



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
PO BOX 9001
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NASKWINST 5090.2C
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3 Jun 13

NAVAL AIR STATION KEY WEST INSTRUCTION 5090.2C

Subj: HAZARDOUS WASTE MANAGEMENT PLAN

Ref: (a) OPNAVINST 5090.1C
(b) 40 Code of Federal Regulation (CFR) 260-268, 270, 273
(c) 40 CFR 278
(d) 40 CFR 266.400
(e) 49 CFR 171-180
(f) 49 CFR 390-397
(g) 40 CFR 112, 116-117
(h) Title 29 CFR 1910.120
(i) Title 29 CFR 1910.1200
(j) Florida Administrative Code 62-730
(k) NASKWINST 8026.1B
(l) NASKWINST 4026.1C

Encl: (1) Naval Air Station Key West Hazardous Waste Management Plan (HWMP)

1. Purpose. Per reference (a) through (l), establish and implement a HWMP for Naval Air Station (NAS) Key West. This HWMP provides instruction and guidance for the management of regulated waste generated by all commands and contractors operating aboard NAS Key West.

2. Cancellation. NASKWINST 5090.2B

3. Discussion. The HWMP has been prepared per reference (a) which specifically requires Navy Shore activities to develop and use a hazardous waste management plan in compliance with all applicable federal, state and local regulations. Enclosure (1) assigns responsibilities and provides instructions for appropriate waste handling and management to ensure conformance with the requirements of the U. S. Environmental Protection Agency (EPA) and the State of Florida hazardous waste regulations. The policy and procedures contained in the HWMP apply to all personnel and operations at NAS Key West.

4. Action. Implement and comply with the provisions of the HWMP.


P. A. LEFERE

Distribution: (NASKWNOTE 5216)
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ACRONYMS AND ABBREVIATIONS

AFS.....	Air Force Station
ATMO.....	Atlantic Target and Marine Operations
BHC.....	Branch Health Clinic
BMP.....	Best Management Practices
CA.....	Contracting Authority
CDO.....	Command Duty Officer
CE.....	Conditionally Exempt
CFR.....	Code of Federal Regulation
DDA.....	Designated Disposition Authority
DDESB.....	Department of Defense Explosive Safety Board
DLA.....	Defense Logistics Agency
DOD.....	Department of Defense
DODAC.....	Department of Defense Ammunition Code
DOE.....	Department of Energy
DOT.....	Department of Transportation
EHM.....	Excess Hazardous Material
EHW.....	Explosive Hazardous Waste
EMS.....	Environmental Management Systems
EOD.....	Explosive Ordnance Detachment
EPCRA.....	Emergency Planning Community Right-to-know Act
ESO.....	Explosive Safety Office
FAC.....	Florida Administrative Code
FDEP.....	Florida Department of Environmental Protection
FISC.....	Fleet and Industrial Supply Center
FRP.....	Facilities Response Plan
FSC.....	Federal Supply Class
HAZMAT.....	Hazardous Materials
HAZMIN.....	Hazardous Material Minimalization
HSMST.....	High Speed Manuevering Surface Target
HM.....	Hazardous Material
HW.....	Hazardous Waste
HWMP.....	Hazardous Waste Management Plan
HWSF.....	HW Storage Facility
IC.....	Incident Commander
IEPD.....	Installation Environmental Program Director
JIATFS.....	Joint Inter Agency Task Force South
MM.....	Military Munitions
MMR.....	Military Munitions Rule
MSDS.....	Material Safety Data Sheets
NA.....	North America
NALC.....	Navy Ammunition Logistics Code
NAS.....	Naval Air Station

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NASKW	Naval Air Station Key West
NAVAIR	Naval Air Systems Command
NBHC	Naval Branch Health Clinic
NGIS	Navy Gateway Inns and Suites
NSGA	Naval Security Group Activity
NMC	Navy Munitions Command
NOV	Notice of Violation
NRL	Navy Research Lab
NSN	National Stock Number
OPNAVINST	Naval Operations Instruction
OSHA	Occupational Safety Health Administration
POL	Petroleum, Oil, and Lubricants
PPE	Personnel Protection Equipment
PWD	Public Works Department
PWO	Public Works Officer
RCRA	Resource Conservation and Recovery Act
RDT&E	Research, Development, Test and Engineering
RQ	Reportable Quantity
SAA	Satellite Accumulation Area
SARP	Substance Abuse Rehabilitation Program
SFWOD	U.S. Army Special Forces Waterborne Operations Division
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasures Plan
SW	Solid Waste
TCLP	Toxicity Characteristic Leaching Procedure
TOC	Total Organic Carbon
TSDF	Treatment, Storage, or Disposal Facility
TSS	Total Suspended Solids
UHC	Underlying Hazardous Constituent
USAF	US Air Force
USCG	U.S. Coast Guard
USEPA	U.S. Environmental Protection Agency
UTS	Universal Treatment Standards
UW	Universal Waste
UXO	Unexploded Ordnance
WMM	Waste Military Munitions
WID	Waste Identification Documents
WSD	Waste Stream Determinations

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1.0 INTRODUCTION.

Naval Air Station (NAS) Key West is located on Boca Chica Key, Monroe County, Florida approximately eight miles east of Key West, Florida and approximately 150 miles southwest of Miami, Florida. NAS Key West includes several annexes near Key West, Florida and encompasses approximately 6,433 acres. This Hazardous Waste Management Plan (HWMP) addresses all sites at NAS Key West; Boca Chica Field, Trumbo Point Annex, Truman Annex, Fleming Key, Sigsbee Park Annex, Saddlebunch Key, and the Naval Branch Health Clinic on Key West.

The mission of NAS Key West is to "Support operational and readiness requirements for DoD, DHS, National Guard, Federal Agencies and Allied Forces." The surrounding annexes support NAS Key West and its mission.

Hazardous Waste (HW) Generator Identification Numbers are site specific (physical location), each annex has its own HW Generator Identification.

This updated plan is effective immediately. The policy and procedures contained in the HWMP apply to all personnel and operations at NAS Key West. Copies of the HWMP are maintained in the office of the Environmental Division of the Public Works Department and are available for the benefit of all employees and for review upon request of authorized officials.

1.1 Authority:

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

Naval Operations Instruction (OPNAVINST) 5090.1C requires all shore installations to develop a HWMP in accordance with applicable federal, state, and local regulations.

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1.2 Applicability:

This HWMP provides guidance for the proper management of regulated waste by departments, tenant commands and contractors operating aboard NAS Key West. The HWMP meets the requirements of the USEPA and the State of Florida; therefore, compliance with this plan ensures compliance with the regulations.

This HWMP does not address the management of waste in the RCRA permitted HW Storage Facility (HWSF) as those requirements are clearly set forth in the permit and application.

1.3 Purpose:

This HWMP provides instruction and guidance for the management of regulated waste generated by all commands and contractors operating aboard NAS Key West.

1.4 Applicable Regulations:

The procedures and requirements set forth in this HWMP are mandated by regulations; therefore, they are not discretionary. There is a potential for fines and criminal liability for persons violating HW regulations. Specific regulatory citations related to HW management are as follows:

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

b. 40 CFR 279. The USEPA regulation for the management of Used Oil and Used Oil filters including reporting, storage, disposal, recycling for energy value and other related requirements.

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

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d. 49 CFR 171-180. The Department of Transportation (DOT) regulations for the shipment of Hazardous Material (HM) and Hazardous Waste (HW) across public highways. The regulations include the requirements for packaging, labeling, marking, and the placarding of vehicles. The DOT regulations include design specifications for containers used to hold HM/HW during transportation and specific closure requirements for those containers.

e. 49 CFR 390-397. The DOT regulations that govern the qualifications of the drivers, the equipment in the vehicle, and in some cases, the route the HM/HW shipments must take during transport.

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

g. 40 CFR 116-117. The USEPA regulations governing when and how a release or spill of a chemical in quantities exceeding the reportable quantity (RQ) must be reported to the National Response Center.

h. Florida Administrative Code (FAC) 62-730. Florida Department of Environmental Protection (FDEP) adopted by reference the majority of the federal regulations found in 40 CFR Parts 260-279. The EPA granted FDEP the authority to enforce environmental regulations within the State of Florida.

2.0 DEFINITIONS.

a. Accumulation Start Date.

(1) Accumulation Start Date at a Satellite Accumulation Area (SAA) is whichever occurs first:

a. The date the total amount of HW stored in the SAA exceeds the 55-gallon limit, or

b. The date the HW container is picked up from the SAA.

(2) Accumulation Start Date at less than 90-day storage areas:

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a. The accumulation start date is the date the first drop or item is placed into the HW container, or

b. The date that a container is moved from a satellite accumulation area (SAA) into the less than 90-day storage area or the HWSF.

(3) Accumulation Start date for Universal Waste: The date the first item of waste is placed into the container.

b. Acute Hazardous Wastes. Include the dioxin-containing F-wastes having and (H) code in 40 CFR 261.31 and the P-listed chemicals.

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

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

e. Characterization. The process of identifying waste constituents, their concentrations, and the work process generating the waste. Characterization is required to identify the USEPA Waste Codes, the Underlying Hazardous Constituents, and the DOT Proper Shipping Name to ensure the waste is properly handled, treated, and disposed.

f. Container. Any portable device in which a material is stored, transported, treated, or disposed.

g. Contaminant. Any chemical that when present causes the waste to be regulated.

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- h. Contaminated Medium/Media. Soil, sediment, surface water, groundwater or air that contains a contaminant subject to regulations.
- i. Contingency Plan. A document that contains an organized, planned, and coordinated course of action to be taken in case of a fire, explosion or release of a hazardous material or waste.
- j. Debris. Any solid material, with a diameter of 2.4 inches or larger, intended for disposal including manufactured objects, plants or animal matter, or natural geologic material; this includes brushes, rags, rollers, personnel protection equipment (PPE), large and small equipment, etc.
- k. Dilution. The deliberate mixing of HW with another material for the purpose of changing either the characteristic(s) or the concentration of a constituent in the waste. Dilution of a HW is **prohibited**.
- l. Disposal. The proper treatment of a waste in accordance with regulations, then if appropriate the placement of the HW residues into a permitted HW disposal facility (landfill) meeting the land disposal restrictions requirements.
- m. Empty Container. Any HM or HW container, except a compressed gas cylinder, aerosol can or an acute HW container, that has had all wastes removed by commonly employed techniques for the type of container, e.g., pouring, pumping, and aspirating, or with the approval of the regulatory agency and the installation:
- (1) No more than 2.5 centimeters (one inch) of residue remain in the bottom of the container; or
 - (2) No more than 3 percent by weight of the total capacity of the container remains in the container if the container is less than or equal to 119 gallons in size.
 - (3) A compressed gas is empty when the pressure inside the container approaches atmospheric pressure.
 - (4) A container with an inner liner shall have the liner removed.

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- n. EPA Hazardous Waste Codes. The specific alphanumeric sequence assigned by the USEPA to specify type and characteristic of a HW.
- o. Excess Hazardous Material (EHM). Full or partially full containers of HM, exceeding the activity's requirements or, that are no longer needed and may be used by another activity or by a commercial industry.
- i. Free Liquids. The liquid component of a waste.
- j. Generator. Any person by site whose act first causes a waste to be subject to regulations.
- k. Hazardous Debris. Debris that contains a listed HW or that exhibits a characteristic of HW.
- l. Hazardous Material (HM). Any material that because of its quality, concentration, physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment when incorrectly used, purposefully released, or accidentally spilled.
- m. Hazardous Waste (HW). Before a waste can be a HW, it must first meet the definition of a Solid Waste (SW). A solid waste is a HW if it is a chemical listed in 40 CFR 261 or if a chemical listed in 40 CFR 261 is the sole active ingredient of a commercial product; or if a SW exhibits one or more of the HW characteristics listed below:
- (1) Ignitable. A material that is:
- a. liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, that has a flash point less than 140° F;
 - b. a non-liquid capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes, **and** when ignited burns so vigorously and persistently that it creates a hazard;
 - c. an ignitable compressed gas; or
 - d. an oxidizer.

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(2) Corrosive. a material that is:

a. an aqueous (water) solution that has a pH equal to or less than 2.0 or equal to or greater than 12.5; or

b. a non-aqueous liquid capable of corroding steel at a rate greater than 0.25 inches per year.

(3) Reactive. A material that:

a. is normally unstable and readily undergoes violent change without detonating;

b. reacts violently with water;

c. forms potentially explosive mixtures with water;

d. when mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

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

f. is capable of detonation or explosive reaction if it is subjected to a strong ignition source or is heated under confinement;

g. is readily capable of explosive detonation or reaction at standard temperature and pressure; or

h. is a forbidden explosive or a Class A or Class B explosive as defined in 49 CFR 173.51, 173.53, or 173.88, respectively.

(4) Toxic. A material, using the toxicity characteristic leaching procedure (TCLP), leaches one or more hazardous constituents at a concentration equal to or greater than the concentration listed in 40 CFR 261.24.

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- n. Hazardous Waste Constituent. The chemical (constituent) that causes the waste to be regulated.
- o. Incompatible Waste. Wastes that, when in contact with one another, have the potential to produce heat or pressure, fire, explosion, violent reaction, toxic or flammable dusts, mists, fumes, or gases.
- p. Inner Liner. A continuous layer of material placed inside a container that separates the container from the material stored in it.
- q. Lamp (Light Bulbs). The bulb or tube portion of electric lighting devices. Common universal waste (UW) lamps include fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium and metal halide.
- r. Leachate. The liquid, including any suspended components in the liquid, which has percolated through or drained from a waste.
- s. Manifest. The shipping document EPA Form 8700-22 (including, if necessary, EPA Form 8700-22A), originated and signed by the generator, that accompanies and is used for tracking the transportation of HW.
- t. Manifest Tracking Number. The alphanumeric identification number pre-printed in Item 4 of the manifest by a registered source.
- u. Mercury-Containing Equipment. Any device or part of a device (excluding batteries and lamps) that contains elemental mercury.
- v. Military Munitions (MM). All ammunition and their components produced or used by or for the U.S. Department of Defense (DOD) or the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense (DOD), the U.S. Coast Guard (USCG), the U.S. Department of Energy (DOE), and the National Guard.
- w. Offsite Location. For the purposes of this HWMP, offsite location means any location that generates hazardous waste, universal waste or other regulated waste that is not contiguous

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with Boca Chica Key (e.g., Truman Annex, Trumbo Point Annex, Fleming Key, Sigsbee Park Annex, BHC, Saddlebunch).

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

y. Point of Generation. Location (and date) that a material first becomes subject to the HW regulations.

z. Profile Number. The unique alphanumeric identification number used to designate a specific waste stream.

aa. Profile Sheet. The DRMS DD-1930 or other forms that are used to document specific disposal information for each waste stream sent to the disposal facility.

bb. Representative Sample. A sample that when analyzed can be expected to exhibit the average properties of all material in the container.

cc. Sludge. Any solid, semi-solid, or liquid waste generated by a wastewater treatment plant, water supply plant, or air pollution control facility. This does not include the treated effluent from a wastewater treatment plant.

dd. Soil. Unconsolidated earth material composing the superficial geologic strata, consisting of clay, silt, sand, or gravel size particles, or a mixture of such materials with liquids, solids, and sludges.

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

ff. Sorbent. A material used to soak up free liquids by either adsorption or absorption, or both.

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gg. Spill. The accidental or intentional leaking, pumping, emitting, emptying, or dumping of a HM, SW, or HW into or on any land or surface waters.

hh. Thermostat. A temperature control device that contains metallic mercury.

ii. Toxicity Characteristic Leachate Procedure (TCLP). The analytical procedure used to determine if a solid waste leaches contaminants into the environment.

ii. Transportation. The movement of HM/HW by air, rail, highway, or water.

jj. Transporter. A person engaged in the offsite transportation of hazardous material/waste.

kk. Treatment. Any method, technique, or process designed to change the physical, chemical, or biological character or composition of any HW so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. Treatments include but are not limited to, either physical or chemical extractions, chemical or thermal destruction. The residues from these treatments shall be managed in accordance with regulations.

ll. Underlying Hazardous Constituent (UHC). Any constituent listed in 40 CFR 268.48, which may reasonably be expected to be present at the point of generation of a characteristic hazardous waste at a concentration above the constituent-specific Universal Treatment Standards (UTS).

mm. Universal Waste (UW). Batteries, fluorescent lamps, some pesticides, and mercury-containing equipment formally classified as a HW, but that are now subject to less stringent regulations, when recycled if recycling is available.

nn. Used Oil. Any oil, refined from crude oil or synthetic oil that, as the result of storage or use, is contaminated with physical or chemical impurities. Used oil does not include oil water mixtures that are mostly water.

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oo. Wastewaters. Waste that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS).

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

3.0 RESPONSIBILITIES.

3.1 NAS Key West Commanding Officer:

a. Retains ultimate responsibility for the environmental compliance and readiness of the installation including implementation of this HWMP.

b. Budgets, funds, and manages HW in full compliance with applicable substantive and procedural Federal, State, and Local HW laws and regulations.

c. Designates in writing the person(s) authorized to sign hazardous waste manifests. Enclosure (1) is a list of the personnel authorized to sign HW manifests.

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

3.2 NAS Key West Public Works Officer:

a. Ensures environmental compliance and stewardship.

b. Monitors performance through metrics (e.g. Environmental Management Systems (EMS) implementation).

c. Ensures environmental issues, especially those with the potential for a Notice of Violation (NOV), are communicated to the Installation Commanding Officer.

d. Obtains required Environmental Training through CECOS per OPNAVINST 5090.1C Appendix P.

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e. Supports the Installation Environmental Program Director (IEPD) who provides direction for environmental management to all departments and tenant commands.

f. Ensures vehicles are available to transport HW within the physical boundaries of the installation and offsite locations.

3.3 NAS Key West Installation Environmental Program Director:

a. Serves as the principal advisor to the Commanding Officer on environmental compliance matters including HW management.

b. Serves as the single point of contact for all inquiries, inspections, and other events or interactions with federal, state, and local environmental regulatory agencies.

c. Oversees installation departments, tenants and service providers operations to ensure compliance with federal, state, and local environmental regulations.

d. Serves as the Planning, Programming, Budget, and Execution System (EPR Web) interface for installation environmental program requirements. This includes coordination, identification, and submission of environmental program requirements and the management of environmental funding.

e. Maintains an EMS that continually improves environmental quality and is consistent with regional and local objectives and targets.

f. Coordinates with the Fire Department and Tenant Commands the development of spill response procedures in accordance with the contingency plan as needed.

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

h. Ensures reports and compliance documents are complete and submitted to the appropriate federal, state, and local regulatory agencies and Navy activities in a timely manner.

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i. Performs long-range planning for HW reduction, recycling, and reclamation when practical.

3.4 NAS Key West Hazardous Waste Manager:

a. Serves as the installation's technical expert in the fields of hazardous waste management. Designs hazardous waste management strategies and plans, develops, organizes, administers, evaluates, and coordinates the hazardous waste program for all areas of NAS Key West.

b. Ensures the HWMP as well as the standard operating procedures delineating HW management are reviewed and updated as needed.

c. Implements HW program requirements including:

1. Daily operation of the Station's State permitted RCRA Subpart B, Hazardous Waste Storage.
2. Oversight and inspection of waste accumulation and storage sites.
3. Execution and maintenance of all permit documentation, hazardous waste records, biennial reports and manifests and notifications required by the RCRA permit.
4. Maintaining a list of the SAAs and less than 90-day storage areas identifying each work center that generates waste and a point of contact at each area.
5. Ensuring documentation of inspections of SAAs and less than 90-day storage areas are in accordance with regulations, this Plan, and Appendix A or Appendix B.
6. Ensures inspection records are available for review by the regulatory community.
7. Ensures all SAAs operate in accordance with this plan as found in the Standard Operating Procedure (SOP) for SAAs, Appendix A.
8. Ensures all less than 90-day HW storage area(s) operate in accordance with this plan and the SOP for less than 90-day storage areas, Appendix B.
9. Ensures waste stream determinations (WSD) are up to date and that the documentation is available for review by the regulatory community.
10. Manifest procedures are followed for manifesting waste from offsite locations to the installations
HWSF:

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- i. only personnel authorized by the Commanding Officers sign manifests, enclosure (1) is the list of personnel authorized to sign manifests.
 - ii. all manifests are completed accurately and legibly.
 - iii. ensure documentation and tracking of the waste from the point of generation to the RCRA permitted HWSF. All actions shall be clearly and accurately documented to reflect when, where and who picked up the waste and the documentation shall be available at both the generators location and the RCRA permitted HWSF.
 - iv. generators at offsite locations maintain copies of manifests for three (3) years. At the end of the three (3) years, collect and archive the manifests for the life of the installation.

