Hazardous Substance Management Plan (HSMP)

Formerly the Hazardous Material and Waste Management (HMWM) Plan

U.S. Army Garrison
Fort Jackson

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1. PURPOSE

a. The purpose of the HSMP is to assist Fort Jackson (FJ) organizations in complying with environmental regulations pertaining to hazardous substances (HS). Violators can be held personally liable for clean up costs and civil/criminal penalties. Liability can include supervisors and commanders who allow violations to occur and do not take immediate action to prevent or correct the violation. Ignorance of the law is not an acceptable defense.

b. The plan satisfies hazardous waste (HW) minimization requirements by documenting the actions being taken to reduce the quantity and toxicity of HS used and generated on FJ.

c. The plan establishes compliance with the regulations listed in paragraph 7.

2. APPLICABILITY.

a. All organizations, including tenant activities, which manage HS on FJ and do not have their own U.S. Environmental Protection Agency (EPA) Identification (ID) Number, must comply with this plan. Contractors must comply with environmental regulations and contract specifications.

b. Organizations that have their own EPA ID number are not included in this plan. These include the South Carolina Army National Guard (SCARNG); the U.S. Marines, a tenant activity of the SCARNG; the automated fueling facility, operated and owned by Southern Terminal Services, LLC; the laundry facility, operated and owned by Crown Contract Services; and the housing area, operated and owned by Balfour Beatty, Inc.

3. SCOPE

a. Management of asbestos containing materials and polychlorinated biphenyls (PCBs) are not included in this plan, please refer to the Asbestos Hazard Management Plan and the PCB Management Plan. This plan also does not cover management of munitions and explosives.

4. DEFINITIONS

a. Hazardous substance (HS): Any substance (material or waste) that poses a threat to human health or the environment when improperly treated, stored, transported, or otherwise managed.

b. Hazardous material (HM): A usable HS.

c. Hazardous waste (HW): An unusable HS that meets the regulatory criteria of a listed or characteristic (ignitable, corrosive, toxic, or reactive) HW.

d. Acute HW: A listed HW that has an EPA HW Number beginning with a "P" or the EPA HW Number F020, F021, F022, F023, F026, or F027.

e. Universal waste (UW): A subset of HW. UW includes certain types of batteries, pesticides, mercury-containing equipment, and lamps (i.e. light bulbs).

f. Controlled waste (CW): An unusable HS that does not meet the regulatory definition of HW, but must be managed and/or disposed in accordance with (IAW) South Carolina Department of Health and Environmental Control (DHEC) regulations.

g. Safety Data Sheet (SDS) [*formerly called Material Safety Data Sheet (MSDS)*]: A hazard information sheet prepared by the manufacturer, specific to a HM, that identifies the

hazardous ingredients, physical and health hazards, precautions for safe handling and use, and manufacturer information.

h. Reuse Center: The collection point for unwanted paint related materials, usable materials (including HS and office supplies), cell phones, Tyvek envelopes and compact disc holders, and overhead transparencies. The Reuse Center (751-5121) is located in Building 2558, Essayons Way, and is open Monday-Friday from 1000 to 1400.

i. Recycling Center: The collection point for household-type recyclables including cardboard, newspapers, telephone books (January-March only), magazines, high-grade white paper, high-grade mixed paper, glass, steel, aluminum, plastic #1-7 (except Styrofoam), inkjet cartridges, scrap metal, and Xmas trees (during the holiday season only). Pallet recycling can be coordinated by calling the Recycling Center. The Recycling Center (751-4208) is located in Building 5671, Lee Road, and is open Monday-Friday from 0700 to 1500 and Saturday from 0830 to 1530.

j. Hazardous Material Management System (HMMS): A computer database system that tracks the receipt, use, and transfer of HM. The HMMS Office is located inside the Reuse Center.

k. Satellite Accumulation Area (SAA): An area, located near the point of generation, where HW is accumulated. The total volume of HW must not equal or exceed 55 gallons (1 quart of acute HW) for more than 72 hours (3 days).

l. Container Storage Area (CSA): An area where an unlimited volume of HW can be stored, however, the HW must be transported to a permitted facility within 90 days.

m. Empty: A container is considered empty if the contents have been removed using the practices commonly employed to empty that type of container (i.e. pouring, pumping, scraping, etc.). Except for those containers that held an acute HW, empty containers are not HW.

