environment will be contained and cleaned up by the generating unit. Contact the UEC who will contact MSG/CEANC to acquire the proper container that is compatible with the waste that was generated by the spill. Spilled materials will be placed in properly marked containers and turned in as HW for appropriate disposal.

All spills involving flammable materials (materials with a flash point of 140 F and below, e.g., JP-8, motor gasoline, diesel, etc.) and HW and/or HAZMAT, regardless of size, will be reported by the spill/generating shop to the facility's fire department and MSG/CEANC as soon as the spill is discovered for regulatory reporting purposes and assistance.

The following small spill response methods will be employed at each company shop:

Contact the UEC immediately to inform them of the spill. UEC will contact MSG/CEANC, notifying them of the spill and to request a compatible container for the disposal of the waste that will be generated from the spill clean-up.

Stop the spill at its source, ONLY if it is safe to do so. For example, a drum with a hole on one side could be rolled over and braced so that the hole is above the liquid level, or leaking processing equipment could be shut down and valves, pipes, and hoses could be closed or shut down. Always wear personal protective equipment when responding to spills.

Keep the spill scene off-limits to unauthorized personnel.

Evacuate the endangered area, if necessary.

Shut off the power to mechanical equipment that may provide an ignition source for a fire or explosion.

Use absorbents to clean up the spill. A dike should be formed around the edges of the spill, preventing the spilled material from escaping to an unconfined area, drains, or an area where hot equipment could ignite the spilled material.

Once the spill has been absorbed, pick up the material with brooms and shovels that do not conduct or produce static electricity. Place it in the compatible container delivered by the facility's Spill Response Team, which will be properly labeled as HW. Used personal protective gear, in some cases, should also be managed as HW.

Complete the Spill Response Form, Appendix A of the Spill Plan, and submit to the company's UEC, who will then submit the original to MSG/CEANC. A copy will be permanently maintained by the UEC.

6.3 Emergency Response Equipment

Each shop will be evaluated to determine the type of emergency equipment necessary to abate emergencies that may reasonably be anticipated to occur at that location. Emergency equipment could include, but will not be limited to, fire extinguishing systems, spill control equipment, internal and external communications and alarm systems, and decontamination equipment. Additional equipment should include at a minimum the following emergency response and fire-fighting equipment: absorbent material, face shield or goggles, chemical resistant apron, one stand-by, open-top 55-gallon overpack drum, eyewash station/emergency shower, and First Aid Kit. All emergency response equipment should be near enough to the HW and/or HAZMAT area to make it convenient and easy to get in the event of an emergency, but not so close that it cannot be approached or could be damaged in the event of a spill or fire.

6.4 Spill Prevention and Response Training

Spill Prevention and Response Training will be incorporated into both the HAZCOM and HW training programs to help implement spill prevention, control, reporting, and response procedures to ensure that the company develops an annual shop-specific training program that will address not only spill prevention and response, but also transporting HW and HAZMAT between buildings and the IAP and the Treatment, Storage, Disposal facility. Spill Prevention and Response Training will help to implement spill prevention, control, reporting, and response procedures to ensure that:

The occurrence of spills is minimized.

If a spill should occur, it will be prevented from entering the environment.

If a spill should occur and enter the environment, it will be contained and cleaned up so as to minimize the effects on personnel, local residents, and the environment.

6.4.1 Spill Prevention, Controls and Countermeasures Plan

The facility is subject to the requirements of the Spill Prevention, Control, and Countermeasures (SPCC) requirements under 40 CFR 112 for all storage of Petroleum, Oil, and Lubricants in quantities of 55 gallons or more. The company is required to implement the storage tank inspection and maintenance requirements as specified in the SPCC Plan.

7.0 SELF-EVALUATION PROGRAM

As discussed throughout this Plan, the company will self-evaluate through its QC Program, which is designed and implemented to ensure compliance with all federal, state, local and DoD environmental management rules and regulations.