- 11. Maintains manufacturer's container closure specifications for each type of container and provide a copy to the transporter when waste is transported offsite.

- 12. Ensures containers are properly labeled and have the proper hazard markings.
 - d. Develops and conducts various environmental training programs necessary to maintain compliance with federal, state and local HW regulations, including providing and documenting sufficient training for each HW Coordinator and Alternate to enable them to perform their HW management duties in compliance with regulations.

 - e. Serves as the work leader for the HW Program Hazardous Waste Handlers.

 - f. Responsible for developing planning and programming budget and establishing program priorities in support of installation mission goals and objectives for the HW Program.

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g. Responsible for preparing technical replies for Command responses to inquiries from CNO, CNI, CNRSE, Congress, federal, state and other government/private agencies.

h. Serves as a member of the NAS Key West Spill Response Team (SRT). Advises SRT on matters related to HW.

i. Shall receive the following training:

1. initial RCRA training within six months of appointment and annually thereafter.
2. initial DOT Hazardous Material training within six months of appointment and every three years thereafter.
3. initial OSHA training within six months of appointment and annually thereafter.

3.5 NAS Key West Hazardous Waste Handler:

a. Supports the HW Manager in the implementation of the HW program, including the daily operation of HWSF and oversight and inspection of waste accumulation and storage sites located on NAS Key West.

b. Shall receive the following training:

1. initial RCRA training within six months of appointment and annually thereafter.
2. initial DOT Hazardous Material training within six months of appointment and every three years thereafter.
3. initial OSHA training within six months of appointment and annually thereafter.

c. Perform HW Program requirements, including:

1. inspections of non-hazardous and hazardous waste accumulation and storage sites.
2. transporting, identifying, collecting, processing, stabilizing, neutralizing, consolidating, and/or separating nonhazardous and hazardous waste in preparation for disposal.
3. prepare HW manifests for the transportation of waste from offsite locations to the HWSF.

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4. Sign HW manifests as the generator and/or transporter in accordance with regulations.
5. Provide generators of offsite locations with the generator's copy of manifests, documenting the shipments of HW from the generator to HWSF at the time of shipment.
6. Ensure all containers are closed in accordance with the manufacturer's specifications before transporting waste from an SAA to a less than 90-day HW storage area or the HWSF.
7. Ensure required documentation is completed before transferring waste from an SAA to a less than 90-day HW storage area or the HWSF.
8. Perform and document monthly inspections of SAA's and less than 90-day storage areas.

3.6 The NAS Key West Safety Officer shall:

Coordinate actions with the IEPD during spill responses.

Inform the IEPD if environmental deficiencies are identified during safety inspections.

3.7 The NAS Key West Fire Department shall:

a. Serve as Incident Commander (IC) as delegated by the Commanding Officer until properly relieved.

b. Provide initial emergency response to HM/HW incidents and technical support.

c. Coordinate efforts to obtain emergency equipment and supplies with the IEPD.

d. Maintain spill response equipment necessary for initial response.

3.8 The Naval Supply Systems Command Fleet Logistics Center shall:

a. Maintain records of the HM issued to each activity and provide reports as requested by the IEPD.

b. Ensure that Material Safety Data Sheets (MSDS) are available to all personnel who use the HM.

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3.9 Tenant Commanding Officers/Officers-in-Charge/ Executive Officers or Equivalent Senior Leadership & Department Heads

a. Retain liability for misidentification and/or mismanagement of waste generated by or within their command.

b. Ensure personnel within their command are trained in, aware of, and comply with the provisions of this HWMP.

c. Designate in writing, using the Coordinator Appointment Letter (Enclosure 2) a HW Coordinator and Alternate if their command manages an SAA or less than 90-day HW storage area.

d. Ensure supervisors of HW Coordinators and Alternate HW Coordinators in their command complete initial HW training provided by the HW Manager within six months of designation as a supervisor, and annual refresher training thereafter, to familiarize them with the duties of the coordinator and alternates duties.

3.10 HW Coordinators and Alternates:

1. Ensure the proper management of waste in accordance with this plan generated by or within their command.

2. Complete initial HW training provided by the HW Manager within six months of designation as a coordinator or alternate, and annual refresher training thereafter, to enable them to perform their HW management duties in compliance with regulations and this HWMP.

3. Complete and document weekly inspections of SAA's and less than 90-day storage areas within their command:

1. maintain completed inspection sheets onsite for one year.

2. turn in previous years inspection sheets to the HW Manager in January of the following year.

4. Ensure only DOT approved containers are used to store waste. DOT approved containers may be pre-labeled and issued by the HW Manager.

5. Do not establish new SAAs and less than 90-Day sites without approval from the HW Manager (the list of approved SAAs

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and less than 90-day storage areas is found in Appendix A (Enclosure A-2)).

6. Inform the HW Manager of any changes in materials, work processes, or procedures that may affect HW generation before generating waste.

7. Annually, review work processes for changes, modifications, or material substitutions and inform the HW Manager of any changes.

8. Ensure the Coordinator or Alternate are present for all HW pickups by the HW Manager or Handlers.

9. Ensure containers are stored so that the labels are visible when approaching and that there is direct access to each container.

4.0 HAZARDOUS MATERIAL MANAGEMENT PROCEDURES.

An extensive effort shall be made to determine if a hazardous material (HM) is usable before it may be disposed of as a waste. To minimize waste generation, utilize good inventory practices (e.g., use older material first, check expiration dates, order only what is required, and purchase less toxic or non-HM when possible).

Excess HM in good condition with a legible label shall be turned into to the HAZMIN Center.

Contact the HW Manager or HW Handlers for assistance with excess HM that are not acceptable for turn in to the HAZMIN Center.

5.0 GENERAL HAZARDOUS WASTE MANAGEMENT.

5.1 Waste Segregation:

Proper waste segregation is mandatory. Segregation prevents incompatible chemicals from mixing that have the potential to produce heat, pressure, fires, explosions, violent reactions, toxic dusts, mists and irritating or toxic fumes or gases. While safety is the main concern, improper mixing may render the subsequent mixture difficult to identify and expensive to dispose.

6.0 WASTE STREAM DETERMINATIONS (WSD).

A WSD characterizes a waste as a HW, UW, non-RCRA (non-regulated) waste, or Used Oil and identifies individual hazardous components and characteristics including Underlying Hazardous Constituents.

7.0 SATELLITE ACCUMULATION AREAS (SAA).

Appendix A is the Standard Operating Procedure (SOP) that shall be used at all SAA's to ensure the proper management of HW, UW, and other regulated waste in the SAA.

8.0 LESS THAN 90-DAY STORAGE AREAS.

Appendix B is the SOP that shall be used at all less than 90-day storage areas to ensure the proper management of HW, UW and other regulated waste in the less than 90-day storage area.

9.0 CONTRACTOR HAZARDOUS WASTE.

Appendix C is the SOP that shall be used by all contractors operating on NASKW to ensure the proper management of HW, UW, and other regulated waste on NAS Key West.

10.0 USED OIL MANAGEMENT.

Appendix D is the SOP that shall be used to ensure the proper management of Used Oil on NAS Key West.

11.0 UNIVERSAL WASTE (UW).

Appendix E is the SOP that shall be used when managing UW on NAS Key West to ensure the proper management of UW including batteries, fluorescent lamps, some pesticides, and mercury-containing equipment.

12.0 WASTE MILITARY MUNITIONS (WMM).

Appendix F is the SOP that shall be used when managing WMM on NAS Key West to ensure the proper management of.

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Hazardous Waste Management Plan

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Enclosure (1)

List of Personnel Authorized To Sign Manifests

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Personnel authorized in writing by the Commanding Officer of NAS Key West to sign manifests.

Edward Barham
Vincent Sucameli
Eric Gaertner
Frank Veliz

Naval Air Station Key West
Hazardous Waste Management Plan

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DEPARTMENT OF THE NAVY

NAVAL AIR STATION
PO BOX 9001
KEY WEST FL 33040-9001

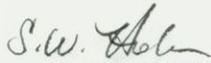
5090
PRKW4
11 Jun 09

From: Commanding Officer, Naval Air Station, Key West
To: Mr. Edward M. Barham, Civilian

Subj: DESIGNATION AS HAZARDOUS WASTE OFFICAL AUTHORIZED TO
SIGN HAZARDOUS WASTE MANIFESTS

Ref: (a) 40 C.F.R. Part 262
(b) OPNAVINST 5090.1C
(c) NASKWINST 5090.2B

1. Having fulfilled the requirements as set forth in references (a) through (c), you are hereby designated as a Naval Air Station, Key West Hazardous Waste Official, and are authorized to sign hazardous waste manifests and other documents relating to the Installation's Hazardous Waste Management Program.
2. You are directed to familiarize yourself with all applicable references to properly perform your duties.
3. This designation shall remain in effect until your detachment from this command or by written notification, whichever occurs first.


S. W. HOLMES



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
PO BOX 9001
KEY WEST FL 33040-9001

5090
Ser PR74/064
23 Feb 10

From: Commanding Officer, Naval Air Station, Key West
To: Mr. Vincent Sucameli, Civilian

Subj: DESIGNATION AS HAZARDOUS WASTE OFFICIAL AUTHORIZED
TO SIGN HAZARDOUS WASTE MANIFESTS

Ref: (a) 40 C.F.R. Part 262
(b) OPNAVINST 5090.1C
(c) NASKWINST 5090.2B

1. Having fulfilled the requirements as set forth in references (a) through (c), you are hereby designated as a Hazardous Waste Official. You are authorized to sign hazardous waste manifests and other documents relating to the Hazardous Waste Management Program at Naval Air Station, Key West.
2. You are directed to familiarize yourself with all pertinent references to properly perform your duties.
3. This designation shall remain in effect until your detachment from this command or by written notification, whichever occurs first.

S.W. Holmes
S. W. HOLMES



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
PO BOX 9001
KEY WEST, FL 33040-9001

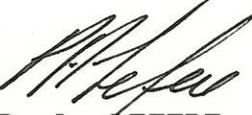
5090
Ser PR74/ 345
18 Jul 11

From: Commanding Officer, Naval Air Station, Key West
To: Mr. Eric Gaertner, Civilian

Subj: DESIGNATION AS HAZARDOUS WASTE OFFICIAL AUTHORIZED
TO SIGN HAZARDOUS WASTE MANIFESTS

Ref: (a) 40 C.F.R. Part 262
(b) OPNAVINST 5090.1C
(c) NASKWINST 5090.2B

1. Per references (a) through (c), you are hereby designated as a Hazardous Waste Official. You are authorized to sign hazardous waste manifests and other documents relating to the Hazardous Waste Management Program at Naval Air Station, Key West.
2. You are directed to familiarize yourself with all applicable references to properly perform your duties.
3. This designation shall remain in effect until your detachment from this command or by written notification, whichever occurs first.


P. A. LEFERE



DEPARTMENT OF THE NAVY

NAVAL AIR STATION
PO BOX 9001
KEY WEST, FL 33040-9001

5090
Ser PR74/ 344
18 Jul 11

From: Commanding Officer, Naval Air Station, Key West
To: Mr. Frank Veliz, Civilian

Subj: DESIGNATION AS HAZARDOUS WASTE OFFICIAL AUTHORIZED
TO SIGN HAZARDOUS WASTE MANIFESTS

Ref: (a) 40 C.F.R. Part 262
(b) OPNAVINST 5090.1C
(c) NASKWINST 5090.2B

1. Per references (a) through (c), you are hereby designated as a Hazardous Waste Official. You are authorized to sign hazardous waste manifests and other documents relating to the Hazardous Waste Management Program at Naval Air Station, Key West.
2. You are directed to familiarize yourself with all applicable references to properly perform your duties.
3. This designation shall remain in effect until your detachment from this command or by written notification, whichever occurs first.

A handwritten signature in black ink, appearing to read "P. A. Lefere", is positioned above the printed name.

P. A. LEFERE

Naval Air Station Key West
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Enclosure (2)

Coordinator Appointment Letter

Naval Air Station Key West
Hazardous Waste Management Plan

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Naval Air Station
Key West, FL

Date _____

From: _____ (Work Center Supervisor)
To: _____ (Primary HazWaste Coordinator)
_____ (Alternate HazWaste Coordinator)

Subj: HAZARDOUS WASTE COORDINATOR LETTER OF DESIGNATION

Ref: (a) NASKWINST 5090.2C

1. You are hereby designated the billet of Hazardous Waste Coordinator (or the alternate) for _____ as per reference (a)
2. You will successfully complete the Hazardous Waste Coordinator Course and have records of completion on site within three months of subject designation. You will also complete an annual review of the initial training.
3. As outlined in reference (a), your duties and skills include, but are not limited to:
 - a. You or the alternate will ensure that all hazardous waste is turned in to you at building _____.
 - b. You and your alternate will be the only persons authorized to handle hazardous waste.
 - c. You will maintain necessary records, inspection reports, and other pertinent paperwork for a minimum of three years.
 - d. You will ensure that hazardous waste are not mixed or stored improperly.
 - e. You will ensure that hazardous waste generated each workday is placed in the properly labeled container and entered into the storage record.
4. Your training record along with this job description must be kept at your work center as a permanent record.

WORK CENTER SUPERVISOR

ACKNOWLEDGEMENT ENDORSEMENT:

DATE: _____

1. I have read and understand the duties as assigned.

PRIMARY SIGNATURE

ALTERNATE SIGNATURE

Print Name _____

Print Name _____

Phone Number _____

Phone Number _____

E-Mail _____

E-Mail _____

Naval Air Station Key West
Hazardous Waste Management Plan

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APPENDIX A

Naval Air Station Key West
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**NAS Key West Hazardous Waste Management Plan
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3.2.2 Compatible Waste	A-4
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Enclosures

- A-1 Hazardous Waste Unit Coordinator Appointment Letter
- A-2 List of Satellite Accumulation Areas
- A-3 Satellite Accumulation Area Inspection Sheet
- A-4 Waste Container Log
- A-5 Labels

**NAS Key West Hazardous Waste Management Plan
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1.0 PURPOSE.

The purpose of this Standard Operating Procedure (SOP) is to establish procedures for the proper management of waste in the Satellite Accumulation Areas (SAAs).

Federal and Florida regulations strictly prohibited the disposal of waste into any wastewater treatment system, storm drain, surface waters, or upon the land.

2.0 RESPONSIBILITIES.

2.1 HW Coordinators and Alternates shall:

a. Be familiar with the HWMP and this SOP and manage waste accordingly.

b. Ensure a copy of your executed Coordinator Appointment Letter is provided to the NAS Key West Hazardous Waste Program Manager (HW Manager). Enclosure (A-1) is an example of a letter.

c. Complete initial RCRA training that includes HW packaging, labeling, handling, documentation, transportation, and turn-in procedures. This training is provided by the HW Manager.

d. Complete annual refresher training after the initial training. This training is provided by the HW Manager.

e. Maintain only SAA's approved by the HW Manager. Enclosure (A-2) is a list of approved SAAs.

f. Ensure work center personnel comply with the requirements of this SOP.

g. Annually review work processes and materials and inform the HW Manager of any changes.

h. Schedule delivery of containers and HW pickups.

i. Ensure personnel are familiar with any special management/procedures for wastes generated in their work centers.

j. Provide process information, such as MSDS, as requested.

**NAS Key West Hazardous Waste Management Plan
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k. Train personnel to respond to small spills/leaks and assist with clean-up of small spills.

l. Contact NAS Key West Fire Department (305-293-3333) when spills, leaks, or an emergency occur.

m. Conduct and document weekly inspections of the SAAs using the Inspection Sheet found in Enclosure (A-3).

n. Correct all discrepancies identified during any inspection.

o. Maintain a Container Log, Enclosure (A-4) that documents the contents of each container.

p. Ensure containers are properly labeled.

2.2 Work Center Personnel shall:

a. Use HM carefully and sparingly.

b. Be aware of procedures for handling leaking or damaged containers.

c. Collect and immediately containerize waste.

d. Keep containers closed except when adding waste.

e. Properly segregate waste.

f. Use only DOT approved containers to store waste.

g. Properly manage used oil and used oil filters.

h. Ensure good housekeeping of the shops and SAAs.

3.0 SATELLITE ACCUMULATION AREA WASTE MANAGEMENT.

SAAs are initial accumulation areas at or near the point of generation, under the control of the operator generating the waste and where less than 55 gallons of HW or 1 quart of acute HW is accumulated at any one time. The 55-gallon limit includes all HW but does not include Universal, non-regulated, or non-RCRA regulated waste, and Used Oil.

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a. Generators may have more than one SAA; however, each individual SAA shall be approved, have a unique identification number and signage posted that clearly delineates the area as a SAA.

b. HW Segregation in the SAA is mandatory. Proper segregation prevents incompatible chemicals from mixing that could produce heat, pressure, fire, explosions, violent reactions, toxic dusts, mists and irritating or toxic fumes or gases.

c. Each container in the SAA must have a container log (Enclosure A-4).

d. SAAs must be managed utilizing good housekeeping practices at all times.

3.1 Container Management:

Containers shall be in good condition (only minor surface rust or dents allowed) and compatible with the waste stored in them.

a. The HW Manager will provide approved containers.

b. Containers shall be properly closed and sealed except when adding waste. Drums with rings shall have the ring positioned with the bolt down and tightened.

c. Containers that cannot be properly sealed shall:

(1) Have the contents transferred to a proportionally sized container, **or**

(2) With guidance from the HW Manager, over-packed into an appropriate size container.

d. There shall be no evidence of spills on the outside of containers or lids (i.e. no liquids stains, or paint spills, or blast dust on the outside of the container or the lid).

Limit the number of empty unused containers in the site to what is required for spill cleanup. All Empty drums/containers shall be marked "EMPTY" to indicate they are empty.

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3.2 Waste Segregation:

The list below provides some but not all general compatibility guidance.

3.2.1 Incompatible Waste.

Do not mix incompatible wastes:

- a. Do **not** place containers of unmixed two-part epoxy in the same container.
- b. Do **not** mix organic materials with corrosives.
- c. Do **not** mix acids with bases.
- d. Do **not** mix two different types of acids in the same container.
- e. Do **not** mix paints with strippers.
- f. Do **not** mix solids and liquids in the same container.
- g. Do **not** mix paint debris (rags, brushes, rollers, etc.) with liquid paint.

Do **not** mix materials where uncertainty exists. Contact the HW Manager for assistance.

3.2.2 Compatible Waste.

A list of waste that may be mixed:

- a. Do **combine** like wastes where possible. Like waste means HM with the same National Stock Number, Material Safety Data Sheet (MSDS) number, or generated by the same process such as solid paint debris.
- b. Do **combine** small containers of the same material into a larger container. The HW Manager will provide direction to identify what may be combined.

Do call the HW Manager for assistance before combining materials if in doubt.

3.2.3 Container Logs.

Document the contents of each container using the container log (Enclosure (A-4)) at the time the waste is added to the container.

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Note: If waste is inadvertently mixed in the wrong containers immediately notify the HW Manager.

3.3 Container Labeling:

Complete each label using indelible ink (i.e., Sharpie fine point marker).

3.3.1 Hazardous Waste Labels.

All HW containers shall be labeled with a preprinted HW label with the required warnings (example shown in Enclosure (A-5)) and the following information shall be annotated on each label.

- a. Name: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West**
- d. State: **Florida**
- e. Zip: **33040**
- f. EPA ID Number: Provided by HW Manager

Additional specific information for each waste stream is found on the Waste Stream Determination Form (also called Waste Identification Documents (WID)) provided by the HW Manager including:

- a. The Proper DOT shipping name (See WSD/WID).
- b. The USEPA Waste Codes (See WSD/WID).