5. RESPONSIBILITIES.

a. All organizations, including tenant activities, must:

(1) Manage their HS IAW this plan.

(2) Appoint an Environmental Compliance Officer (ECO) to oversee compliance with this plan.

(3) Appoint a HS Manager(s), if applicable, to oversee operations that generate HW or CW, or have a high potential for HW generation or HS violations.

b. Contractors that use the FJ EPA ID number or use this plan must:

(1) Manage their HS IAW environmental regulations and contract specifications.

(2) Appoint an ECO to oversee environmental compliance, when stated in their contract, and encouraged to do so when not stated.

(3) Appoint a HS Manager(s), if applicable, to oversee operations that generate HW or CW, or have a high potential for HW generation or HS violations.

(4) Dispose of waste IAW environmental regulations and contract specifications. The FJ HS Program Manager is the only person on FJ with the authority to sign HW manifests, therefore, transport of HW off-post requires prior coordination (751-4231).

c. HS Managers must:

(1) Act as organization HS management point of contact and coordinate with EMB.

(2) Attend the annual HS Management Class provided by EMB.

(3) Provide training and pass on information to other organization personnel, as needed.

(4) Maintain documents IAW this plan.

(5) Accompany the FJ HS Program Manager during scheduled and unannounced inspections.

d. FJ HS Program Manager must:

(1) Act as installation HS management point of contact and coordinate with internal and external agencies as needed.

(2) Submit Quarterly HW Reports, annual Waste Minimization Reports, and annual Emergency Planning and Community Right-to-Know Act Section 312 Reports to DHEC.

(3) Prepare a HW Profile Sheet and DD Form 1348-1 Turn-in Document for each waste being disposed through DLA Disposition Services Jackson and coordinate with them on the waste pickup.

(4) Sign the HW manifest and Land Disposal Restriction Form at the time of pickup.

(5) Inspect HW storage areas at least quarterly.

(6) Attend Resource Conservation and Recovery Act (RCRA) refresher training annually and Department of Transportation (DOT) refresher training biannually.

(7) Provide initial and annual refresher training to all personnel that store and manage HW, CW, or UW, or have a high potential for HW generation or HS violations.

(8) Collect waste identification samples and submit for laboratory analysis, if necessary.

(9) Pay annual HW operating fee and annual HW generating fee.

(10) Prepare HW permit and HW transporter permit renewal applications.

6. GENERAL REQUIREMENTS

6.1 WASTE IDENTIFICATION

a. A waste is something that can no longer be used or is intended for disposal.

b. All waste must be evaluated to determine the proper disposal method. This includes anything thrown in the trash, poured down the drain, turned-in to the DLA Disposition Services Jackson, picked-up by a contractor, etc.

c. For common wastes, refer to the Fort Jackson Environmental Guidebook. For uncommon or site-specific wastes, call the EMB at 751-4231 for a waste determination. The FJ HS Program Manager will determine if the waste you generate is hazardous by looking at the SDS that came with the product. If it is a combination of wastes, or a spent product, then a laboratory analysis is generally used to make a determination.

d. Information from the label is sometimes used to make a waste determination. Whenever possible, keep HM in the original container. If a HM is transferred to another container, the new label must identify the product name and manufacturer.

6.2. WASTE MINIMIZATION

a. FJ must eliminate or reduce the purchase and use of HM (especially those containing toxic chemicals), eliminate the unnecessary disposal of unused HM, and minimize the quantity and toxicity of waste generated.

b. The waste minimization hierarchy is: Reduce, Reuse, Recycle, and Dispose only as a last resort. Source reduction can be achieved through material substitution, good housekeeping, HM control, process or equipment change, and waste segregation.

c. Usable HM may only be disposed after exhausting all other options. You should first attempt to return it to the supplier or manufacturer. If this is not possible, give it to another organization that can use it or store it for future use. Advertise your excess material via e-mail.

d. Empty containers should be reused whenever possible. Empty paint cans and 5-gallon plastic pails should be turned in to the Reuse Center for reutilization or recycling. Triple-rinsed steel drums and steel cans may be recycled as scrap metal.

6.3. HAZARDOUS SUBSTANCE (HS) MANAGEMENT

a. All containers must be in good condition, clean, and marked or labeled to identify the contents. The label must be legible. Containers must be tightly sealed when not in use.

b. If a container is in poor condition, the contents must be transferred to a new container or the damaged container must be over packed (i.e. placed in a larger container). The new label must identify the product name and manufacturer. HS should never be placed in a container that previously held food or drink!

c. Containers must be compatible with the contents (i.e. strong corrosives should not be stored in metal containers) and HS should not be placed in a container which previously held an incompatible substance. Information about compatibility is included in the SDS.

d. All HM must be inventoried monthly using a Hazardous Chemical Inventory Form (HCIF). The HCIF must be turned in to the HMMS Office (751-5121) by the 10th of each month. *See Appendix A for a blank HCIF.*

e. A SDS must be maintained for each HS. SDSs must be located near all HS storage and handling areas, and must be easily accessible by all employees.

f. Before purchasing new items:

(1) Check your HCIF. Contact the HMMS Office (751-5121) to find out if other organizations have excess quantities.

(2) Check the Reuse Center (751-5121) for paint related materials, common building supplies, common household HM, and office supplies.

(3) Contact other organizations (on-post and off-post) to see if they have excess.

(4) Determine if personal protective equipment or cleaning solutions will be needed.

(5) Determine if a non-hazardous, non-shelf-life, or recycled item can be procured.

(6) Determine if a HW will be generated. This should be avoided whenever possible.

g. When purchasing new items:

(1) Comply with Green Purchasing Program (GPP) requirements. GPP concerns the purchase of environmentally preferable products and services. For more information, visit http://www.epa.gov/epawaste/conserve/tools/cpg/index.htm. *Note: Federal agencies are required to purchase recycled engine coolants, re-refined lubricating oil, and retread tires.*

(2) Purchase the least hazardous product that will do the job. Minimize or eliminate the use of toxic chemicals (such as lawn and garden products).

(3) Purchase only what you need (do not stockpile). Do not purchase multiple brands of the same product (i.e. 5 different glass cleaners or 20 different all-purpose cleaners).

(4) Avoid items that cannot be returned to the store (such as custom colored paints).

(5) Check expiration dates. Only purchase what can be used prior to the expiration date.

(6) Save your receipts.

(7) Update the HCIF. Add new or revised SDSs to your file.

h. When storing HS:

(1) Storage areas must be kept neat through good housekeeping practices.

(2) Storage areas should be covered and secure to protect the containers from the weather and tampering.

(3) Store containers inside whenever possible to prevent containers from rusting and prevent product spoilage due to heat or cold.

(4) Store containers on a paved surface, away from floor drains, storm drains, or hazards that might lead to a spill, to prevent soil or water contamination if a leak or spill should occur.

(5) Store large containers (>10 gallons) on pallets to prevent rusting and aid in leak detection and spill prevention.

(6) Provide secondary containment to hold volume of largest container.

(7) Separate incompatible substances, using the SDS for guidance. Call the Safety Office (751-6004/2542) for additional assistance.

(8) Storage of flammable liquids (those with a flash point ≤ 140°F) must comply with FJ Reg 420-90, "Fire Prevention and Protection Services". To view this regulation, go to the Y: drive, open the "DES" folder, open the "Fire Dept" folder, open the "Regulations" folder, and click on "FJ Reg 420-90".

(9) Use a log, calendar, or other procedure to avoid shelf-life expiration. Request shelf-life extensions for expired items. The policies for optimizing shelf-life are contained in the DoD 4140.27-M, Shelf-Life Management Manual, at https://www.shelflife.hq.dla.mil/policy_DoD4140_27.aspx.

(10) Inspect storage areas at least weekly. The area should be free of ground stains, spills, odors, or fumes. Containers should be in good condition, clean, marked or labeled, tightly sealed, and not expired.

i. When using HM:

(1) Follow manufacturer's instructions.

(2) Use the oldest HM first (or any containers in poor condition).

(3) Use the least amount necessary to do the job.

(4) Use up the entire product and then reuse or recycle the empty container, if possible.

(5) Return, give away, or turn in excess items that you don't plan on using.

(6) Update the HCIF when a container is used up or transferred to another location.

j. Evaluate wastes to determine the proper disposal method. Do not mix wastes - you take the risk of turning a non-HW into a HW. Contact the FJ HS Program Manager for assistance.