If for any reason a label is not available, the minimum information required to be on all HW containers before waste is added:

- a. The words "**Hazardous Waste**".
- b. The type of waste in the container.

3.3.2 Universal Waste Labels.

Label all UW containers as shown in Enclosure (A-5):

- a. Shipper: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West, Florida 33040**
- d. Contents: Identify the contents of the container.
- e. Proper DOT shipping name: See WSD/WID.

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-
- f. The Accumulation Start Date: Date the first item was added to the container.

Caution: Failure to date an UW container is a violation that may result in fines and/or penalties.

Safety Note: Ensure batteries are segregated and containerized by type: Lithium, Magnesium, Mercury and Nickel Cadmium and that all safety requirements for each type of battery are met (i.e. tape both terminals (ends) and/or bag each individual battery).

Batteries will not be picked up if the safety requirements are not completed.

3.3.3 Non-Regulated (Non-RCRA Regulated) Labels.

Label all Non-RCRA regulated waste containers as shown in Enclosure (A-5):

- a. Shipper: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West, Florida 33040**
- d. Contents: Identify the contents of the container.
- e. Proper DOT shipping name: See WSD/WID.

3.3.4 Used Oil Labels.

Used oil containers shall be labeled with

- a. The words **"Used Oil"**.

Note: All containers, buckets, pans, etc used to collect/store Used Oil must be labeled.

3.3.5 Unknown Waste Labels.

Label all unknown waste containers with:

- a. The words **"Hazardous Waste, Pending Analysis"**.
- b. The type of waste in the container (i.e., blast media, paint).
- c. Annotate the date the waste was found.

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3.4 Unknown Hazardous Material:

Notify the HW Manager immediately when an unknown HM is discovered. An extensive effort shall be made to identify any unknown HM before it is picked up for disposal.

4.0 WASTE TURN-IN.

When the 55-gallon SAA limit is reached or a container is full, **whichever occurs first**, contact your HW Coordinator or the HW Manager or HW Handler to schedule the pickup of the waste.

Regulations prohibit the transfer of waste from one SAA to another SAA.

4.1 Waste Turn-In Time Requirements:

Full containers and/or HW exceeding the 55-gallon limit shall be transferred from the SAA to a less than 90-day storage area or the HWSF within three (3) calendar days. If arrangements cannot be made, contact the HW Manager immediately.

4.2 Waste Turn-In Documentation:

No paper work is required to transfer waste to a less than 90 day storage area or the HWSF.

5.0 EMPTY HM CONTAINERS.

A HM container is empty only after pouring, pumping, and/or scraping the material in the container as defined below:

a. To the maximum extent possible, pour all liquid HM into a properly labeled HW container. Do not allow liquids to dry in their original container.

b. Place any rags used to wipe out containers in the appropriate waste container for solids.

c. If dry or harden HM is discovered in a container, scrape the harden material out and place the harden HM in a properly labeled container for solids or place the entire container of completely cured material in a properly labeled container.

Once the HM container is emptied and confirmed empty by the hazardous waste coordinator or alternate, the container shall be

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returned to CHRIMP or properly disposed of in coordination with the HW Manager.

Special note: Empty aerosol cans are **NOT** empty HM containers, they are HW.

5.1 Aerosol Can Management:

Once an aerosol can is determined to be unusable or a waste, immediately place it in a container properly labeled as HW.

6.0 INSPECTIONS.

The HW Coordinator or Alternate shall inspect each of their SAAs weekly and document that inspection on the SAA inspection sheet (Enclosure (A-3)).

a. Correct all discrepancies identified during inspections not later than the close of business the day the discrepancies was discovered. If a discrepancy cannot be resolved by the close of business notify the HW Manager immediately.

b. The inspection sheets shall be maintained for one year, in January of the following year the inspection sheets shall be turned into the HW Manager.

7.0 SPILLS AND RELEASES.

In the event of a spill, without endangering their own safety, only trained personnel shall attempt to stop and contain the spill following the procedures set forth in the site specific contingency plan.

Immediately report all spills to the NAS Key West Fire Department at (305) 293 3333.

NAS Key West Hazardous Waste Management Plan
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Enclosure (A-1)

Coordinator Appointment Letter

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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Naval Air Station
Key West, FL

Date _____

From: _____ (Work Center Supervisor)
To: _____ (Primary HazWaste Coordinator)
_____ (Alternate HazWaste Coordinator)

Subj: HAZARDOUS WASTE COORDINATOR LETTER OF DESIGNATION

Ref: (a) NASKWINST 5090.2C

1. You are hereby designated the billet of Hazardous Waste Coordinator (or the alternate) for _____ as per reference (a)
2. You will successfully complete the Hazardous Waste Coordinator Course and have records of completion on site within three months of subject designation. You will also complete an annual review of the initial training.
3. As outlined in reference (a), your duties and skills include, but are not limited to:
 - a. You or the alternate will ensure that all hazardous waste is turned in to you at building _____.
 - b. You and your alternate will be the only persons authorized to handle hazardous waste.
 - c. You will maintain necessary records, inspection reports, and other pertinent paperwork for a minimum of three years.
 - d. You will ensure that hazardous waste are not mixed or stored improperly.
 - e. You will ensure that hazardous waste generated each workday is placed in the properly labeled container and entered into the storage record.
4. Your training record along with this job description must be kept at your work center as a permanent record.

WORK CENTER SUPERVISOR

ACKNOWLEDGEMENT ENDORSEMENT:

DATE: _____

1. I have read and understand the duties as assigned.

PRIMARY SIGNATURE

ALTERNATE SIGNATURE

Print Name _____

Print Name _____

Phone Number _____

Phone Number _____

E-Mail _____

E-Mail _____

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Hazardous Waste Management Plan

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Enclosure (A-2)

Approved Hazardous Waste SAA, Less Than 90 Day,
UW & POL Storage Areas

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Hazardous Waste Management Plan

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NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS DEPARTMENT (ENVIRONMENTAL)	
RCRA Part B HW Storage Facility	Boca Chica - Bldg A-4078
Less Than 90 Day Site	Boca Chica - Bldg A-824
SAA-1	Boca Chica - Bldg A-824
SAA-2A	Boca Chica - Bldg A-824
SAA-2B	Boca Chica - Bldg A-824
SAA-3	Boca Chica - Bldg A-824
SAA-4	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824 Outside
PORT OPERATIONS DEPARTMENT	
SAA-1	Truman Annex - Bldg 289 Inside Middle Bay
POL Area	Truman Annex - Bldg 289 Inside Middle Bay
VFC-111	
Less Than 90 Day Site	Boca Chica Bldg A-4161 Cage #9 & 10
POL Area	Boca Chica Bldg A-4161 Cage #9 & 10
SAA 1	Hanger A-936
SAA 2	Hanger A-936
VFA-106 DET KEY WEST	
POL Area	Boca Chica Bldg A-4161 Cage #7 & 8
POL Area	Hanger A-936
Universal Waste Area	Hanger A-936
NAVY RESEARCH LAB (NRL)	
Less Than 90 Day Site	Fleming Key Bldg F-1 Outside
SAA 1	Fleming Key Bldg F-1 Rm 107
SAA 2	Fleming Key Bldg F-1 Rm 108
SAA 1	Fleming Key Bldg F-14
ATLANTIC TARGETS & MARINE OPERATIONS (ATMO/NAVAIR)	
Outside 90 Day	Trumbo Point Bldg B-27 CG Outside
POL Area	Trumbo Point Bldg B-27 CG
SAA	Trumbo Point Bldg B-27 CG Rm 110-B
Parts Washer	Trumbo Point Bldg B-27 CG
ARMY SPECIAL FORCES	

NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
SAA	Fleming Key Bldg KW-600
Parts Washer	Fleming Key Bldg KW-600
POL Area	Fleming Key Bldg KW-600
AIR OPS (OMD)	
SAA	Boca Chica Bldg A-331
POL Site	Boca Chica Bldg A-331 Outside
AIR OPS (Arresting Gear)	
SAA	Boca Chica Bldg A-128 Outside
POL Site	Boca Chica Bldg A-128 Outside
AIR OPS (Fleet Liaison)	
POL Site	Boca Chica Bldg A-4061 Cage A-4161
HAZMIN CENTER (CHIMP)	
Less Than 90 Day Site	Boca Chica Bldg A-931
POL Site	Boca Chica Bldg A-931
FLEET READINESS CENTER (FRC) Hdqts	
SAA NDI	Boca Chica Bldg A-980 RM 138
SAA Tire Shop	Boca Chica Bldg A-980 RM 123
SAA Oil Lab	Boca Chica Bldg A-980 RM 112
POL Area	Boca Chica Bldg A-980 Outside
FRC (Corrosion Control)	
Less Than 90 Day Site (Inactive)	Boca Chica Bldg A-990 Outside
SAA (Blast Booth)	Boca Chica Bldg A-987
SAA (Paint Booth)	Boca Chica Bldg A-990
FRC (Gound Support Equipment)	
POL Site	Boca Chica Bldg A-986 Outside
Parts Washer	Boca Chica Bldg A-986
Auto Hobby Shop	
POL Site	Boca Chica Bldg A-730 Outside
Parts Washer	Boca Chica Bldg A-730
SAA	Boca Chica Bldg A-730
NAVY MUNITIONS COMMAND (Weapons)	
POL Site	Boca Chica Bldg A-1115
Parts Washer	Boca Chica Bldg A-1115
PUBLIC WORKS (Heavy Equipment/Maintenace)	
POL Site	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438

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COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS (Metal Trade/Maintenace)	
SAA	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438
PHOENIX AIR (Aeromarti)	
POL Site	Boca Chica Bldg A-129 Outside
SIGSBEE MARINA	
SAA	Sigsbee Annex Bldg V-400
POL Site	Sigsbee Annex Bldg V-400 Outside
NAVAL BRANCH HEALTH CLINIC	
SAA	NBHC Bldg L-48 Dental Lab
SAA	NBHC Bldg L-48 Pharmacy
SAA	NBHC Bldg L-48 Immunization Lab
UW Site	NBHC Bldg L-48
AIR FORCE (Aerostat Site)	
SAA	Cudjoe Key, Bldg 12923/12926
JOINT INTERAGENCY TASK FORCE SOUTH (JIATFS)	
UW Site	Truman Annex Bldg 289
HAWTHORNE FUELS	
POL Site	Boca Chica Bldg A-935

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NAS Key West Hazardous Waste Management Plan
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Enclosure (A-3)

SAA Inspection Form

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**NAS Key West
SATELLITE INSPECTION FORM**

Command: _____ Department: _____ SAA ID: _____

HW Coordinator: _____ Date: _____ Time: _____

- Has NASKW, in writing, approved this SAA? Sat Unsat
- Is the Satellite at or near the point of generation and under the control of the generator? 40 CFR 262.34 Sat Unsat N/A
- Is there less than 55 gallons of HW accumulated? 40 CFR 262.34 Sat Unsat N/A
- Is the SAA clearly identified? 40 CFR 262.34 Sat Unsat N/A
- Are the SAA physical boundaries defined 40 CFR 262.34 Sat Unsat N/A
- Are containers properly labeled (HW, Used Oil, etc.)? 40 CFR 262.34 Sat Unsat N/A
- Are containers in good condition? 40 CFR 265.171 Sat Unsat N/A
- Are containers closed? 40 CFR 265.173 Sat Unsat N/A
- Are containers stored to prevent ruptures or leaks? 40 CFR 265.173 Sat Unsat N/A
- Are Universal Waste Containers dated? 40 CFR 173.15 Sat Unsat N/A
- Are the containers closed? Sat Unsat N/A
- Are batteries separated by type? Sat Unsat N/A
- Are the battery terminals taped? Sat Unsat N/A
- Is the waste stored with compatibles? 40 CFR 265.172 Sat Unsat N/A
- Are waste determination completed for each waste? 40 CFR 262.11 Sat Unsat N/A
- Is log book correctly format and maintained? Sat Unsat N/A
- Are the personnel who handle HW trained? 40 CFR 262. Sat Unsat N/A
- Is the housekeeping in the SAA in good order? Sat Unsat N/A

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW only)

Date of oldest UW: _____ Total Gallons of HW: _____

Discrepancies: _____

Corrective Action: _____

Transfer Information: Number of Drums _____ Manifest Number _____

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____ Signature: _____ Date: _____

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Enclosure (A-4)

Container Log

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Enclosure (A-5)

Labels

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**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

MANIFEST TRACKING NO. _____ ACCUMULATION START DATE _____

EPA ID NO. _____ EPA WASTE NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WMB

LABELMASTER® (800) 621-5808 www.labelmaster.com

Base Hazardous Waste Label (Yellow)

**NON-RCRA
REGULATED
WASTE**

NON-RCRA REGULATED WASTE

THIS WASTE NOT REGULATED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY 40CFR(RCRA) BUT MAY BE SUBJECT TO DEPT. OF TRANSPORTATION REGULATIONS, (49CFR) OR STATE OR LOCAL REGULATIONS.

GENERATOR INFORMATION:

SHIPPER: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PROPER D.O.T. SHIPPING NAME: _____

UN OR NA NO.: _____

PHONE: _____

BWM7 LABELMASTER® (800) 621-5808 www.labelmaster.com

Non-RCRA Regulated Label

USED OIL

USED OIL

GENERATOR INFORMATION

COMPANY _____

ADDRESS _____

CITY/STATE/ZIP _____

SOURCE _____

CONTACT _____

SWMV LABELMASTER® (800) 621-5808 www.labelmaster.com

Used Oil Label

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

Lab Safety Supply Inc.

Reorder No. 42109

Universal Waste Label

Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Areas
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APPENDIX B

Naval Air Station Key West
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**Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Areas
Standard Operating Procedure**

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**Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Areas
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1.0 PURPOSE.

The purpose of this Standard Operating Procedure (SOP) is to establish procedures for the proper management of waste in less than 90-day storage areas.

Federal and Florida regulations strictly prohibited the disposal of waste into any wastewater treatment system, storm drain, surface waters, or upon the land.

2.0 RESPONSIBILITIES.

2.1 Unit HW Coordinators and Alternates shall:

- a. Be familiar with this HWMP and manage waste accordingly.
- b. Ensure a copy of your executed Coordinator Appointment Letter is provided to the NAS Key West Hazardous Waste Program Manager (HW Manager). Enclosure (B-1) is an example of a letter.
- c. Complete initial RCRA training that includes HW packaging, labeling, handling, documentation, transportation, and turn-in procedures.
- d. Completed annual refresher training after the initial training.
- e. Maintain only 90-day storage areas approved by NAS Key West HW program manager. Enclosure (B-2) is a list of approved 90-Day Storage Areas.
- f. Ensure work center personnel comply with the requirements of this SOP.
- g. Annually review work processes and materials, inform NAS Key West HW Program Manager of any change, and provide MSDS, as requested.
- h. Schedule delivery of containers and HW pickups.
- i. Ensure personnel are familiar with any special management/procedures for wastes generated in their work centers.

**Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Areas
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j. Train personnel to respond to small spills/leaks and assist with clean-up of small spills.

k. Contact NAS Key West Fire Department when spills, leaks, or an emergency occur.

l. Conduct and document weekly inspections of the less than 90-day storage areas using the Inspection Sheet found in Enclosure (B-3).

m. Correct all discrepancies identified during any inspection.

n. Maintain a Container Log, Enclosure (B-4) that documents the contents of each container.

o. Ensure containers are properly labeled.

3.0 WASTE MANAGEMENT.

It is strictly prohibited to dispose of any waste into any wastewater treatment system, storm drain, surface water, or upon the land.

a. Containers shall be delivered to the less than 90-day storage area in a government / contractor owned vehicle.

b. Under **no** circumstance shall waste be placed in a private vehicle.

c. HW shall **not** be stored for more than 90 days.

3.1 Waste Received into Less Than 90-Day Storage Areas:

Waste received into a less than 90-day storage area shall be labeled and dated in accordance with Section 5 of this SOP.

The only personnel going into the site should be the coordinators or people they have trained.

3.1.1 Receipt Documentation:

No documentation is required when waste is received into the less than 90-day storage area.

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4.0 LESS THAN 90 DAY STORAGE AREA.

HW shall be accumulated for less than 90-days. This time limit does not apply to Universal Waste, non regulated (non-RCRA) waste, or Used Oil. The HW Coordinator or the Alternate of the less than 90-day areas shall:

a. Control access at all times (e.g. keep area locked except when trained personnel are present).

b. Post weather resistant signs that are clearly visible from a distance of 50 feet on all exterior sides of the area stating:

"NO SMOKING WITHIN 50 FEET"

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

**"DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"
"HAZARDOUS WASTE STORAGE AREA"**

d. Ensure sufficient aisle space (30 to 36 inches) around containers and pallets to allow the unobstructed movement of personnel for fire protection, spill response, and access to decontamination equipment.

e. Position each container so that the label is clearly visible when approaching the containers.

f. Stage the containers so there is direct access, i.e. nothing stored in front of the containers.

g. Separate incompatible waste using berms, dikes, spill pallets, or other means to prevent incompatible materials from coming into contact in the event of a spill.

h. Stack drums no more than two high; double stacking will be per pallet design and capacity but no more than four drums per pallet.

i. Position a fire extinguisher and eyewash station so that they are immediately accessible and in an area that would not be affected by a spill.

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Less Than 90-Day Hazardous Waste Storage Areas
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- (1) Inspect both the fire extinguisher and the eyewash station monthly.
- (2) Maintain the inspection sheets. These inspections are done per Fire Department and NAS Base Safety Regulations.

j. Ensure an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

k. Maintain a spill kit in an accessible area near the storage area that would not be affected by a spill and that:

- (1) Is clearly marked as "HW/HM SPILL KIT".
- (2) Contains material and equipment necessary to contain and clean up spills, i.e., non-sparking shovel and dust pan.
- (3) Contains absorbent material that is compatible with the waste stored in the less than 80-day storage area.
- (4) Is stocked with enough container(s) and label(s) to properly clean up a spill and the debris thereof.
- (5) Contains Personnel Protective Equipment (PPE) including gloves, face shields, rubber boots, etc.

l. Post the contingency plan at the less than 90-day storage area. Any modifications shall be approved by the NAS Key West HW Program Manager.

m. The contingency plan must be immediately reviewed and amended whenever:

- (1) The Emergency Coordinator changes.
- (2) There is a revision of applicable regulations.
- (3) The plan fails in an emergency.
- (4) The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

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n. In the event of a spill, only trained personnel shall attempt to stop and contain the spill without endangering their own safety.

o. Immediately report all spills to the NAS Key West Emergency Dispatch at 305 293 3333.

4.1 Waste Segregation.

The list below provides some but not all general compatibility guidance.

4.1.1 Incompatible Waste.

Do not mix incompatible wastes:

- Do **not** place containers of unmixed two-part epoxy in the same container.
- Do **not** mix organic material with corrosives.
- Do **not** mix acids with bases.
- Do **not** mix two different types of acids in the same container.
- Do **not** mix paints with strippers.
- Do **not** mix solids and liquids in the same container.
- Do **not** mix paint debris (rags, brushes, rollers, etc.) with liquid paint.

Do **not** mix materials where uncertainty exists. Contact the NASKW HW Program Manager for assistance.

4.1.2 Compatible Waste. A list of waste that may be mixed:

Do **combine** like wastes where possible. Like waste means HM with the same National Stock Number, Material Safety Data Sheet (MSDS) number, or generated by the same process such as solid paint debris.

Do **combine** small containers of the same material into a larger container. NASKW HW Program Manager will provide direction to identify what may be combined.

Do call NAS Key West HW Program Manager for assistance before combining materials if in doubt.

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4.1.3 UW Segregation.

The types of UW that may be accumulated include: batteries, lamps, mercury containing equipment, and pesticides. Guidelines for containerizing UW:

- a. Only one type of waste per container
- b. Only one type of battery per container.

4.2 Unknown Hazardous Material:

Notify the NAS Key West HW Program Manager immediately when an unknown HM is discovered. An extensive effort shall be made to identify the unknown material before it is disposed of as a waste. If the HM is determined to be a waste:

a. Store the container of unknown waste in a less than 90-day area until it is properly identified or the 90-day limit is reached; **whichever occurs first.**

b. Store away from potentially incompatible waste until properly characterized.

c. Label the container with the words "**Hazardous Waste**", "**Pending Analysis**".

d. **Annotate the date the waste was found.**

e. Once the waste determination is completed, the container may be relabeled as required.

Under no circumstances shall the date on a container be changed.

4.3 Container Logs:

Document the contents of each container using the container log (Enclosure (B-4)) at the time the waste is added to the container.

Note: If waste is inadvertently mixed in the wrong containers immediately notify the NAS Key West HW Program Manager.

Under most circumstance the mixture may be managed if the NAS Key West HW Program Manager is aware of the mixture.

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5.0 CONTAINER MANAGEMENT. All containers shall be DOT approved, in good condition (only minor rust or dents) and compatible with the material stored in them.

a. The NAS Key West HW Manager will provide approved containers.

b. Containers shall be closed at all times except when adding waste. Containers that cannot be properly close shall:

- (1) Have the contents transferred to an appropriately sized container **OR**
- (2) Be over packed in an appropriately sized container.

c. Drums with rings shall have the rings positioned with the bolt down and tight.

d. There shall be no evidence of spills on the outside of the container (i.e. no wet or stains from dried liquids or stains, evidence of spill down the sides, or blast dust on the outsides of the drums).

5.1 Empty Unused Drums:

Limit the number of empty unused containers in the site to what is required for spill cleanup. All Empty drums/containers shall be marked "EMPTY" to indicate they are empty. (i.e., used oil drum after being pumped out)

5.2 Empty HM Containers:

A HM container is empty only after pouring, pumping, and/or scraping as defined below:

a. To the maximum extent possible, pour all liquid HM into a properly labeled HW container. Do not allow liquids to dry in their original container.

b. Place any rags used to wipe out containers in the appropriate waste container for solids.

c. If dry or harden HM is discovered in a container, scrape the harden material out and place the harden HM in a properly

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labeled container for solids or place the entire container of completely cured material in a properly labeled container.

d. Once the HM container is emptied, take the HM container to your HW Coordinator/Alternate who will inspect the container to ensure it meets the regulatory definition of empty.

Once the HM container is emptied and confirmed empty by the hazardous waste coordinator or alternate, the container shall be returned to CHRIMP or properly disposed of in coordination with the HW Program Manager

Special note: Empty aerosol cans are **NOT** empty containers.

5.3 Aerosol Can Management:

a. Manage aerosol cans as HW.

b. Once an aerosol can is determined to be unusable, immediately place it in a properly labeled HW container. Turn the HW container of aerosol cans in as HW.

5.4 Container Labeling:

Properly complete each label using indelible ink.

5.4.1 Hazardous Waste Containers.

HW containers shall be labeled as shown in Enclosure (B-5):

The preprinted regulatory required warning

- a. Name: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West**
- d. State: **Florida**
- e. Zip: **33040**
- f. EPA ID Number: See WSD/WID.
- g. Proper DOT shipping name and description: See WSD/WID.
- h. USEPA Waste Codes: See WSD/WID.

Specific information for each waste stream is found on the Waste Stream Determination Form (also called Waste Identification Documents (WID)) provided by the NAS Key West HW Manager and includes the following information:

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- a. Proper DOT shipping name in its entirety (See WSD (WID))
- b. USEPA Waste Codes (See WSD (WID)).

If for any reason a label is not available, the minimum information required to be on all HW containers before waste is added:

- a. The words "Hazardous Waste".
- b. The type of waste in the container.
- c. The accumulation Start Date.

Caution: Failure to date a HW container in a less than 90-day storage area is a violation and could result in fines or penalties.

5.4.2 Universal Waste Containers:

Common types of UW that may be accumulated include: batteries, lamps, mercury containing equipment, and pesticides. Label UW containers as shown in Enclosure (B-4):

- a. Shipper: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West, Florida 33040**
- d. Contents. Identify the contents of the container.
- e. Proper DOT shipping name: As it appears on the WSD (WID).
- f. The Accumulation Start Date is the first item was added to the container.

Caution: Failure to date an UW container is a Violation that could result in fines and/or penalties

Safety Note: Ensure batteries are segregated and containerized by type: Lithium, Magnesium, Mercury and Nickel Cadmium and that all safety requirements for each type of battery are met (i.e. tape both terminals (ends) and / or bag each individual battery).

Batteries will not be picked up if the safety requirements are not completed.

5.4.3 Non Regulated or Non-RCRA Regulated) Containers:

Non regulated waste shall be labeled as shown in Enclosure (B-5) with:

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- a. A non-regulated/non-RCRA regulated waste.
- b. Contents shall be clearly identified on the label.

5.4.4 Used Oil Containers:

Used Oil containers shall be labeled as shown in Enclosure (B-5) with:

- a. The words "Used Oil".

Note: All containers, buckets, pans, etc used to collect/store Used Oil must be labeled with the words "Used Oil" and stored to prevent spills.

5.4.5 Unknown Waste Labels.

Unknown waste shall be labeled as HW and a "Pending Analysis" label as shown in Enclosure (B-5). Labels are available from the NAS Key West HW Manager.

5.4.6 Manifest Number.

Only NAS Key West personnel shall annotate the manifest number on any labels.

6.0 INSPECTIONS.

The less than 90-day storage area shall be inspected once a week using the inspection sheet shown in Enclosure (B-3).

a. Correct all discrepancies identified during inspections not later than the close of business the day of discovery. If a discrepancy cannot be resolved by the close of business, notify the NAS Key West HW Manager immediately.

The inspection sheet shall be retained for a minimum of one (1) year on site. In January of the following year the inspection sheets shall be turned in to the NAS Key West HW Manager.

7.0 TRANSFER OF WASTE TO PERMITTED FACILITY.

HW shall be transferred from the less than 90-day storage area to the NAS Key West's RCRA permitted HWSF or an offsite RCRA permitted HWSF within 90 days.

NAS Key West IEPD must approve, in writing, any transfer of HW to any offsite RCRA permitted HWSF.

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Note: DOT requirements for labeling, packaging, marking, and manifesting do NOT apply to HW transferred from a less than 90-day storage area aboard NAS Key West to the NAS Key West permitted HWSF.

a. The HW Coordinator or Alternate shall be present for each pickup of waste.

b. On the day of the waste pickup the HW Coordinator or Alternate shall:

- (1) Ensure the containers are staged for pickup.
- (2) Ensure containers are properly labeled.
- (3) Ensure containers are closed and ready for transport to the NAS Key West RCRA permitted HWSF.
- (4) Document the transfer of the container.

c. No paper work is required for waste transferred from a less than 90 day storage area to the NAS Key West RCRA permitted HWSF.

d. The waste shall be inspected at the time of the pickup; all discrepancies shall be immediately corrected before the waste may be picked up.

8.0 CONTANGANCY PLAN.

a. Building A-824 (Environmental Warehouse). The contingency plan for the less than 90-day Storage Area in Building A-824 is found in Enclosure (B-6).

b. Building A-931 (HAZMIN Center). The contingency plan for the less than 90-day storage area is found in Enclosure (B-7).

c. Building A-4161 Cage #10 (VFC-111). The contingency plan for the less than 90-day storage area is found in Enclosure (B-8).

d. Building B-27 (NAVAIR). The contingency plan for the less than 90-day storage area is found in Enclosure (B-9).

e. Building F-1 (NRL). The contingency plan for the less than 90-day storage area is found in Enclosure (B-10).

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9.0 SPILLS AND RELEASES.

In the event of a spill, without endangering their own safety, only trained personnel shall attempt to stop and contain the spill following the procedures set forth in the site specific contingency plan.

Immediately report all spills to the NAS Key West Fire Department at (305) 293 3333.

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Enclosure (B-1)

Coordinator Appointment Letter

Naval Air Station Key West
Hazardous Waste Management Plan

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Naval Air Station
Key West, FL

Date _____

From: _____ (Work Center Supervisor)
To: _____ (Primary HazWaste Coordinator)
_____ (Alternate HazWaste Coordinator)

Subj: HAZARDOUS WASTE COORDINATOR LETTER OF DESIGNATION

Ref: (a) NASKWINST 5090.2C

1. You are hereby designated the billet of Hazardous Waste Coordinator (or the alternate) for _____ as per reference (a)
2. You will successfully complete the Hazardous Waste Coordinator Course and have records of completion on site within three months of subject designation. You will also complete an annual review of the initial training.
3. As outlined in reference (a), your duties and skills include, but are not limited to:
 - a. You or the alternate will ensure that all hazardous waste is turned in to you at building _____.
 - b. You and your alternate will be the only persons authorized to handle hazardous waste.
 - c. You will maintain necessary records, inspection reports, and other pertinent paperwork for a minimum of three years.
 - d. You will ensure that hazardous waste are not mixed or stored improperly.
 - e. You will ensure that hazardous waste generated each workday is placed in the properly labeled container and entered into the storage record.
4. Your training record along with this job description must be kept at your work center as a permanent record.

WORK CENTER SUPERVISOR

ACKNOWLEDGEMENT ENDORSEMENT:

DATE: _____

1. I have read and understand the duties as assigned.

PRIMARY SIGNATURE

ALTERNATE SIGNATURE

Print Name _____

Print Name _____

Phone Number _____

Phone Number _____

E-Mail _____

E-Mail _____

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-2)

Approved Hazardous Waste SAA, Less Than 90 Day,
UW & POL Storage Areas

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS DEPARTMENT (ENVIRONMENTAL)	
RCRA Part B HW Storage Facility	Boca Chica - Bldg A-4078
Less Than 90 Day Site	Boca Chica - Bldg A-824
SAA-1	Boca Chica - Bldg A-824
SAA-2A	Boca Chica - Bldg A-824
SAA-2B	Boca Chica - Bldg A-824
SAA-3	Boca Chica - Bldg A-824
SAA-4	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824 Outside
PORT OPERATIONS DEPARTMENT	
SAA-1	Truman Annex - Bldg 289 Inside Middle Bay
POL Area	Truman Annex - Bldg 289 Inside Middle Bay
VFC-111	
Less Than 90 Day Site	Boca Chica Bldg A-4161 Cage #9 & 10
POL Area	Boca Chica Bldg A-4161 Cage #9 & 10
SAA 1	Hanger A-936
SAA 2	Hanger A-936
VFA-106 DET KEY WEST	
POL Area	Boca Chica Bldg A-4161 Cage #7 & 8
POL Area	Hanger A-936
Universal Waste Area	Hanger A-936
NAVY RESEARCH LAB (NRL)	
Less Than 90 Day Site	Fleming Key Bldg F-1 Outside
SAA 1	Fleming Key Bldg F-1 Rm 107
SAA 2	Fleming Key Bldg F-1 Rm 108
SAA 1	Fleming Key Bldg F-14
ATLANTIC TARGETS & MARINE OPERATIONS (ATMO/NAVAIR)	
Outside 90 Day	Trumbo Point Bldg B-27 CG Outside
POL Area	Trumbo Point Bldg B-27 CG
SAA	Trumbo Point Bldg B-27 CG Rm 110-B
Parts Washer	Trumbo Point Bldg B-27 CG
ARMY SPECIAL FORCES	

NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
SAA	Fleming Key Bldg KW-600
Parts Washer	Fleming Key Bldg KW-600
POL Area	Fleming Key Bldg KW-600
AIR OPS (OMD)	
SAA	Boca Chica Bldg A-331
POL Site	Boca Chica Bldg A-331 Outside
AIR OPS (Arresting Gear)	
SAA	Boca Chica Bldg A-128 Outside
POL Site	Boca Chica Bldg A-128 Outside
AIR OPS (Fleet Liaison)	
POL Site	Boca Chica Bldg A-4061 Cage A-4161
HAZMIN CENTER (CHIMP)	
Less Than 90 Day Site	Boca Chica Bldg A-931
POL Site	Boca Chica Bldg A-931
FLEET READINESS CENTER (FRC) Hdqts	
SAA NDI	Boca Chica Bldg A-980 RM 138
SAA Tire Shop	Boca Chica Bldg A-980 RM 123
SAA Oil Lab	Boca Chica Bldg A-980 RM 112
POL Area	Boca Chica Bldg A-980 Outside
FRC (Corrosion Control)	
Less Than 90 Day Site (Inactive)	Boca Chica Bldg A-990 Outside
SAA (Blast Booth)	Boca Chica Bldg A-987
SAA (Paint Booth)	Boca Chica Bldg A-990
FRC (Gound Support Equipment)	
POL Site	Boca Chica Bldg A-986 Outside
Parts Washer	Boca Chica Bldg A-986
Auto Hobby Shop	
POL Site	Boca Chica Bldg A-730 Outside
Parts Washer	Boca Chica Bldg A-730
SAA	Boca Chica Bldg A-730
NAVY MUNITIONS COMMAND (Weapons)	
POL Site	Boca Chica Bldg A-1115
Parts Washer	Boca Chica Bldg A-1115
PUBLIC WORKS (Heavy Equipment/Maintenace)	
POL Site	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438

NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS (Metal Trade/Maintenace)	
SAA	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438
PHOENIX AIR (Aeromarti)	
POL Site	Boca Chica Bldg A-129 Outside
SIGSBEE MARINA	
SAA	Sigsbee Annex Bldg V-400
POL Site	Sigsbee Annex Bldg V-400 Outside
NAVAL BRANCH HEALTH CLINIC	
SAA	NBHC Bldg L-48 Dental Lab
SAA	NBHC Bldg L-48 Pharmacy
SAA	NBHC Bldg L-48 Immunization Lab
UW Site	NBHC Bldg L-48
AIR FORCE (Aerostat Site)	
SAA	Cudjoe Key, Bldg 12923/12926
JOINT INTERAGENCY TASK FORCE SOUTH (JIATFS)	
UW Site	Truman Annex Bldg 289
HAWTHORNE FUELS	
POL Site	Boca Chica Bldg A-935

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-3)

90-Day Inspection Form

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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**NAS Key West
90-DAY ACCUMULATION AREA INSPECTION FORM**

Command: _____ **Department:** _____ **Site ID:** _____

HW Coordinator: _____ **Date:** _____ **Time:** _____

Are containers properly labeled HW/UW/Used Oil?	40 CFR 262.34	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are HW / UW containers dated?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the Contingency Plan posted?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are "No Smoking", "Danger" and "HW Storage" signs posted?	40 CFR 264.17	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the area fenced in, locked and bermed to prevent the release of HW?	40 CFR 265.31	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is fire equipment available and maintained?	40 CFR 265.32	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is a spill kit available and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there an eye wash directly accessible?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there access to a telephone or radio for Emergency calls?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is aisle space adequate? (30"minimum)	40 CFR 265.35	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers in good condition?	40 CFR 265.171	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is waste compatible with container?	40 CFR 265.172	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers closed?	40 CFR 265.173	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers stored to prevent ruptures/leaks?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are weekly inspections documented?	40 CFR 265.174	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the waste stored with compatibles?	40 CFR 265.177	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is housekeep in good order		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is logbook in the correct format and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Number of HW Containers?	Oldest Date:	Number of UW Container?	Oldest Date:

Discrepancies: _____

Corrective Action: _____

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW)

Transfer Information: Number of Drums Manifest Number

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____ **Signature:** _____ **Date:** _____

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-4)

Container Log

Naval Air Station Key West
Hazardous Waste Management Plan

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Naval Air Station Key West
Hazardous Waste Management Plan

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-5)

Labels

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

MANIFEST TRACKING NO. _____ ACCUMULATION START DATE _____

EPA ID NO. _____ EPA WASTE NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WMB

LABELMASTER® (800) 621-5808 www.labelmaster.com

Base Hazardous Waste Label (Yellow)

**NON-RCRA
REGULATED
WASTE**

THIS WASTE NOT REGULATED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY 40CFR(RCRA) BUT MAY BE SUBJECT TO DEPT. OF TRANSPORTATION REGULATIONS, (49CFR) OR STATE OR LOCAL REGULATIONS.

GENERATOR INFORMATION:

SHEPPER: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PROPER D.O.T. SHIPPING NAME: _____

UN OR NA NO.: _____

PHONE: _____

NON-RCRA REGULATED WASTE

BWMT LABELMASTER® (800) 621-5808 www.labelmaster.com

Non-RCRA Regulated Label

USED OIL

USED OIL

GENERATOR INFORMATION

COMPANY _____

ADDRESS _____

CITY/STATE/ZIP _____

SOURCE _____

CONTACT _____

SWMV LABELMASTER® (800) 621-5808 www.labelmaster.com

Used Oil Label

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

Lab Safety Supply Inc.

Reorder No. 42109

Universal Waste Label

NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-6)

Contingency Plan
Bldg A-824

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Hazardous Waste Program
Building A-824**

June 2013

1.0 Purpose. This Contingency Plan establishes procedures to be utilized in the event of a spill at the less than 90-day storage area located in Building A-824.

1.1 Scope. The scope of this plan is limited to the initial response by personnel working at the less than 90-day storage.

If determined by the Senior Fire Official on Duty, that the spill is beyond the scope of this plan, then the NAS Key West Facilities Response Plan will be activated at the discretion of NAS Key West personnel.

2.0 SPILL PROCEDURES. Only trained personnel shall attempt to stop, contain, or cleanup a spill, and then only without endangering themselves. If a spill occurs, personnel shall:

- a. **Stop** work immediately.
- b. **Warn** others in the area.
- c. **Evacuate** untrained personnel from the area.
- d. **Identify** the material spilled, if possible.
- e. Put on **personal protective equipment (PPE)** required by the material spilled before attempting any containment or any cleanup action.
- f. **Contain** the spill using kitty litter, absorbent pads or sock booms (designed for the material spilled) to prevent it from entering a floor drain or the environment.
- g. Notify **NAS Key West Fire Department** by dialing (305) 293 3333.
- h. **Maintain adequate ventilation;** if adequate ventilation cannot be guaranteed; **evacuate** and **secure** the area until the Fire Department arrives.
- i. **Provide detailed information** and support to the Fire Department's first responders when they arrive.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Hazardous Waste Program
Building A-824**

June 2013

3.0 NOTIFICATIONS. Immediately report all spills to the NAS Key West's Fire Department by dialing (305) 293 3333.

Provide the following information:

- a. Activity's Name and phone number.
- b. Building Number and exact location within the building.
- c. Any injuries.
- d. Type of material spilled; if known.
- e. Estimated amount spilled.
- f. Any actions taken.
- g. Any potential threat or release to the environment.

The Fire Department will make all other required notifications.

4.0 EVACUATION MAP. A site evacuation map is provided as Attachment (1).

5.0 SPILL RESPONSE PREPARATIONS. Maintain this contingency plan and revisions thereof in the less than 90-day storage area. The HW Handler and all personnel working the area shall:

- a. Read and understand this contingency plan.
- b. Manage the less than 90-day storage area to prevent spills, fires, and explosions.
- c. Ensure adequate aisle space around the waste containers to allow for the unobstructed movement of personnel, fire and/or clean up equipment.
- d. Post weather resistance signs that are readily visible, that identifies:

(1) Names and phone numbers of Hazardous Waste Coordinator and Alternate.

(a) The sign must be updated if the HW Coordinator or Alternate changes.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Hazardous Waste Program
Building A-824**

June 2013

e. Post the evacuation plan where it is clearly visible.

5.1 Safety Equipment. The HW handler shall:

a. Locate a fire extinguisher that is readily available and in an area that would not be affected by a spill.

b. Position an eyewash station so there is direct access and in an area that would not be affected by a spill.

- (1) Both the fire extinguisher and the eyewash station shall be inspected monthly.
- (2) Maintain the inspections per Fire Department and Safety Department requirements.

c. Ensure there is an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

d. Ensure PPE is available, and located in an area not expected to be affected by a spill, including gloves, safety glasses, face shields, rubber aprons and boots, etc.

5.2 Spill Kit and Equipment. A spill kit and other equipment needed to respond to a spill shall be maintained as follows:

a. The spill kit shall be clearly marked as "HW/HM SPILL KIT".

- (1) It must be located in an accessible area that will not be affected by a spill.
- (2) Include material and equipment necessary to contain and clean up spills, i.e. non-sparking shovel, broom, dust pan, absorbent material (pads, socks, booms, and kitty litter) compatible with the waste.

b. Sufficient container(s) and label(s) shall be available to properly containerize the spilled material and the debris thereof.