6.4. HAZARDOUS WASTE (HW) MANAGEMENT

a. HW must be carefully managed IAW DHEC regulations. The following are examples of common HW generated on FJ: spent (unusable) mineral spirits, paint thinner, and some solvents; gasoline contaminated soil or absorbent; rifle bore patches/swabs used with unapproved products, such as WD40 or carburetor cleaner; unused MRE heaters; M17 or M40 gas mask filters (C2 filters only). *See the Fort Jackson Environmental Guidebook for specific instructions and exceptions.*

b. HW must be stored in a HW Satellite Accumulation Area (SAA) or HW Container Storage Area (CSA). Requirements common to both are:

(1) Once HW is placed in a container, a HW label must be put on the container and the contents identified. HW labels are available from EMB (751-4231).

(2) HW must not be mixed. Separate storage containers are required for each type of HW.

(3) If other items are stored in the same area as HW, the boundary of the SAA or CSA must be clearly identified by placing tape on the floor or some other means of identification.

(4) Site-specific spill response plans, spill response kits, and SDS files must be displayed prominently near all HW storage areas.

(5) HW storage areas must be inspected weekly. The inspections must be documented and kept near the storage area for review by an inspector. *See Appendix B for HW inspection forms.*

(6) Containers holding ignitable or reactive waste must be at least 50 feet from the base property line, and must be separated and protected from sources of ignition or reaction.

c. Requirements specific to a SAA:

(1) The total volume of HW must not exceed 55 gallons (1 quart of acute HW) for more than 72 hours (3 days).

(2) The accumulation start date must be marked on the HW label when the 55 gallon limit (or 1 quart of acute HW) is reached. The HW must be moved to a CSA or transported off-post to a permitted treatment, storage, or disposal facility within 72 hours of the accumulation start date.

(3) The SAA must have a sign identifying it as a "Hazardous Waste Satellite Accumulation Area/No Smoking". SAA signs are available from EMB (751-4231).

(4) The SAA must be located near the point of generation.

d. Requirements specific to a CSA:

(1) The accumulation start date must be marked on the HW label immediately when HW is first placed in the container.

(2) An unlimited volume of HW can be accumulated; however, each container must be transported off-post to a permitted treatment, storage, or disposal facility within 90 days of the accumulation start date.

(3) The CSA must have a sign identifying it as a "Hazardous Waste Container Storage Area/No Smoking".

(4) An alarm system, communication device, fire control, and spill response equipment must be available.

(5) The Fire Department, EMB, hospital, and police must be supplied with a layout of the CSA and a HW inventory.

(6) A copy of the Installation Spill Contingency Plan (ISCP) must be kept near the CSA.

6.5. UNIVERSAL WASTE (UW) MANAGEMENT

a. UW must be carefully managed IAW DHEC regulations. The following are examples of UW: lamps (i.e. light bulbs), batteries, mercury-containing equipment (such as thermometers or thermostats), and unused pesticides. *See the Fort Jackson Environmental Guidebook for specific instructions and exceptions.*

b. It is against the law to mismanage UW. UW must be placed in containers and sealed. Containers must remain closed and lack evidence of leakage, spillage, or damage. UW must be managed in a way that prevents releases to the environment.

c. The accumulation start date and contents must be marked on the container when UW is first placed in the container (i.e. "Used Lamps", "Used Batteries", "Used Mercury-Containing Equipment", and "Waste-Pesticides").

d. UW must be turned in to the EMB within 6 months from the start date. *Note: Organizations in the LRC/DPW Maintenance Complex may take their used lamps to DPW Supply.*

6.6. CONTROLLED WASTE (CW) MANAGEMENT

a. CW must be carefully managed IAW DHEC regulations. The following are examples of CW: used antifreeze, used cooking oil/grease, used motor oil, used oil filters. *See the Fort Jackson Environmental Guidebook for specific instructions and exceptions.*

b. CW must be placed in containers and sealed. The contents must be marked on the container when CW is first placed in the container.