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Hazardous Waste Program
Building A-824

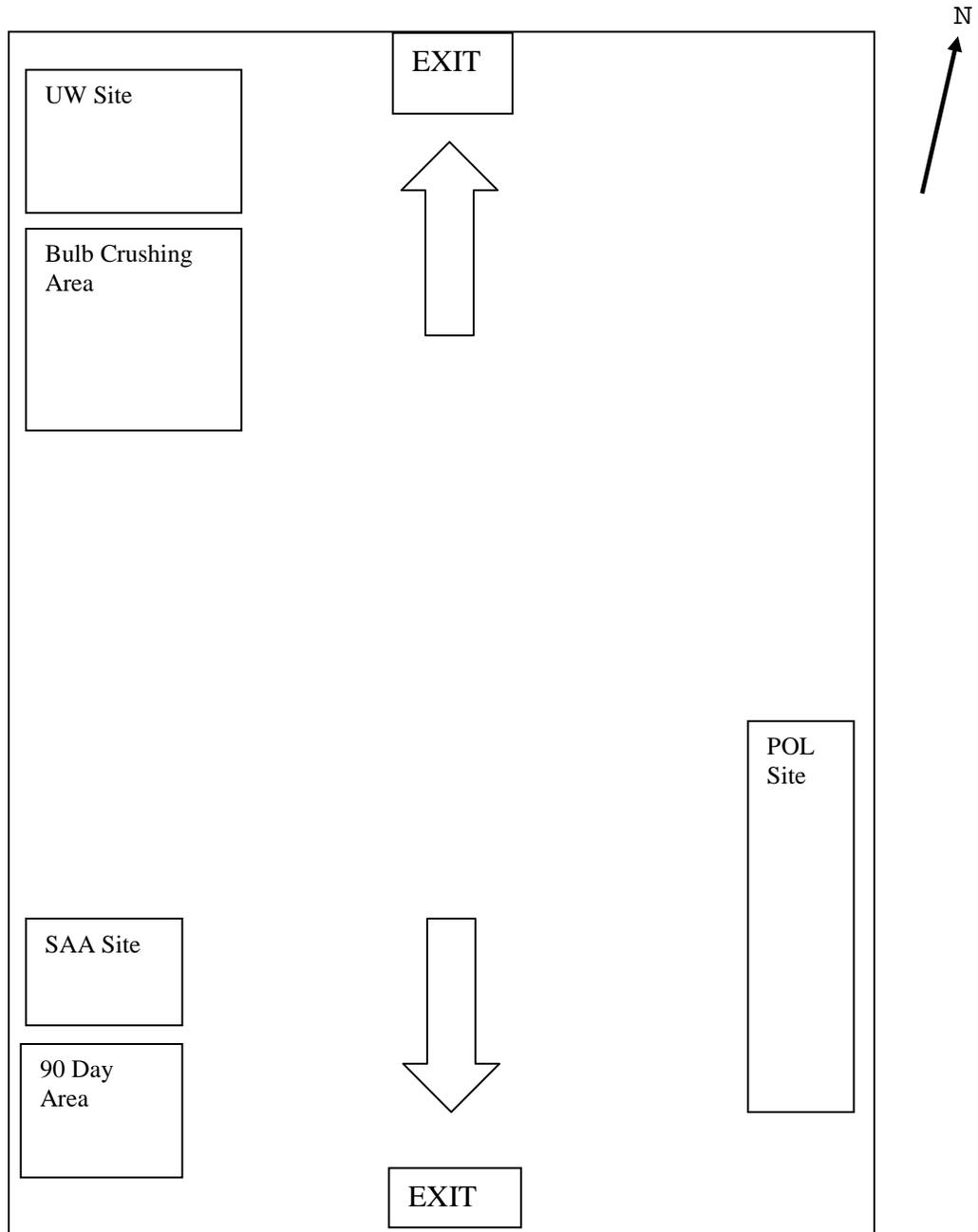
June 2013

6.0 REVIEW AND UPDATE. The contingency plan must be reviewed and amended whenever:

- a. There is a revision of applicable regulations.
- b. The plan fails in an emergency.
- c. The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Hazardous Waste Program
Building A-824

June 2013



Attachment (1)

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-7)

Contingency Plan
Bldg A-931

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Fleet Industrial Supply Center
Building A-931**

June 2013

1.0 PURPOSE. This Contingency Plan establishes procedures to be utilized in the event of a spill at the less than 90-day storage area located at Fleet Industrial Supply Center (FISC).

1.1 Scope. The scope of this plan is limited to the initial response by personnel working at the less than 90-day storage.

If determined by the Senior Fire Official on Duty, that the spill is beyond the scope of this plan, then the NAS Key West Facilities Response Plan (FRP) will be activated at the discretion of NAS Key West personnel.

2.0 SPILL PROCEDURES. Only trained personnel shall attempt to stop, contain, or cleanup a spill, and then only without endangering themselves. If a spill occurs, personnel shall:

- a. **Stop** work immediately.
- b. **Warn** others in the area.
- c. **Evacuate** untrained personnel from the area.
- d. **Identify** the material spilled, if possible.
- e. Put on **personal protective equipment (PPE)** required by the material spilled before attempting any containment or any cleanup action.
- f. **Contain** the spill using kitty litter, absorbent pads or sock booms (designed for the material spilled) to prevent it from entering a floor drain or the environment.
- g. Notify **NAS Key West Fire Department** by dialing (305) 293 3333.
- h. **Maintain adequate ventilation;** if adequate ventilation cannot be guaranteed; evacuate and **secure** the area until the Fire Department arrives.
- i. **Provide detailed information** and support to the Fire Department's first responders when they arrive.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Fleet Industrial Supply Center
Building A-931**

June 2013

3.0 NOTIFICATIONS. Immediately report a spill to the NAS Key West's Fire Department by dialing (305) 293 3333.

.

Provide the following information:

- a. Activity's Name and phone number.
- b. Building Number and exact location within the building.
- c. Any injuries.
- d. Type of material spilled; if known.
- e. Estimated amount spilled.
- f. Any actions taken.
- g. Any potential threat or release to the environment.

The Fire Department will make all other required notifications.

4.0 EVACUATION MAP. A site evacuation map is provided as Attachment (1).

5.0 SPILL RESPONSE PREPARATION. Maintain this contingency plan and revisions thereof in the less than 90-day storage area. The HW Coordinator, Alternate and all personnel working the area shall:

- a. Read and understand this contingency plan.
- b. Manage the less than 90-day storage area to prevent spills, fires, and explosions.
- c. Ensure adequate aisle space around the waste containers to allow for the unobstructed movement of personnel, fire and/or clean up equipment.
- d. Post weather resistance signs that are readily visible, that identifies:

(1) Names and phone numbers of Hazardous Waste Coordinator and Alternate.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Fleet Industrial Supply Center
Building A-931**

June 2013

(a) The sign must be updated if the HW Coordinator or Alternate changes.

e. Post the evacuation plan where it is clearly visible.

5.1 Safety Equipment. The HW Coordinator shall:

a. Locate a fire extinguisher that is readily available and in an area that would not be affected by a spill.

b. Position an eyewash station so there is direct access and in an area that would not be affected by a spill.

(1) Both the fire extinguisher and the eyewash station shall be inspected monthly.

(2) Maintain the inspections Per Fire Department and Safety Department requirements.

c. Ensure there is an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

d. Ensure PPE is available, and located in an area not expected to be affected by a spill, including gloves, safety glasses, face shields, rubber aprons and boots, etc.

5.2 Spill Kit and Equipment. A spill kit and other equipment needed to respond to a spill shall be maintained as follows:

a. The spill kit shall be clearly marked as "HW/HM SPILL KIT".

(1) It must be located in an accessible area that will not be affected by a spill.

(2) Include material and equipment necessary to contain and clean up spills, i.e. non-sparking shovel, broom, dust pan, absorbent material (pads, socks, booms, and kitty litter) compatible with the waste.

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Fleet Industrial Supply Center
Building A-931

June 2013

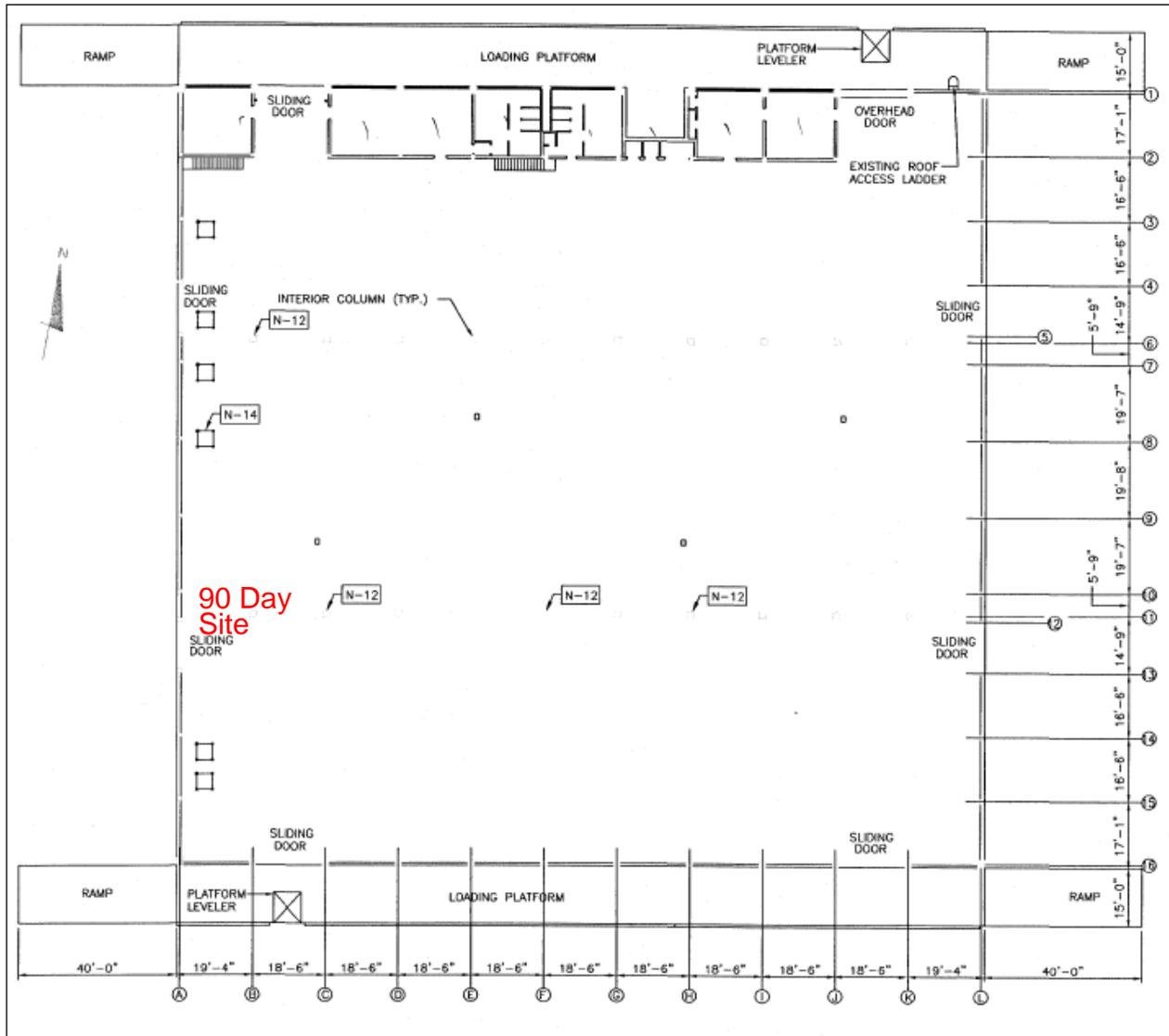
b. Sufficient container(s) and label(s) shall be available to properly containerize the spilled material and the debris thereof.

6.0 REVIEW AND UPDATE. The contingency plan must be reviewed and amended whenever:

- a. There is a revision of applicable regulations.
- b. The plan fails in an emergency.
- c. The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Fleet Industrial Supply Center
Building A-931

June 2013



Attachment (1)

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

June 2013

Enclosure (B-8)

Contingency Plan
Bldg A-4161

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
VFC-111
Building A-4161**

June 2013

1.0 PURPOSE. This Contingency Plan establishes procedures to be utilized in the event of a spill at the less than 90-day storage area located at VFC-111 less than 90 day site Bldg A-4061 cage # 10.

1.1 Scope. The scope of this plan is limited to the initial response by personnel working at the less than 90-day storage area.

If determined by the Senior Fire Official on Duty, that the spill is beyond the scope of this plan, then the NAS Key West Facilities Response Plan (FRP) will be activated at the discretion of NAS Key West personnel.

2.0 SPILL PROCEDURES. Only trained personnel shall attempt to stop, contain, or cleanup a spill, and then only without endangering themselves. If a spill occurs, personnel shall:

- a. **Stop** work immediately.
- b. **Warn** others in the area.
- c. **Evacuate** untrained personnel from the area.
- d. **Identify** the material spilled, if possible.
- e. Put on **personal protective equipment (PPE)** required by the material spilled before attempting any containment or any clean up action.
- f. **Contain** the spill using kitty litter, absorbent pads or sock booms (designed for the material spilled) to prevent it from entering a floor drain or the environment.
- g. Notify **NAS Key West Fire Department by dialing** (305) 293 3333.
- h. **Maintain adequate ventilation;** if adequate ventilation cannot be guaranteed; evacuate and **secure** the area until the Fire Department arrives.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
VFC-111
Building A-4161**

June 2013

i. **Provide detailed information** and support to the Fire Department's first responders when they arrive.

3.0 NOTIFICATIONS. Immediately report a spill to the NAS Key West Fire Department by dialing (305) 293 3333.

Provide the following information:

- a. Activity's Name and phone number.
- b. Building Number and exact location within the building.
- c. Any injuries.
- d. Type of material spilled; if known.
- e. Estimated amount spilled.
- f. Any actions taken.
- g. Any potential threat or release to the environment.

The Fire Department will make all other required notifications.

4.0 EVACUATION MAP. A site evacuation map is not required as the 90 day storage area is a locker located in Locker Bldg A-4161. Attachment (1) is a map of the site location.

5.0 SPILL RESPONSE PREPARATION. Maintain this contingency plan and revisions thereof in the less than 90-day storage area. The HW Coordinator, Alternate and all personnel working the area shall:

- a. Read and understand this contingency plan.
- b. Manage the less than 90-day storage area to prevent spills, fires, and explosions.
- c. Ensure adequate aisle space around the waste containers to allow for the unobstructed movement of personnel, fire and/or clean up equipment.
- d. Post weather resistance signs that are readily visible, that identifies:

(1) Names and phone numbers of Hazardous Waste Coordinator and Alternate.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
VFC-111
Building A-4161**

June 2013

(a) The sign must be updated if the HW Coordinator or Alternate changes.

e. Post the evacuation plan where it is clearly visible.

5.1 Safety Equipment. The HW Coordinator shall:

a. Locate a fire extinguisher that is readily available and in an area that would not be affected by a spill.

b. Position an eyewash station so there is direct access and in an area that would not be affected by a spill.

(1) Both the fire extinguisher and the eyewash station shall be inspected monthly.

(2) Maintain the inspections per Fire Department and Safety Department requirements.

c. Ensure there is an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

d. Ensure PPE is available, and located in an area not expected to be affected by a spill, including gloves, safety glasses, face shields, rubber aprons and boots, etc.

5.2 Spill Kit and Equipment. A spill kit and other equipment needed to respond to a spill shall be maintained as follows:

a. The spill kit shall be clearly marked as "HW/HM SPILL KIT".

(1) It must be located in an accessible area that will not be affected by a spill.

(2) Include material and equipment necessary to contain and clean up spills, i.e. non-sparking shovel, broom, dust pan, absorbent material (pads, socks, booms, and kitty litter) compatible with the waste.

b. Sufficient container(s) and label(s) shall be available to properly containerize the spilled material and the debris thereof.

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
VFC-111
Building A-4161

June 2013

6.0 **REVIEW AND UPDATE.** The contingency plan must be reviewed and amended whenever:

- a. There is a revision of applicable regulations.
- b. The plan fails in an emergency.
- c. The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
VFC-111
Building A-4161

June 2013



Attachment (1)

Naval Air Station Key West
Hazardous Waste Management Plan

June 2013

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

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Enclosure (B-9)

Contingency Plan
Bldg B-27

Naval Air Station Key West
Hazardous Waste Management Plan

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NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
NAVAIR, Key West Detachment Atlantic Targets and Marine
Operations (ATMO)
Building B-27 (Outside)

June 2013

1.0 PURPOSE. This Contingency Plan establishes procedures to be utilized in the event of a spill at the less than 90-day storage area locker at NAVAIR (ATMO).

1.1 Scope. The scope of this plan is limited to the initial response by personnel working at the less than 90-day storage area.

If determined by the Senior Fire Official on Duty, that the spill is beyond the scope of this plan, then the NAS Key West Facilities Response Plan (FRP) will be activated at the discretion of NAS Key West personnel.

2.0 SPILL PROCEDURES. Only trained personnel shall attempt to stop, contain, or cleanup a spill, and then only without endangering themselves. If a spill occurs, personnel shall:

- a. **Stop** work immediately.
- b. **Warn** others in the area.
- c. **Evacuate** untrained personnel from the area.
- d. **Identify** the material spilled, if possible.
- e. Put on **personal protective equipment (PPE)** required by the material spilled before attempting any containment or any cleanup action.
- f. **Contain** the spill using kitty litter, absorbent pads or sock booms (designed for the material spilled) to prevent it from entering a floor drain or the environment.
- g. Notify **NAS Key West Fire Department** by dialing (305) 293 3333.
- h. **Maintain adequate ventilation;** if adequate ventilation cannot be guaranteed; **evacuate** and **secure** the area until the Fire Department arrives.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
NAVAIR, Key West Detachment Atlantic Targets and Marine
Operations (ATMO)
Building B-27 (Outside)**

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i. **Provide detailed information** and support to the Fire Department's first responders when they arrive.

3.0 NOTIFICATIONS. Immediately report all spill to the NAS Key West's Fire Department by dialing (305) 293 3333.

Provide the following information:

- a. Activity's Name and phone number.
- b. Building Number and exact location within the building.
- c. Any injuries.
- d. Type of material spilled; if known.
- e. Estimated amount spilled.
- f. Any actions taken.
- g. Any potential threat or release to the environment.

The Fire Department will make all other required notifications.

4.0 EVACUATION MAP. A site evacuation map is not required as the 90 day storage area is a locker located west of Bldg B-27. Attachment (1) is a map of the site location.

5.0 SPILL RESPONSE PREPARATION. Maintain this contingency plan and revisions thereof in the less than 90-day storage area. The HW Coordinator, Alternate and all personnel working the area shall:

- a. Read and understand this contingency plan.
- b. Manage the less than 90-day storage area to prevent spills, fires, and explosions.
- c. Ensure adequate aisle space around the waste containers to allow for the unobstructed movement of personnel, fire and/or clean up equipment.
- d. Post weather resistance signs that are readily visible, that identifies:

(1) Names and phone numbers of Hazardous Waste Coordinator and Alternate.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
NAVAIR, Key West Detachment Atlantic Targets and Marine
Operations (ATMO)
Building B-27 (Outside)**

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(a) The sign must be updated if the HW Coordinator or Alternate changes.

e. Post the evacuation plan where it is clearly visible.

5.1 Safety Equipment. The HW Coordinator shall:

a. Locate a fire extinguisher that is readily available and in an area that would not be affected by a spill.

b. Position an eyewash station so there is direct access and in an area that would not be affected by a spill.

(1) Both the fire extinguisher and the eyewash station shall be inspected monthly.

(2) Maintain the inspections per Fire Department and Safety Department requirements.

c. Ensure there is an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

d. Ensure PPE is available, and located in an area not expected to be affected by a spill, including gloves, safety glasses, face shields, rubber aprons and boots, etc.

5.2 Spill Kit and Equipment. A spill kit and other equipment needed to respond to a spill shall be maintained as follows:

a. The spill kit shall be clearly marked as "HW/HM SPILL KIT".