6.7. NON-HAZARDOUS WASTE (NON-HW) MANAGEMENT

a. Any waste that does not meet the definition of HW, UW, or CW is considered non-HW. Disposal of non-HW must comply with solid waste and wastewater regulations, and FJ policy.

b. Liquids and recyclables may not be placed in trash cans, dumpsters, or roll-off bins.

c. The following liquids may not be poured down the drain: any waste that is viscous (i.e. thick) or contains solids capable of obstructing flow, has a pH <6 or >9, or contains more than 100 mg/l oil or grease. These liquids require special handling.

d. The following are examples of non-HW: punctured aerosol cans, used MRE heaters, latex (water-based) paint. *See the Fort Jackson Environmental Guidebook for specific instructions and exceptions.*

6.8. DISPOSAL PROCEDURE

a. Call the EMB (751-4231) and make written request (heather.s.thomas8.civ@mail.mil) to request disposal. EMB personnel will inspect the container(s) and prepare a HW Profile Sheet and a DD Form 1348-1 Turn-in Document. A SDS or laboratory analysis is required to complete the paperwork. The paperwork must be signed by the HS Manager (or their designee). The DLA Disposition Services Jackson will make arrangements for a contractor to pick up the waste after the EMB provides them with the signed documentation.

b. The container(s) will remain at the generating organization prior to pick-up. If the container(s) need(s) to be moved prior to pick-up, this action will be coordinated by EMB.

c. The FJ HS Program Manager is the only person on FJ with the authority to sign HW manifests. Any organization that plans to have a contractor pick up their waste must first coordinate with EMB (751-4231).

6.9. TRANSPORTATION

a. Transportation of HW off-post by unauthorized personnel is a federal offense, punishable by imprisonment and/or fines.

b. Transportation of HW and HM on-post requires a DOT placard, unless the vehicle is operated by a government employee, or the transportation occurs entirely on non-public roads. However, even if a placard is not required certain precautions must be taken to ensure safe delivery.

(1) All containers must be secured within the vehicle to prevent spills and accidents. Loads must be balanced in the vehicle lengthwise and crosswise, and braced to prevent movement.

(2) When loading and unloading reactives, care must be taken to keep them dry, out of wet weather, and away from ignition sources.

(3) Keep ignitables away from heat and ignition sources. DO NOT load or unload ignitables from a motor vehicle while the engine is running.

(4) Do not transport incompatible HS together in the same vehicle.

6.10. TRAINING REQUIREMENTS

a. All personnel who manage or handle HS must be trained to respond to spills or other emergencies, protect the environment, and properly handle and dispose of the waste. Training must be completed within six months of employment. HS training includes:

(1) Hazard Communication (HAZCOM) training is required for all personnel exposed to HS. This training is conducted by the organization's Additional Duty Safety Officer (ADSO). Call the Safety Office (751-6004/2542) for additional information.

(2) HS awareness training for ECOs is included in the mandatory ECO Course conducted by ENV. Call ENV (751-5011) to register.

(3) The HS Management Class is required annually for all HS Managers. The class is held quarterly. Additional classes are available upon request. The class is tailored to the participants and is one to four hours in length. Call EMB (751-4231) to register or get additional information.

b. Training files must be updated after each training session, must be readily accessible, and must be kept for at least three years from the employee's termination date. The following documentation must be maintained in the employee's training file:

(1) The HW Training Record or similar records that contain the following: employee's name, job title, job description, and amount and type of training completed (both formal and on-the-job). *See Appendix C for a blank HW Training Record.*

(2) A certificate documenting formal training completed by the employee, or a DD Form 1556 if a certificate is not available.

(3) Documentation for informal on-the-job training that includes topics covered, class time, list of attendees, and instructor's signature.

6.11. SPILL RESPONSE

a. It is the responsibility of each organization to maintain site-specific spill response plans, spill response kits, and SDS files and display these items prominently near all HS storage and handling areas. These items must be far enough away that they can be accessed in the event of a spill. *See Appendix D for a sample Spill Response Plan.*

b. Personnel must be trained in response procedures and how to use the equipment. Training should emphasize "safety first".

c. Spill response kits must be sufficient to handle the volume of the largest container. Spill kits can be made from locally purchased items and will vary depending on the type and quantity of HS stored or handled. A "Spill Kit" sign must be posted above the spill kit or directly on the container.

d. All spills greater than 5 gallons, or spills of any size that can not be safely contained and cleaned up by organization personnel, must be immediately reported to the FJ Fire Department at 911. Spills that are 5 gallons or less must be reported if the spill enters a storm drain, creek, lake, or other body of water, or if not immediately cleaned up.

e. The FJ Installation Spill Contingency Plan (ISCP) establishes procedures and identifies resources for the control and cleanup of HS spills. After receiving notification of a spill, the FJ Fire Department will implement the ISCP. A copy of the ISCP must be located near each CSA, but is not required at other HS storage areas.