(1) It must be located in an accessible area that will not be affected by a spill.

(2) Include material and equipment necessary to contain and clean up spills, i.e. non-sparking shovel, broom, dust pan, absorbent material (pads, socks, booms, and kitty litter) compatible with the waste.

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
NAVAIR, Key West Detachment Atlantic Targets and Marine
Operations (ATMO)
Building B-27 (Outside)

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b. Sufficient container(s) and label(s) shall be available to properly containerize the spilled material and the debris thereof.

6.0 REVIEW AND UPDATE REQUIREMENTS. The contingency plan must be reviewed and amended whenever:

a. There is a revision of applicable regulations.

b. The plan fails in an emergency.

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

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
NAVAIR, Key West Detachment Atlantic Targets and Marine
Operations (ATMO)
Building B-27 (Outside)

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Attachment (1)

Naval Air Station Key West
Hazardous Waste Management Plan

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NAS Key West Hazardous Waste Management Plan
Less Than 90-Day Hazardous Waste Storage Area
Standard Operating Procedure

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Enclosure (B-10)

Contingency Plan
Bldg F-1

Naval Air Station Key West
Hazardous Waste Management Plan

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**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Navy Research Laboratory Contingency Plan
Building F-1 (Outside)**

June 2013

1.0 PURPOSE. This Contingency Plan establishes procedures to be utilized in the event of a spill at the less than 90-day storage area locker at Navy Research Laboratory (NRL).

1.1 Scope. The scope of this plan is limited to the initial response by personnel working at the less than 90-day storage.

If determined by the Senior Fire Official on Duty, that the spill is beyond the scope of this plan, then the NAS Key West Facilities Response Plan (FRP) will be activated at the discretion of NAS Key West personnel.

2.0 SPILL PROCEDURES. Only trained personnel shall attempt to stop, contain, or cleanup a spill, and then only without endangering themselves. If a spill occurs, personnel shall:

- a. **Stop** work immediately.
- b. **Warn** others in the area.
- c. **Evacuate** untrained personnel from the area.
- d. **Identify** the material spilled, if possible.
- e. Put on **personal protective equipment (PPE)** required by the material spilled before attempting any containment or any cleanup action.
- f. **Contain** the spill using kitty litter, absorbent pads or sock booms (designed for the material spilled) to prevent it from entering a floor drain or the environment.
- g. Notify **NAS Key West Fire Department** by dialing (305) 293 3333.
- h. **Maintain adequate ventilation;** if adequate ventilation cannot be guaranteed; **evacuate** and **secure** the area until the Fire Department arrives.
- i. **Provide detailed information** and support to the Fire Department's first responders when they arrive.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Navy Research Laboratory Contingency Plan
Building F-1 (Outside)**

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3.0 NOTIFICATIONS. Immediately report all spill to the NAS Key West's Fire Department by (305) 293 3333.

Provide the following information:

- a. Activity's Name and phone number.
- b. Building Number and exact location within the building.
- c. Any injuries.
- d. Type of material spilled; if known.
- e. Estimated amount spilled.
- f. Any actions taken.
- g. Any potential threat or release to the environment.

The Fire Department will make all other required notifications.

4.0 EVACUATION MAP. A site evacuation map is not required as the less than 90-day storage area is a cage located northwest of Bldg F-1. Attachment (1) is the figure showing the site location.

5.0 SPILL RESPONSE PREPARATION. Maintain this contingency plan and revisions thereof in the less than 90-day storage area. The HW Coordinator, Alternate and all personnel working the area shall:

- a. Read and understand this contingency plan.
- b. Manage the less than 90-day storage area to prevent spills, fires, and explosions.
- c. Ensure adequate aisle space around the waste containers to allow for the unobstructed movement of personnel, fire and/or clean up equipment.
- d. Post weather resistance signs that are readily visible, that identifies:

(1) Names and phone numbers of Hazardous Waste Coordinator and Alternate.

(a) The sign must be updated if the HW Coordinator or Alternate changes.

**NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Navy Research Laboratory Contingency Plan
Building F-1 (Outside)**

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e. Post the evacuation plan where it is clearly visible.

5.1 Safety Equipment. The HW Coordinator shall:

a. Locate a fire extinguisher that is readily available and in an area that would not be affected by a spill.

b. Position an eyewash station so there is direct access and in an area that would not be affected by a spill.

- (1) Both the fire extinguisher and the eyewash station shall be inspected monthly.
- (2) Maintain the inspections per Fire Department and Safety Department requirements.

c. Ensure there is an internal communication device (telephone or two-way radio) capable of summoning emergency assistance is available.

d. Ensure PPE is available, and located in an area not expected to be affected by a spill, including gloves, safety glasses, face shields, rubber aprons and boots, etc.

5.2 Spill Kit and Equipment. A spill kit and other equipment needed to respond to a spill shall be maintained as follows:

a. The spill kit shall be clearly marked as "HW/HM SPILL KIT".

- (1) It must be located in an accessible area that will not be affected by a spill.
- (2) Include material and equipment necessary to contain and clean up spills, i.e. non-sparking shovel, broom, dust pan, absorbent material (pads, socks, booms, and kitty litter) compatible with the waste.

b. Sufficient container(s) and label(s) shall be available to properly containerize the spilled material and the debris thereof.

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Navy Research Laboratory Contingency Plan
Building F-1 (Outside)

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6.0 REVEIW AND UPDATE. The contingency plan must be reviewed and amended whenever:

- a. There is a revision of applicable regulations.
- b. The plan fails in an emergency.
- c. The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW).

NAS Key West Hazardous Waste Management Plan
90-Day Storage Accumulation Area Contingency Plan
Navy Research Laboratory Contingency Plan
Building F-1 (Outside)

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Attachment (1)

Naval Air Station Key West
Hazardous Waste Management Plan

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NAS Key West Hazardous Waste Management Plan
Contractor
Standard Operating Procedure

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APPENDIX C

Naval Air Station Key West
Hazardous Waste Management Plan

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**NAS Key West Hazardous Waste Management Plan
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Standard Operating Procedure**

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Enclosures

- C-1 Satellite Accumulation Area Inspection Sheet
- C-2 Less Than 90-Day Storage Inspection Sheet
- C-3 Labels

NAS Key West Hazardous Waste Management Plan
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**NAS Key West Hazardous Waste Management Plan
Contractor
Standard Operating Procedure**

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1.0 PURPOSE.

The purpose of this Standard Operating Procedure (SOP) is to establish procedures for the proper management of hazardous waste (HW), Universal Waste (UW), non-RCRA regulated wastes and Used Oil by contractors operating aboard Naval Air Station (NAS) Key West.

2.0 DEFINITIONS.

A list of definitions is found in Section 2 of this Plan and in the regulations, respectively.

3.0 RESPONSIBILITIES.

The NAS Key West Commanding Officer grants access to contractors working aboard the installation; therefore, any contractor who improperly manages HW or fails to comply with this SOP may be denied access to the installation.

3.1 NAS Key West Personnel:

Shall have immediate access to inspect contractor's work areas and shall report discrepancies to the Contracting Authority (CA).

3.2 Contracting Authorities (CA): Shall;

a. Ensure contractors comply with federal, state, and local regulations, in addition to Navy and NAS Key West instructions.

b. Provide the NAS Key West HWMP including this SOP to all contractors.

c. Notify NAS Key West HW Manager, **before HW is generated**, if a contractor expects to generate waste.

d. Ensure each Statement of Work (SOW) specifies the proper management of HW, Universal Waste (UW), non-RCRA regulated wastes and Used Oil including the handling, storage, transportation, disposal, and

- (1) Identifies an estimate of the type and amount of waste to be generated during the performance of the contract.
- (2) Identifies and ensures required documents are accurate and timely.

**NAS Key West Hazardous Waste Management Plan
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- (3) Requires a Florida certified laboratory completes chemical analysis.
- (4) Requires EPA waste codes be properly identified.
- (5) Requires proper disposal of regulated waste such as petroleum products and wastewater.
- (6) Requires best management practices to minimize the amount of HW and other waste generated.
- (7) Requires the HW disposal costs be included in the contract cost. **NAS Key West is not responsible nor will they pay for the disposal of contractor generated waste.**

e. Require approval from NAS Key West HW Manager for contractor's HW storage location(s).

f. Immediately notify NAS Key West HW Manager if a contractor

- (1) Unexpectedly generates waste.
- (2) If a regulatory violation(s) is identified.
- (3) If a spill/release to the environment occurs.

g. Provide NAS Key West access to HW records.

h. Provide NAS Key West all necessary information to characterize waste.

3.3 All Contractors shall:

a. Take no action or inaction that exposes the Government to liability for non-compliance or other findings or damages, penalties or fines related thereto. In the event a regulatory agency assesses either a monetary or non monetary fine or penalty for Contractor's noncompliance, the Contractor maybe responsible to reimburse the Government for all associated cost.

b. Manage HW, UW, non-RCRA regulated waste, and Used Oil in accordance with applicable federal, state, and local regulations,

**NAS Key West Hazardous Waste Management Plan
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Navy and NAS Key West policies and instructions including this plan and contractual requirements.

Note: Only NAS Key West personnel authorized, in writing, by the Commanding Officer of NAS Key West may sign manifests.

c. Before generating waste, obtain from NAS Key West via CA, approval for HW storage, including location and type of storage (i.e., SAA or Less Than 90-day Storage Area)

d. Provide immediate access to NAS Key West Environmental Division personnel to inspect locked HW, UW, non-RCRA regulated waste, and Used Oil storage units.

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

e. Remove all HM and waste upon completion of contract. NAS Key West shall dispose of any HM or waste abandoned by a contractor. Abandoned waste shall be managed as an unknown waste; the contractor shall bear the cost of any analytical, disposal and other costs.

f. NAS Key West shall notify the CA of improper management or disposal of waste.

g. Reimburse NAS Key West for services rendered.

4.0 HAZARDOUS WASTE MANAGEMENT.

HW shall be managed in accordance with federal, state and local regulations in addition to Navy and NAS Key West policies and instructions. Contact NAS Key West HW Manager, via the CA regarding proper handling, storage and disposal procedures.

a. **It is strictly prohibited to dispose of any waste into any wastewater treatment system, oily waste treatment system, storm drain, surface waters, or upon the land without written authorization from NAS Key West.**

**NAS Key West Hazardous Waste Management Plan
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b. HW segregation is mandatory. Proper segregation prevents incompatible chemicals from mixing and allows proper treatment and/or disposal options.

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

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

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

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

g. Used Petroleum-based products such as hydraulic fluids, lubricating oils, diesel fuel marine, JP-5, JP-8, and other fuels with a flash point above 140 degrees Fahrenheit that do not contain solvents of any type, chlorinated or non chlorinated, are managed as Used Oil.

h. Contractors shall manage SAAs in compliance with regulations and Section 4.1 that discusses SAA requirements.

i. Contractor shall manage less than 90-day storage sites in compliance with regulations and Section 4.2 that discusses less than 90-day storage requirements.

j. Utilize good housekeeping practices at all times.

k. All manifests for HW and non-RCRA regulated waste generated by NAS Key West must be signed by NAS Key West HW personnel on the day the transporter picks up the waste.

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4.1 Satellite Accumulation Areas (SAA):

a. Locate SAAs, approved by the NAS Key West HW Manager, at or near any point of generation and under the control of the operator generating the waste.

b. Accumulate no more than 55 gallons (cumulative total of all types of HW) or 1 quart of acute HW in the SAA. The 55-gallon limit does NOT include non-RCRA regulated waste, UW or Used Oil. Once the 55-gallon limit is reached; date the container and transfer it to a 90-day storage area, or permitted HWSF within three (3) **calendar** days.

c. Complete weekly inspections on the inspection sheet provided by the CA and submit, via the CA, no later than the close of business the following Tuesday to NAS Key West IEPD.

4.2 Less Than 90-Day Storage Sites:

a. A contractor may operate a less than 90 day storage site. However, the site may not be established without prior approval from NAS Key West HW Manager. Each approval is evaluated on a case-by-case basis.

b. NAS Key West must approve less than 90-day storage site before waste may be stored.

c. Control access at all times, fence the area and keep it locked or located within a secured building.

d. Secondary containment is required for all containers containing liquid waste (i.e., concrete curbs or spill pallets).

e. Store incompatible wastes separately; use berms/spill pallets to prevent incompatible materials from coming into contact with each other in the event of a spill or leak.

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

g. Post weather-resistant signs stating "**NO SMOKING WITHIN 50 FEET**" on all exterior sides of the 90 -day site. Each sign shall be clearly visible from 50 feet.

**NAS Key West Hazardous Waste Management Plan
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h. Post weather resistant signs reading "**DANGER - UNAUTHORIZED PERSONNEL KEEP OUT**" and "**HAZARDOUS WASTE STORAGE AREA**" on each entrance. Each sign shall be clearly visible from 25 feet.

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

- (1) Material and equipment needed to contain the accumulated waste.
- (2) If flammable liquids are accumulated, have absorbent (i.e., kitty litter or cloth absorbents), non-sparking shovel and dust pan to remove spill residue, gloves, face shields, rubber boots, etc.
- (3) Sufficient containers and labels for potential spills.

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

k. Labels shall be clearly visible for inspection.

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

m. Complete and document weekly inspections. Submit the completed inspection sheets, enclosure (C-2), to NAS Key West HW Manager, via the CA, not later than the close of business Tuesday of the following week.

4.3 Container Management:

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

b. Containers shall be closed except when adding waste.

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

CAUTION: USE NON-SPARKING TOOLS ON CONTAINERS OF FLAMMABLE MATERIALS.

**NAS Key West Hazardous Waste Management Plan
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d. Immediately transfer material from unsealable containers.

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

4.4 Proper Labeling:

a. Complete all labels using indelible ink.

b. All HW containers shall be labeled with a preprinted HW label with the required warnings (example shown in Enclosure (C-3) and the following information shall be annotated on each label.

1. USEPA I.D. Number
2. Generator Name and address
3. Proper DOT shipping name
4. USEPA Waste Codes
5. Accumulation start date when required

c. Label non-RCRA regulated containers with a completely filled out Non-RCRA regulated label; antifreeze and grease are examples of non-HW (example shown in Enclosure (C-3) and the following information shall be annotated on each label.

1. Shipper
2. Address
3. Contents
4. Proper DOT shipping name

d. Used Oil shall be labeled with the words "USED OIL".

e. Label Universal Waste using Universal Waste Label and annotate the date the first waste is added to the container (example shown in Enclosure (C-3) and the following information shall be annotated on each label.

1. Shipper
2. Address
3. Contents
4. Proper DOT shipping name

**NAS Key West Hazardous Waste Management Plan
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5.0 MANIFESTS.

Only personnel authorized in writing by the Commanding Officer of NAS Key West may sign manifests that require an NAS Key West signature. Contractors shall ensure that only authorized personnel sign manifests; contractors shall contact the NAS Key West HW Manager before making any arrangements to remove waste from the installation.

a. A draft copy of the manifest shall be provided to the NAS Key West HW Manager at least 24 hours prior to the scheduled pickup.

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Enclosure (C-1)

SAA Inspection Form

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Hazardous Waste Management Plan

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**NAS Key West
SATELLITE INSPECTION FORM**

Command: _____ Department: _____ SAA ID: _____

HW Coordinator: _____ Date: _____ Time: _____

- Has NASKW, in writing, approved this SAA? Sat Unsat
- Is the Satellite at or near the point of generation and under the control of the generator? 40 CFR 262.34 Sat Unsat N/A
- Is there less than 55 gallons of HW accumulated? 40 CFR 262.34 Sat Unsat N/A
- Is the SAA clearly identified? 40 CFR 262.34 Sat Unsat N/A
- Are the SAA physical boundaries defined 40 CFR 262.34 Sat Unsat N/A
- Are containers properly labeled (HW, Used Oil, etc.)? 40 CFR 262.34 Sat Unsat N/A
- Are containers in good condition? 40 CFR 265.171 Sat Unsat N/A
- Are containers closed? 40 CFR 265.173 Sat Unsat N/A
- Are containers stored to prevent ruptures or leaks? 40 CFR 265.173 Sat Unsat N/A
- Are Universal Waste Containers dated? 40 CFR 173.15 Sat Unsat N/A
- Are the containers closed? Sat Unsat N/A
- Are batteries separated by type? Sat Unsat N/A
- Are the battery terminals taped? Sat Unsat N/A
- Is the waste stored with compatibles? 40 CFR 265.172 Sat Unsat N/A
- Are waste determination completed for each waste? 40 CFR 262.11 Sat Unsat N/A
- Is log book correctly format and maintained? Sat Unsat N/A
- Are the personnel who handle HW trained? 40 CFR 262. Sat Unsat N/A
- Is the housekeeping in the SAA in good order? Sat Unsat N/A

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW only)

Date of oldest UW: _____ Total Gallons of HW: _____

Discrepancies: _____

Corrective Action: _____

Transfer Information: Number of Drums Manifest Number

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____ Signature: _____ Date: _____

Naval Air Station Key West
Hazardous Waste Management Plan

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Enclosure (C-2)

90 Day Inspection Form

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Hazardous Waste Management Plan

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**NAS Key West
Hazardous Waste Inspection Form
90-Day Accumulation Areas**

Building/Location: _____

Date: _____

Accumulation Site: _____

Time: _____

Are containers properly labeled HW/UW/Used Oil?	40 CFR 262.34	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are HW / UW containers dated?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the Contingency Plan posted?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are "No Smoking", "Danger" and "HW Storage" signs posted?	40 CFR 264.17	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the area fenced in, locked and bermed to prevent the release of HW?	40 CFR 265.31	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is fire equipment available and maintained?	40 CFR 265.32	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is a spill kit available and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there an eye wash directly accessible?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there access to a telephone or radio for Emergency calls?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is aisle space adequate? (30"minimum)	40 CFR 265.35	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers in good condition?	40 CFR 265.171	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is waste compatible with container?	40 CFR 265.172	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers closed?	40 CFR 265.173	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers stored to prevent ruptures/leaks?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are weekly inspections documented?	40 CFR 265.174	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the waste stored with compatibles?	40 CFR 265.177	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is housekeep in good order		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is logbook in the correct format and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Number of HW Containers?	Oldest Date:	Number of UW Container?	Oldest Date:

Discrepancies: _____

Corrective Action: _____

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW)

Transfer Information: Number of Drums Manifest Number

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____

Signature: _____

Date: _____

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Hazardous Waste Management Plan

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Enclosure (C-3)

Labels

Naval Air Station Key West
Hazardous Waste Management Plan

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**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME _____

ADDRESS _____ PHONE _____

CITY _____ STATE _____ ZIP _____

MANIFEST TRACKING NO. _____ ACCUMULATION START DATE _____

EPA ID NO. _____ EPA WASTE NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM8

LABELMASTER® (800) 621-5808 www.labelmaster.com

Base Hazardous Waste Label (Yellow)

**NON-RCRA
REGULATED
WASTE**

THIS WASTE NOT REGULATED BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY 40CFR(RCRA) BUT MAY BE SUBJECT TO DEPT. OF TRANSPORTATION REGULATIONS, (49CFR) OR STATE OR LOCAL REGULATIONS.

GENERATOR INFORMATION:

SHIPPER: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PROPER D.O.T. SHIPPING NAME: _____

UN OR NA NO.: _____

PHONE: _____

NON-RCRA REGULATED WASTE

BWMT LABELMASTER® (800) 621-5808 www.labelmaster.com

Non-RCRA Regulated Label

USED OIL

USED OIL

GENERATOR INFORMATION

COMPANY _____

ADDRESS _____

CITY/STATE/ZIP _____

SOURCE _____

CONTACT _____

SWMV LABELMASTER® (800) 621-5808 www.labelmaster.com

Used Oil Label

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

Lab Safety Supply Inc.

Reorder No. 42109

Universal Waste Label

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APPENDIX D

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Enclosures:

- D-1 List of POL Sites
- D-2 Used Oil Label

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**NAS Key West Hazardous Waste Management Plan
Used Oil Management
Standard Operating Procedure**

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1.0 PURPOSE.

This Standard Operating Procedure (SOP) establishes procedures for the management of Used Oil by all activities and contractors operating onboard NAS Key West.