6.12. INSPECTIONS

a. HS storage areas must be inspected, at least weekly, for deterioration of containers and the containment system. HW inspections must be documented and kept near the storage area for review by an inspector. Federal regulations require CSA inspection forms to be retained for at least 3 years. SAA inspection forms must be retained for at least 1 year. *See Appendix B for HW inspection forms.*

b. Scheduled and unannounced environmental compliance inspections are routinely conducted by the EMB. Deficiencies observed during the inspections are documented and submitted to the Commander or Director for corrective action. All inspection results, both positive and negative, may be forwarded to the Commanding General for review.

c. Unannounced compliance inspections are routinely conducted by outside agencies. Violations found during a regulatory inspection will result in a warning letter or Notice of Violation (NOV) and can result in fines and/or possible criminal/civil actions.

6.13. REPORTING AND RECORD KEEPING

a. The following documents should be maintained at each organization:

(1) HSMP and Environmental Guidebook

(2) FJ Regulation 200-8 "Environmental Protection and Enhancement"

(3) FJ Regulation 350-14 "Post Range Regulation" – Units only

(4) ECO appointment letter

(5) SDSs - A SDS must be available for all HS.

(6) HCIFs

(7) HW training records - Federal regulations require retention for at least three years from the employee's termination, departure, or transfer date.

(8) Site-specific spill response plan

(9) ISCP (only at CSAs)

(10) HW inspection form (if applicable) - Federal regulations require CSA inspection forms to be retained for at least three years. SAA inspection forms must be retained for at least one year.

(11) Fort Jackson Unit and Activities Environmental Compliance Checklist

b. Any organization that has a contractor pick-up their waste (such as batteries or oil/water separator sludge), must provide EMB (751-4231) with pertinent data, including pick-up date, type of waste, and quantity, immediately after shipment. The FJ HS Program Manager is the only person on FJ with the authority to sign HW manifests. Any organization that plans to have a contractor pick up HW must first coordinate with EMB (751-4231).

c. Any organization that has a SAA or CSA must provide EMB (751-4231) with the amount (volume or weight) of HW in storage at the end of each month.

7. REFERENCES.

a. South Carolina HW Management Regulations

b. DOT, 49 CFR 171-173

c. EPCRA, 40 CFR 355 & 370

d. AR 200-1, Environmental Protection and Enhancement

e. FJ Reg 200-8, Environmental Protection and Enhancement

f. FJ Reg 420-90, Fire Prevention and Protection Services

g. FJ Reg 385-10, Hazard Communication

h. AR 420-1, Army Facilities Management, chapter 25, Fire & Emergency Services

i. FAR Part 23, Environment, Energy and Water Efficiency, Renewable Energy Technologies, Occupational Safety, and Drug-Free Workplace

8. SCHEDULE OF REVIEW. The HSMP will be reviewed and evaluated for revision at least once every three years.

9. REVISION HISTORY.

Revision Number	Date of Revision	Revision Summary
1	September 2014	Updated contact information and terminology.

10. COPIES OF THE PLAN. A copy of the plan will be maintained by all ECOs and HS Managers.

APPENDIX A

HAZARDOUS CHEMICAL INVENTORY FORM

Bldg#: _____
Cost Center: _____
SSP: _____

Date: _____
POC/Phone: _____
E-mail: _____

NSN	Nomenclature	Manufacturer & Part No. Information	Unit of Issue	SDS Number	Unit Price	Beginning Inventory	Amount Used	Amount Purchased	Ending Inventory

APPENDIX B

SATELLITE ACCUMULATION AREA INSPECTION FORM

ITEM TO BE INSPECTED	Wk 1	Wk 2	Wk 3	Wk 4	Wk 5	CORRECTIVE ACTION NEEDED	DATE COMPLETED
AREA							
Warning signs are present & legible							
Area is secured & covered							
Area is clean & neat							
Total volume of HW is less than 55 gal (1 qt of Acute HW)							
CONTAINERS							
Incompatible containers are segregated							
Containers are properly labeled & the contents identified							
Containers are in good condition							
Large containers are on pallets							
There are no spills, odors, or fumes present							
Containers are tightly sealed							
SPILL RESPONSE PLANNING							
Spill supplies are readily available							
Spill response plan is nearby							
SDS file is nearby							

Location of SAA _____

Week 1 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 2 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 3 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 4 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 5 – Inspection Date/Time: _____ Signature of Inspector: _____

Amount of HW in storage at end of month _____

CONTAINER STORAGE AREA INSPECTION FORM

ITEM TO BE INSPECTED	Wk 1	Wk 2	Wk 3	Wk 4	Wk 5	CORRECTIVE ACTION NEEDED	DATE COMPLETED
AREA							
Warning signs are present & legible							
Area is secured & covered							
Area is clean & neat							
Aisle space is adequate							
CONTAINERS							
Incompatible containers are segregated							
Containers are properly labeled & the contents identified							
Accumulation start date is within 90 days							
Containers are in good condition							
Large containers are on pallets							
There are no spills, odors, or fumes present							
Containers are tightly sealed							
SPILL RESPONSE PLANNING							
Spill supplies are readily available							
Spill response plan/ISCP is nearby							
An alarm system, communication device, and fire control is available							
SDS file is nearby							

Location of CSA _____

Week 1 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 2 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 3 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 4 – Inspection Date/Time: _____ Signature of Inspector: _____

Week 5 – Inspection Date/Time: _____ Signature of Inspector: _____

Amount of HW in storage at end of month _____

APPENDIX C

HAZARDOUS WASTE TRAINING RECORD

NAME: _____
ORGANIZATION: _____
JOB TITLE: _____
JOB DESCRIPTION*: _____

DATE EMPLOYED: _____
TYPE AND AMOUNT OF TRAINING REQUIRED:
INTRODUCTORY: _____

UPDATE: _____

TYPE AND AMOUNT OF TRAINING COMPLETED **	DATE

* Detail exactly the HW duties of the employee.
** Attach additional sheets describing the course content or lesson plans.

APPENDIX D

Spill Response Plan

The goal of the spill response plan is to reduce safety, health, and environmental risks associated with a hazardous substance incident. In the event of a spill, the following actions should be implemented:

SECURE AND EVACUATE THE AREA - Keep unauthorized persons out of the area.

REPORT THE SPILL - All spills >5 gallons must be immediately reported to the Fire Department at 911. Spills that are ≤5 gallons must be reported if the spill enters a storm drain, creek, lake, or other body of water, or cannot be safely contained and cleaned up by organization personnel. Provide any pertinent information, including:

- Substance spilled.
- Location of spill.
- Nature and extent of injuries.
- Extent to which spill traveled.
- Estimated amount spilled.
- Time spill occurred.

PROTECT YOURSELF - Extinguish smoking material and ignition sources. Identify the substance spilled and obtain appropriate personal protective equipment, such as:

- Protective Goggles.
- Protective Apron.
- Rubber Overboots.
- Compatible Rubber Gloves.
- Respirators.

STOP THE FLOW - Stop or slow flow of hazardous substance if it can be done safely.

- Plug or patch punctured container(s).
- Upright overturned or tipped container(s).
- Close appropriate valve(s).

CONTAIN THE SPILL - The spilled substance should be contained within the immediate area. Prevent flow to drains, drainage ditches, and sewer systems if it can be done safely.

- Place nonreactive absorbent material such as sand, earth, straw, vermiculite, absorbent pillows or booms on the spill.
- Block the spill from entering storm drains or sewers by constructing a dike around all points of entry.
- If the spill is on the ground, clean it up immediately by digging up the contaminated soil, placing it in proper containers, and disposing of it properly.

APPENDIX E
ACRONYMS

ADSO	Additional Duty Safety Officer
CSA	Container Storage Area
CW	Controlled waste
DHEC	South Carolina Department of Health and Environmental Control
DOT	Department of Transportation
DPW	Directorate of Public Works
ECO	Environmental Compliance Officer
EMB	Environmental Management Branch
ENV	Environmental Division
EPA	U.S. Environmental Protection Agency
FJ	Fort Jackson
GPP	Green Purchasing Program
HAZCOM	Hazard Communication
HCIF	Hazardous Chemical Inventory Form
HM	Hazardous material
HMMS	Hazardous Material Management System
HS	Hazardous substance
HSMP	Hazardous Substance Management Plan
HW	Hazardous waste
IAW	In accordance with
ID	Identification
ISCP	Installation Spill Contingency Plan
LRC	Logistics Readiness Center
NOV	Notice of violation
PCB	Polychlorinated biphenyl
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Area
SCARNG	South Carolina Army National Guard
SDS	Safety Data Sheet
UW	Universal waste