2.0 DEFINITIONS.

A short list of definitions is provided for a quick reference.

a. Aboveground Used Oil Storage Tank. A tank used to store or process used oil that is not an underground storage tank or a container.

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

c. Spill/Release. Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment any hazardous material (HM) where such a release has the potential to threaten human health or the environment.

d. Used Oil. Any oil refined from crude oil or synthetic oil that as the result of use, storage, or handling, has become contaminated or unsuitable for use due to the presence of physical or chemical impurities or loss of its original properties.

e. POL Site. Any approved location storing only "used" petroleum, oils or lubricants (POL).

3.0 GENERAL USED OIL MANAGEMENT.

It is prohibited to dispose of Used Oil into any wastewater treatment system, storm drain, surface water body, or onto the land. Used oil shall not be used as a dust suppressant or for other such applications to the land.

a. Segregation of Used Oil is mandatory. Proper segregation prevents incompatible chemicals with the potential to produce heat, pressure, fire, explosions, violent reactions, toxic dust, mists and irritating or toxic fumes or gases from mixing.

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- (1) Do **not** mix Used Oil with any hazardous waste (HW), including chlorinated or non-chlorinated solvents, as the resulting mixture is a HW.
- (2) Do **not** mix solid wastes with Used Oil as it may prevent used oil from being recycled.
- (3) Do **not** mix Used Oil with any petroleum product containing solvents.
- (4) Do **not** mix Used Oil with petroleum products that were used as solvents.

b. Used Oil may be mixed with off-specification fuels including Diesel, JP-5, JP-8 and other fuels with a Flash Point greater than 140⁰ F.

3.1 Storage:

Store Used Oil in non-leaking structurally sound aboveground storage tanks or approved containers in good condition (minor corrosion or dents) and compatible with the Used Oil stored in them.

a. Used oil containers and aboveground storage tanks shall be closed except when adding or removing the Used Oil.

b. Maintain only POL sites approved by the HW Manager. Enclosure (D-1) is a list of approved POL sites.

3.2 Secondary Containment:

All Used Oil containers and above ground tanks that are not stored inside an enclosed building must be in secondary containment. The containment shall:

a. Be capable of containing 110% of the contents of the single largest compartment or container.

b. Be kept clean, no liquids in the containment.

c. If rainwater collects in the containment, it shall be properly managed.

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3.3 Labeling:

a. Label containers and aboveground storage tanks with the words "**Used Oil**" or with a Used Oil label, example in Enclosure (D-2).

c. Label buckets and drip pans used to collect and store Used Oil with the words "**Used Oil.**"

3.4 Full Containers/Pick Ups:

Contact NAS Key West Aircraft refueling contractor to arrange for the pickup and recycling of Used Oil.

a. The contractor will test your Used Oil. If the Used Oil is not acceptable to the contractor, contact NAS Key West HW Manager immediately.

4.0 TRAINING.

Ensure personnel handling petroleum products and Used Oil are trained to respond to spills in a safe manner.

5.0 SPILLS AND RELEASES.

In the event of a release/spill of Used Oil to the environment, only trained personnel shall make every effort to stop and contain the spill, without endangering their safety.

Report all spills of Used Oil to the NAS Key West Fire Department 305-293-3333.

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Enclosure (D-1)

Used Oil Label

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Used Oil Label

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Enclosure (D-2)

Approved
POL Storage Areas

Naval Air Station Key West
Hazardous Waste Management Plan

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NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS DEPARTMENT (ENVIRONMENTAL)	
RCRA Part B HW Storage Facility	Boca Chica - Bldg A-4078
Less Than 90 Day Site	Boca Chica - Bldg A-824
SAA-1	Boca Chica - Bldg A-824
SAA-2A	Boca Chica - Bldg A-824
SAA-2B	Boca Chica - Bldg A-824
SAA-3	Boca Chica - Bldg A-824
SAA-4	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824
POL Area	Boca Chica - Bldg A-824 Outside
PORT OPERATIONS DEPARTMENT	
SAA-1	Truman Annex - Bldg 289 Inside Middle Bay
POL Area	Truman Annex - Bldg 289 Inside Middle Bay
VFC-111	
Less Than 90 Day Site	Boca Chica Bldg A-4161 Cage #9 & 10
POL Area	Boca Chica Bldg A-4161 Cage #9 & 10
SAA 1	Hanger A-936
SAA 2	Hanger A-936
VFA-106 DET KEY WEST	
POL Area	Boca Chica Bldg A-4161 Cage #7 & 8
POL Area	Hanger A-936
Universal Waste Area	Hanger A-936
NAVY RESEARCH LAB (NRL)	
Less Than 90 Day Site	Fleming Key Bldg F-1 Outside
SAA 1	Fleming Key Bldg F-1 Rm 107
SAA 2	Fleming Key Bldg F-1 Rm 108
SAA 1	Fleming Key Bldg F-14
ATLANTIC TARGETS & MARINE OPERATIONS (ATMO/NAVAIR)	
Outside 90 Day	Trumbo Point Bldg B-27 CG Outside
POL Area	Trumbo Point Bldg B-27 CG
SAA	Trumbo Point Bldg B-27 CG Rm 110-B
Parts Washer	Trumbo Point Bldg B-27 CG
ARMY SPECIAL FORCES	

NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
SAA	Fleming Key Bldg KW-600
Parts Washer	Fleming Key Bldg KW-600
POL Area	Fleming Key Bldg KW-600
AIR OPS (OMD)	
SAA	Boca Chica Bldg A-331
POL Site	Boca Chica Bldg A-331 Outside
AIR OPS (Arresting Gear)	
SAA	Boca Chica Bldg A-128 Outside
POL Site	Boca Chica Bldg A-128 Outside
AIR OPS (Fleet Liaison)	
POL Site	Boca Chica Bldg A-4061 Cage A-4161
HAZMIN CENTER (CHIMP)	
Less Than 90 Day Site	Boca Chica Bldg A-931
POL Site	Boca Chica Bldg A-931
FLEET READINESS CENTER (FRC) Hdqts	
SAA NDI	Boca Chica Bldg A-980 RM 138
SAA Tire Shop	Boca Chica Bldg A-980 RM 123
SAA Oil Lab	Boca Chica Bldg A-980 RM 112
POL Area	Boca Chica Bldg A-980 Outside
FRC (Corrosion Control)	
Less Than 90 Day Site (Inactive)	Boca Chica Bldg A-990 Outside
SAA (Blast Booth)	Boca Chica Bldg A-987
SAA (Paint Booth)	Boca Chica Bldg A-990
FRC (Gound Support Equipment)	
POL Site	Boca Chica Bldg A-986 Outside
Parts Washer	Boca Chica Bldg A-986
Auto Hobby Shop	
POL Site	Boca Chica Bldg A-730 Outside
Parts Washer	Boca Chica Bldg A-730
SAA	Boca Chica Bldg A-730
NAVY MUNITIONS COMMAND (Weapons)	
POL Site	Boca Chica Bldg A-1115
Parts Washer	Boca Chica Bldg A-1115
PUBLIC WORKS (Heavy Equipment/Maintenace)	
POL Site	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438

NAS Key West Harzardous Waste Management Plan
Approved Hazardous Waste SAA, Less Than 90 Day, UW POL Storage Areas

COMMAND/ACTIVITY STORAGE AREA	LOCATON (ANNEX & BUILDING)
PUBLIC WORKS (Metal Trade/Maintenace)	
SAA	Boca Chica Bldg A-438 Outside
Parts Washer	Boca Chica Bldg A-438
PHOENIX AIR (Aeromarti)	
POL Site	Boca Chica Bldg A-129 Outside
SIGSBEE MARINA	
SAA	Sigsbee Annex Bldg V-400
POL Site	Sigsbee Annex Bldg V-400 Outside
NAVAL BRANCH HEALTH CLINIC	
SAA	NBHC Bldg L-48 Dental Lab
SAA	NBHC Bldg L-48 Pharmacy
SAA	NBHC Bldg L-48 Immunization Lab
UW Site	NBHC Bldg L-48
AIR FORCE (Aerostat Site)	
SAA	Cudjoe Key, Bldg 12923/12926
JOINT INTERAGENCY TASK FORCE SOUTH (JIATFS)	
UW Site	Truman Annex Bldg 289
HAWTHORNE FUELS	
POL Site	Boca Chica Bldg A-935

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APPENDIX E

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Enclosure:

E-1 Universal Waste Label

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**NAS Key West Hazardous Waste Management Plan
Universal Waste
Standard Operating Procedure**

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1.0 PURPOSE.

The purpose of this standard operating procedure (SOP) is to establish procedures for the management of Universal Waste (UW) by all activities and contractors operating on board NAS (NAS) Key West.

2.0 DEFINITIONS.

A short list of definitions is provided for a quick reference. A complete list of definitions is found in Section 2 of this plan and in the regulations.

a. Accumulation Start Date for Universal Waste. The date the first waste is placed in the container.

b. Lamp (Light Bulbs). The bulb or tube portion of electric lighting devices. Common universal waste (UW) lamps include fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide.

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

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

e. Universal Waste (UW). Batteries, fluorescent lamps, some pesticides, and mercury-containing devices formally classified as HW, but are now subject to less stringent UW regulations, when recycled if recycling is available.

3.0 UNIVERSAL WASTE MANAGEMENT (UW).

Immediately containerizes all UW as soon as it is generated. UW may be stored up to four (4) months from the date the first waste is placed in the container. Contact the NAS Key West HW Manager when a container is four (4) months old to arrange for pickup.

3.1 UW Segregation:

The types of UW that may be accumulated includes; batteries, lamps, mercury containing equipment and pesticides. Guidelines for containerizing UW:

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- a. Only one type of waste per container.
- b. Only one type of battery per container.

3.2 UW Labeling:

An example UW label is shown in Enclosure (E-1). All labels must be filled out using an indelible ink marker and include the following information:

- a. Shipper: **Commanding Officer**
- b. Address: **NAS Key West**
- c. City: **Key West**
- d. State: **Florida**
- e. Zip: **33040**
- f. Contents: Identify the contents of the container
- g. The Accumulation Start Date: Date the first item was placed in the container

3.3 Battery Management:

3.3.1 Lead Acid Batteries

Store lead acid batteries (i.e., car batteries) to prevent spills. Damaged batteries (i.e., breached casing) must be managed as HW including any acid spilled from the battery.

Caution. Lead acid batteries that are leaking are hazardous waste and must be managed as such. Contact the NAS Key West HW Manager for assistance.

Non leaking batteries are exemption from most HW regulations if recycled.

3.3.2 Non-Lead Acid Batteries

Non-Lead acid batteries (i.e., Nickel Cadmium, Nickel Halide, Magnesium, Lithium, Mercury, Alkaline, etc.) shall be:

- a. Segregated by battery type into proportionately sized structually sound DOT approved containers.

- (1) Only one type of battery per container.

Safety Note: Ensure batteries are segregated and containerized by type: Lithium, Magnesium, Mercury and Nickel Cadmium and that

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all safety requirements for each type of battery are met (i.e., tape both terminals (ends) and/or bag each individual battery).

Batteries will not be picked up if the safety requirements are not complied with.

b. Label UW containers as shown in Section 3.2.

Caution: Failure to date an UW container is a violation that could result in fines and/or penalties.

3.4 Fluorescent Light Management:

Store unbroken fluorescent lamps in a structurally sound DOT approved containers. Keep the containers closed except when adding the lamps. The original box or a two or three-ply cardboard box may be used to containerize the bulbs. Label UW containers as shown in Section 3.2. Date each container (box) with the date the first lamp is placed in the container.

Caution. Broken lamps are HW and must be managed as such.

- a. Place broken lamps in a structurally sound DOT approved container.
- b. Keep the container closed except when adding broken lamp(s).
- c. Label as HW.
- d. Do **not** date the container unless the container is located in a less than 90-day storage area.
- e. Manage the HW container of broken lamps in accordance with this plan.

3.5 Mercury-Containing Devices:

Place mercury-containing devices into a structurally sound DOT approved container that is properly labeled as UW. For devices where the mercury is not in a sealed ampule, the mercury must be inside a sealed air-tight casing. Label UW containers as shown in Section 3.2.

Caution: Mercury spills must be properly cleaned up and the recovered mercury managed as HW. Immediately contact NAS Key West HW Manager and your Safety Officer if a mercury spill occurs.

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3.6 Pesticides:

Store pesticides in a closed structurally sound DOT approved container. Label UW containers as shown in Section 3.2.

4.0 UW TURN IN.

Contact NAS Key West HW Manager to schedule a turn-in when a container is full or when the UW has been stored for four (4) months.

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Enclosure (E-1)

Label

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**UNIVERSAL
WASTE**

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

Lab Safety Supply Inc.

Reorder No. 42109

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APPENDIX F

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F-1 Munitions Rule Evaluation Process

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- Ref: (a) Navy MMR Implementation Policy, SER N457F/452-98, 27 July 1998
(b) NAVSEA OP 5 Volume 1 (Ammunition and Explosives Safety Standards)
(c) NOSSA Instruction 8023. Series
(d) Emergency Planning and Community Right-to-Know Act (EPCRA) 42 USC 11001
(e) NAS Key West Instruction 8026.1 series
(f) NAS Key West Facility Response Plan

1.0 PURPOSE.

This procedure provides guidance for the proper storage and disposal of WMM managed under the Conditionally Exemption, reference (a) and codified in 40 CFR 266.200.

1.1 Applicability:

The Resource Conservation and Recovery Act (RCRA) authorized the U.S. Environmental Protection Agency (USEPA) to implement Hazardous Waste (HW) management regulations from the point of generation through the final treatment and disposal, that is, "Cradle to Grave." The U.S. Congress waived sovereign immunity for DoD facilities subjecting them to full regulation including assessment of fines and penalties. The USEPA granted the State of Florida authority to implement and enforce HW regulations for identification, packaging, labeling, storing, transporting, disposal and treatment standards.

At the request of DoD, the USEPA gave special consideration to WMM with the promulgation of the Military Munitions Rule (MMR) that exempts WMM from the HW regulations if the WMM are managed in accordance with the conditions set forth in the exemption.

WMM that are not managed as conditional exempt are explosive hazardous waste (EHW) subject to full regulation under RCRA.

2.0 DEFINITIONS.

a. Chemical Munitions. Munitions that contain chemicals that could produce lethal or dangerous effects on human health. This does not include riot control agents, chemical herbicides, smoke and other obscuration materials that are further defined in reference (a).

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b. Conditional Exemption (CE). Hazardous waste management activities that are exempt from the Hazardous Waste regulations when a waste is managed within the requirements set forth in the exemption. WMM managed under the CE rule are relieved of the extensive regulatory requirements RCRA and DOT.

c. Disposition. An evaluation process to determine whether munitions are excess, unusable, reusable, recycled, or should be treated and disposed.

d. Military Munitions (MM). All ammunition products and components produced or used by or for the U.S. Department of Defense or the U.S. Armed Services for national defense and security, including MM under the control of the Department of Defense, the U.S. Coast Guard, the U.S. Department of Energy and National Guard personnel. The term includes: confined gaseous, liquid and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes and incendiaries used by DoD Components, including bulk explosives and chemical warfare agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, devices and components thereof. It does not include: wholly inert items, improvised explosive devices, and nuclear weapons, devices and components thereof. See reference (a) for additional information.

3.0 RESPONSIBILITIES.

3.1 NAS Key West Navy Munitions Command (NMC) Detachment shall:

a. Manage and store WMM in accordance references (a), (b), (c), (e) and this procedure.

b. Prepare and submit disposition requests and implement disposition instructions once directed.

c. Obtain required DoD Explosives Safety Board (DDESB) explosive safety site approval(s) for bunkers used to store WMM.

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d. Identify the CE bunker/magazine where WMM are stored to NAS Key West Environmental Division before placing them into service.

e. Maintain the CE bunker/magazine per reference (a).

f. Conduct an annual inventory of the stored CE WMM and maintain the records for three years.

g. Conduct and document quarterly compliance inspections with the NAS Key West Explosive Safety Officer (ESO), maintain the records for three years and provide a copy of the inspections to the ESO and NAS Key West Environmental Division.

h. Ensure only trained and authorized personnel enter the CE bunker/magazine.

i. Support the ESO in preparing an explosive safety briefing that is presented to all personnel entering the CE bunker/magazine.

j. Prepare transportation forms for CE and non-CE WMM identified in this guidance.

k. Ensure appropriate personnel receive training as required and maintain records of this training.

l. Immediately notify NAS Key West Commanding Officer and the Environmental Division of any loss or theft of WMM.

3.2 Navy Explosive Ordnance Detachment (EOD) shall:

a. Complete emergency response involving military munitions of any type, both foreign and domestic.

b. Complete emergency disposition as required to protect human life.

c. Transport WMM from storage bunkers/magazines to both onboard and off station destinations.

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3.3 NAS Key West Explosive Safety Officer (ESO) shall:

- a. Prepare and submit through appropriate channels documentation of any conflict that occurs between this guidance and references (a), (b) and (c).
- b. Support NAS Key West NMC in identifying bunkers/magazines for storage of CE WMM.
- c. Prepare an explosive safety briefing for all authorized visitors to CE bunkers/magazines.
- d. Ensure appropriate personnel receive HW/MM Rule training as required by this section and maintain records of this training.

3.4 NAS Key West Environmental Division shall:

- a. Serve as liaison to the Florida Department of Environmental Protection (FDEP) regarding all WMM matters.
- b. Support NAS Key West ESO's documentation of conflicts that occur between this SOP and reference (a), (b) and (c).
- c. Notify FDEP, in writing, within 90 days of designating a bunker/magazine CE storage or if a bunker/magazine is no longer used as CE WMM storage.
- d. Provide verbal notification to FDEP within 24 hours and follow up written notification within 5 days of any loss, theft or violation of the storage standards, Department of Transportation or DoD standards or policies that may pose a threat to human health or the environment.
- e. Accompany personnel from the FDEP during inspections of CE bunkers/magazines.
- f. Verbally notify FDEP within 24 hours and provide written notification within 5 days of any unpermitted or uncontrolled detonation, release, discharge or migration of WMM from any storage unit that may endanger human health and the environment.

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g. Ensure compliance with EPCRA emergency response requirements and complete required notifications to responsible agencies, e.g. FDEP and USEPA.

h. Assist NAS Key West NMC and EOD with the documentation required for the shipment or thermal treatment of WMM as needed. This review must be conducted before the shipment or treatment of the WMM.

i. Assist the NAS Key West NMC with quarterly CE bunker/magazine inspections.

j. Assist and train NAS Key West personnel in the storage, labeling, packaging, transportation and manifesting requirements and other regulatory requirements for the shipment of WMM that are managed under RCRA as HW.

k. Ensure all appropriate personnel receive HW/MM Rule training and maintain training records.

l. Coordinate the closure of bunkers/magazines that stored WMM.

3.5 NAS Key West Public Works Department shall:

a. Maintain a contract for the proper disposal of Explosive Hazardous Waste (EHW) or WMM managed in accordance with HW regulations.

4.0 GENERAL REQUIREMENTS.

If this procedure conflicts with explosive safety requirements, utilize the guidance set forth in reference (b) and (d) until a resolution is found.

a. All WMM and their components shall be managed according to this procedure. If for any reason the WMM cannot be managed as conditionally exempt they shall be managed as EHW in accordance to RCRA.

b. Federal and Florida regulations require the generator to determine, if WMM are EHW; then document and track the WMM from the point of generation through final disposal; however, this does **NOT** apply to WMM managed under CE provisions.

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c. Enclosure (1) is a schematic tool for determining if a MM is a WMM and the proper disposal requirements.

5.0 WASTE DETERMINATION (DISPOSITION PROCESS).

The Navy Designated Disposition Authority (DDA) determines whether a MM is to be used, recycled, repaired, treated or disposed of.

5.1 When Military Munitions Are Not a Waste:

Unused MM are **NOT** WMM when:

- a. Used in training; **or**
- b. Used in Research, Development, Test, & Evaluation (RDT&E); **or**
- c. Recovered, collected and destroyed on-range during range clearance operations at active or inactive ranges; **or**
- d. Unused munitions (including subcomponents) when repaired, reused, or recycled, reclaimed, disassembled, reconfigures or otherwise subjected to materials recovery activities.
- e. When removed from a range for the purpose of:
 - (1) Evaluation and testing. However, when the required evaluation or test is completed any remaining munitions or components become WMM and subject to HW requirements.
 - (2) Repair or reuse. Used MM removed from a range for repair, reuse or an evaluation that includes a determination of whether or not the munitions is repairable or reusable are not WMM. MM that cannot be repaired or reused is WMM.

5.2 When Military Munitions are a Waste:

5.2.1 Unused MM are waste when:

- a. Abandoned by being disposed, burned, detonated, incinerated or treated prior to disposal; **or**
- b. Removed from storage for the purpose of disposal, burning, incinerating or treatment prior to disposal; **or**

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c. Deteriorated or damaged to the point that it cannot be put into a serviceable condition and cannot reasonably be recycled or used for other purposes; **or**

d. Declared a waste by an authorized military official.

5.2.2 Used MM are Waste: (Used or fired MM)

a. Transported off-range for storage, reclamation, treatment or disposal; or

NOTE: Firing-range scrap metal including expended brass and mixed metals generated through firing-range clearance are excluded from the definition of solid waste; therefore, excluded from regulation if recycled as scrap metal.

b. The MM is fired off-range and not promptly rendered safe and/or retrieved (see ref (a)).

6.0 STORAGE OF WMM.

a. Items determined via the disposition process or MM that by definition are WMM shall be stored in a magazine that meets Conditionally Exempt (CE) requirements as specified in references (a), (b), and (c). No bunker/magazine that requires a waiver or exemption shall be used to store WMM under CE status.

b. CE WMM may be stored in approved CE bunkers/magazines indefinitely; subject to the following conditions:

- (1) The WMM is not a chemical munitions (smokes, obscurants, and riot control agents are NOT included in the definition of chemical weapons or agents).
- (2) The WMM is stored under the jurisdiction and in accordance with the DoD Explosives Safety Board (DDESB) standards.
- (3) The CE bunkers/magazines are approved as DDESB explosives safety sites and the documentation available to State of Florida upon request.
- (4) The FDEP shall be provided all required notices including immediate notification of any loss or theft

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of WMM, or violations of DDESB standards that endanger human health or the environment.

(5) Access is limited to trained authorized personnel.

Note: FDEP personnel briefed on explosives safety are authorized access only when escorted by qualified and certified NAS Key West NMC and Environmental personnel.

(6) Annual inventories and quarterly inspections are completed and the records are maintained for at least 3 years; **and**

(7) Written records of all WMM stored are maintained for 3 years from the date inventoried, inspected or removed.

(8) Records are available for review by the FDEP or USEPA upon request. These records shall contain the following information:

(a) The type of WMM stored by standard nomenclature, lot number, Federal Supply Class (FSC), National Stock Number (NSN), Department of Defense Ammunition Code (DODAC), Navy Ammunition Logistics Code (NALC), and material condition code.

(b) The quantity of each type of WMM stored.

(c) The date that each MM was identified as a waste.

(d) The last storage date (i.e., date removed from storage) for each, by type, of WMM.

(e) The storage location or locations.

(f) The disposition (e.g., destroyed, demilitarized, shipped) and date of action, by type, of the WMM.

(g) When applicable, the sending and receiving sites for WMM received from or shipped to an off-site location.

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c. The same bunker/magazine may store other munitions if:

- (1) Compliant with the explosive safety requirements.
- (2) The WMM shall be stored on separate pallets and marked as WMM.

d. Labels and Marking. RCRA and DOT regulatory labels and marking are not required for WMM unless they are removed from the CE bunker for the purpose of treatment or disposal as HW under RCRA. Before taking any action that would result in the WMM becoming subject to RCRA, notify the NAS Key West Environmental Division.

(1) WMM stored under CE shall be marked with the words
"WASTE MM - STORED UNDER CE."

(2) Individual container markings are not required if a group of containers are marked as WMM.

6.1 Compliance with the Facility Response Plan:

a. NAS Key West NMC will ensure compliance with the Facility Response Plan/Emergency Response Plans references (d) and (f). At a minimum:

- (1) Maintain specific emergency preparedness, contingency planning, and security.
- (2) Minimize unpermitted or uncontrolled detonation, releases and discharges of WMM that may endanger human health or the environment.
- (3) Immediately notify NAS Key West Command Duty Officer and the Installation Environmental Program Director (IEPD) in the event of an actual or potential detonation or uncontrolled release, discharge or migration of WMM that may endanger human health or the environment.

7.0 TRANSPORTATION OF WMM CONDITIONAL EXEMPT PROVISIONS.

a. Conditions that shall be met to exempt WMM from transportation as HW:

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- (1) The WMM is not a chemical agents or chemical munitions.
- (2) The WMM is transported to a military owned or operated treatment, storage, or disposal facility with a Subpart X permit.
- (3) The WMM shall be transported in accordance with all DoD requirements.

7.1 Transportation Forms:

a. The following forms shall utilize when transporting CE WMM over public roads or waterways:

- (1) DD Form 1907 - Signature and Tally Record Form.
- (2) DD Form 626 - Motor Vehicle Inspection Report (Transporting Hazardous Materials. The form versions dated Oct 1995 AND Sep 1998 MUST be completed.
- (3) DD Form 836 - Shipping Paper and Emergency Response Information for Hazardous Materials Transported by Government Vehicles. The form versions dated Aug 1989 AND Sep 1998 MUST be completed.
- (4) DD Form 1348-1A - DoD Single Line Item Release/Receipt Document.
- (5) DD Form 1103 - GSA standard Government Bill of Laden.

Notes:

1. Newer versions are also required to comply with DoD/DoN requirements.
2. These forms may only be used for military vehicles with military drivers such as EOD.

8.0. DISPOSAL WMM AS HW.

WMM shipped through or to a State that has not adopted the WMM Rules or a shipment to a commercial RCRA Subpart X permitted facility is not exempt therefore, shall be managed as HW not CE WMM.

a. Disposal of all WMM as HW shall be completed via DLA contractors.

9.0 RANGE OPERATIONS RECORD.

NAS Key West NMC shall maintain range use records:

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a. All MM expenditures by types, quantities, locations and estimated dud rates.

b. All mishaps attributed to Unexploded Ordnance (UXO) that occurred either on or off the range.

c. Indicate all areas containing known or suspected UXO on the activity's maps.

d. The type and location of used munitions landing off-range that are not retrieved and/or rendered safe.

10.0 EMERGENCY RESPONSE.

All emergency response actions shall be conducted by Navy EOD in accordance with reference (a).

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- Ref: (a) Navy MMR Implementation Policy, SER N457F/452-98, 27 July 1998
(b) NAVSEA OP 5 Volume 1 (Ammunition and Explosives Safety Standards)
(c) NOSSA Instruction 8023. Series
(d) Emergency Planning and Community Right-to-Know Act (EPCRA) 42 USC 11001
(e) NAS Key West Instruction 8026.1 series
(f) NAS Key West Facility Response Plan

1.0 PURPOSE.

The purpose of this SOP is to establish responsibilities and guideline for the management of Waste Military Munitions (WMM) as explosive hazardous waste (EHW) aboard NAS Key West in accordance with the requirements of references (a) through (d). If the WMM may not be managed as conditional exempt from the HW regulations then this SOP shall be use to manage the WMM as EHW.

1.1 Applicability:

The Resource Conservation and Recovery Act (RCRA) authorized the U.S. Environmental Protection Agency (USEPA) to implement Hazardous Waste (HW) management regulations from the point of generation through the final treatment and disposal, that is, "Cradle to Grave." The U.S. Congress waived sovereign immunity for DoD facilities subjecting them to full regulation including assessment of fines and penalties. The USEPA granted the State of Florida authority to implement and enforce HW regulations for identification, packaging, labeling, storing, transporting, disposal and treatment standards. At the request of DoD, the USEPA gave special consideration to WMM with the promulgation of the Military Munitions Rule (MMR).

2.0 DEFINITIONS.

a. Accumulation Start Date.

- (1) Accumulation Start Date at a Satellite Accumulation Area (SAA) is whichever occurs first:

a. The date the total amount of HW stored in the SAA exceeds the 55-gallon limit, or

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b. The date the HW container is picked up from the SAA.

(2) Accumulation Start Date at less than 90-day storage areas:

a. The accumulation start date is the date the first drop or item is placed into the HW container, or

b. The date that a container is moved from a satellite accumulation area (SAA) into the less than 90-day storage area or the HWSF.

b. Characterization. The process of identifying waste constituents, their concentrations, and the work process generating the waste. Characterization is required to identify the USEPA Waste Codes, the Underlying Hazardous Constituents, and the DOT Proper Shipping Name to ensure the waste is properly handled, treated, and disposed.

c. Chemical Munitions. Munitions that contain chemicals that produce lethal or dangerous effects on human health. This does not include riot control agents, chemical herbicides, smoke and other obscuration materials that are further defined in reference (a).

d. Conditional Exemption (CE). Activities that are exempt from the Hazardous Waste (HW) regulations when WMM are managed within the requirements set forth in this exception.

e. Disposition. An evaluation process designed to determine whether munitions are excess, unusable, reusable, recycled, or should be treated and disposed.

f. EPA Hazardous Waste Codes. The specific alphanumeric sequence assigned by the USEPA to specify type and characteristic of a HW.

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- g. Explosive Hazardous Waste (EHW). Waste Military Munitions that are managed as hazardous waste not as conditionally exempt waste military munitions.
- h. Manifest. The shipping document EPA Form 8700-22 (including, if necessary, EPA Form 8700-22A), originated and signed by the generator, that accompanies and is used for tracking the transportation of HW.
- i. Manifest Tracking Number. The alphanumeric identification number pre-printed in Item 4 of the manifest by a registered source.
- j. Military Munitions (MM). All ammunition and their components produced or used by or for the U.S. Department of Defense (DOD) or the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense (DOD), the U.S. Coast Guard (USCG), the U.S. Department of Energy (DOE), and the National Guard.
- k. Transportation. The movement of HM/HW by air, rail, highway, or water.
- l. Transporter. A person engaged in the offsite transportation of hazardous material/waste.
- m. Treatment. Any method, technique, or process designed to change the physical, chemical, or biological character or composition of any HW so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. Treatments include but are not limited to, either physical or chemical extractions, chemical or thermal destruction. The residues from these treatments shall be managed in accordance with regulations.
- n. Underlying Hazardous Constituent (UHC). Any constituent listed in 40 CFR 268.48, which may reasonably be expected to be present at the point of generation of a characteristic hazardous

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waste at a concentration above the constituent-specific Universal Treatment Standards (UTS).

3.0 RESPONSIBILITIES.

3.1 NAS Key West Navy Munitions Command (NMC) Detachment shall:

a. Manage and store WMM/EHW that are being disposed of as HW in accordance references (a), (b), (c) and this SOP.

b. Prepare and submit disposition requests and implement disposition instructions once directed.

c. Obtain required DoD Explosives Safety Board (DDESB) explosive safety site approval(s) for bunkers/magazines used to store WMM/EHW that will be disposed of as HW.

d. Identify and notify NAS Key West Environmental Division what bunkers/magazines will be used to store WMM/EHW **before** placing WMM/EHW into storage.

e. Assist the Environmental Division in determining the explosive characteristics to ensure its explosive classification and charge are properly identified.

f. Conduct and document compliance inspections with the NAS Key West Explosive Safety Officer (ESO), maintain the records and provide a copy of the inspections to the ESO and NAS Key West's Environmental Division.

g. Ensure only trained and authorized personnel enter the WMM/EHW storage bunkers/magazines.

h. Support the ESO in preparing an explosive safety briefing that is presented to all personnel entering the WMM/EHW storage bunkers/magazines.

i. Provide all needed information to complete an EHW determination and profile for the disposal of WMM/EHW via the DLA waste contract.

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j. Ensure appropriate personnel receive WMM/EHW Rule training as required and maintain records of that training.

k. Immediately notify NAS Key West Commanding Officer and the Environmental Division of any loss or theft of WMM/EHW.

l. If necessary, transport WMM/EHW from the HW storage bunker/magazine to a staging area for pickup by the DLA contractor.

3.2 Navy Explosive Ordinance Detachment (EOD) shall:

a. Complete emergency response involving military munitions of any type, both foreign and domestic.

b. Complete emergency disposition as required to protect human life.

3.3 NAS Key West Explosive Safety Officer (ESO) shall:

a. Prepare and submit through appropriate channels documentation of any conflict that occurs between this SOP and references (a), (b) and (c).

b. Support NMC in identifying a bunker/magazine for storage of WMM/EHW.

c. Prepare an explosive safety brief for authorized visitors to WMM/EHW storage bunker/magazine

d. Ensure appropriate personnel receive RCRA training as required by regulations and maintain records of that training for a minimum of three (3) years.

3.4 NAS Key West Environmental Division shall:

a. Serve as liaison to the Florida Department of Environmental Protection (FDEP) regulators for all WMM matters.

b. Support NAS Key West ESO's in resolving any conflict between this SOP and reference (a), (b) and (c).

c. Provide verbal notification to the FDEP within 24 hours and the follow up written notification to FDEP within 5 days of

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any loss, theft or violation of the storage standards, Department of Transportation (DOT) or DoD standards or policies that may pose a threat to human health or the environment.

d. Accompany personnel from the FDEP during inspections of WMM/EHW storage bunker/magazine.

e. Verbally notify FDEP within 24 hours and provide written notification within 5 days of any unpermitted or uncontrolled detonation, release, discharge or migration of WMM/EHW from any storage unit that may endanger human health or the environment.

f. Ensure compliance with EPCRA emergency response requirements and complete required notifications to responsible agencies, e.g. State of Florida and USEPA.

g. Support NMC, EOD, and DLA in preparing the required documents and manifest to ensure the safe shipment off site or the thermal treatment of WMM/EHW.

h. Assist the NMC with WMM/EHW storage bunker/magazine inspections.

i. Assist and train NMC personnel in the proper storage, labeling, packaging, transportation, and manifesting requirements and other regulatory requirements for the shipment of WMM/EHW offsite to a RCRA permitted facility.

j. Ensure appropriate personnel receive HW training and maintain training records for a minimum of three (3) years.

k. Coordinate the closure of bunkers/magazines that stored WMM/EHW disposed of as HW.

3.5 NAS Key West Public Works Department shall:

a. Ensure DLA maintains a contract for the proper disposal of WMM/EHW in accordance with EPA and DOT regulations.

3.6 Defense Logistics Agency (DLA) EHW Disposal Office shall:

a. Ensure all DOT requirements are met by their contractor when transporting WMM/EHW.

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b. Ensure regulatory notifications are made and approvals received, if required, including transportation route approval before scheduling a pickup of the WMM/EHW.

c. Ensure physical security, if required, is provided during the transportation of EHW.

d. Ensure the transporter is licensed, permitted, and knowledgeable of the requirement when transporting EHW.

e. Ensure that the transporter has an adequate Security Plan.

f. Ensure proper labeling, markings and placarding of containers and trucks.

g. Ensure the manifest is accurate and reflects the EHW that is being transported.

h. Ensure the TSD receiving the EHW is permitted to receive and treat the EHW.

4.0 GENERAL REQUIREMENTS.

WMM/EHW and their components that cannot be managed under the Conditionally Exempt (CE) regulation, 40 CFR 266.200, shall be managed in accordance with this SOP. Failure to properly manage WMM/EHW or their components subjects NAS Key West to fines and penalties.

a. Federal and Florida HW regulations require NAS Key West to determine if WMM are hazardous waste then track the WMM/EHW from the point of generation through final disposal.

b. If this SOP conflicts with explosive safety requirements, utilize the guidance set forth in reference (b) until a resolution is found. The NMC, Public Works Officer, Installation Environmental Program Director, and the ESO shall immediately identify and resolve a conflict using the process in reference (a).

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c. Enclosure (F-1) is a schematic to assist in determining if a MM is a WMM and the proper disposal requirements.

5.0 WASTE DETERMINATION (DISPOSITION PROCESS).

The Navy Designated Disposition Authority (DDA) determines whether a MM is to be used, recycled, repaired, treated or disposed of.

a. If the MM is a waste, the DDA will provide NMC specific instructions for either local treatment or for the timely shipment to a RCRA permitted treatment facility.

5.1 Military Munitions Are Not a Waste When:

Unused MM are **NOT** WMM when:

- a. Used in training; **or**
- b. Used in Research, Development, Test, & Evaluation (RDT&E); **or**
- c. Recovered, collected and destroyed on-range during range clearance operations at active or inactive ranges; **or**
- d. Unused munitions (including subcomponents) when repaired, reused, or recycled, reclaimed, disassembled, reconfigures or otherwise subjected to materials recovery activities.
- e. When removed from a range for the purpose of:
 - (1) Evaluation and testing. However, when the required evaluation or test is completed any remaining munitions or components become WMM and subject to HW requirements.
 - (2) Repair or reuse. Used MM removed from a range for repair, reuse or an evaluation that includes a determination of whether or not the munitions is repairable or reusable are not WMM. MM that cannot be repaired or reused is WMM/EHW

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5.2 Military Munitions are Waste when:

5.2.1 Unused MM are waste when:

- a. Abandoned by being disposed, burned, detonated, incinerated or treated prior to disposal; **or**
- b. Removed from storage for the purpose of disposal, burning, incinerating or treatment prior to disposal; **or**
- c. Deteriorated or damaged to the point that it cannot be put into a serviceable condition and cannot reasonably be recycled or used for other purposes; **or**
- d. Declared a waste by an authorized military official.

5.2.2 Used MM are a Waste (Used or fired MM) when:

- a. Transported off-range for storage, reclamation, treatment or disposal; or

NOTE: Firing-range scrap metal including expended brass and mixed metals generated through firing-range clearance are excluded from the definition of solid waste therefore, are excluded from regulation if recycled as scrap metal.

- b. The MM is fired off-range and not promptly rendered safe and/or retrieved (see ref (a)).

Note: Chemical munitions (smokes, obscurants, and riot control agents are NOT included in the definition of chemical weapons or agents).

6.0 WMM/EHW STORAGE.

- a. Items determined via the disposition process or MM that are by definition WMM/EHW shall be stored in a bunker/magazine that meets the requirements as specified in references (a), (b), and (c).

- b. WMM/EHW shall be stored in approved bunkers/magazines that meet all safety requirements and are subject to the following conditions:

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- (1) The WMM/EHW must be stored under the jurisdiction and in accordance with the DoD Explosives Safety Board (DDESB) standards.
- (2) The magazines are approved as DDESB explosives safety sites and that documentation is available.
- (3) The FDEP shall be provided required notices including immediate notification of any loss or theft of WMM/EHW, or violations of DDESB standards that endanger human health or the environment.
- (4) Access is limited to trained authorized personnel.

Note. Only FDEP personnel briefed on explosives safety may gain access to inspect the EHW but only while being escorted by qualified NMC and Environmental Division personnel.

c. The same bunker/magazine may be used to store other munitions if:

- (1) Compliant with the explosive safety requirements.
- (2) The WMM/EHW are stored on separate pallets.
- (3) The WMM/EHW are labeled and marked.

6.1 WMM/EHW Storage Type:

There are only two types of EHW storage; Satellite Accumulation Areas (SAA) or less than 90-day storage areas. SAAs are the least regulated; however, the conditions identified in Section 6.1.1 must be met; if the conditions are not met then EHW must be storage in less than 90 day storage areas, Section 6.1.2.

6.1.1 Satellite Accumulation Areas (SAA)

SAAs are initial accumulation areas at or near the point of generation, under the control of the operator generating the waste and where less than 55 gallons of HW or 1 quart of acute HW may be accumulated at any one time. If these requirements are met, then a SAA in a bunker/magazine may be established to store WMM/EHW.

The minimum requirements for SAA:

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a. Signs required by the ESO must be posted on the outside of the magazine containing a SAA.

b. The SAA shall be approved by NAS Key West HW Manager.

(1) Approval shall be gained prior to WMM/EHW being stored in the bunker/magazine.

(2) Each SAA must have a unique identification number assigned by the NAS Key West HW Manager.

c. Inside the magazine the SAA shall be clearly delineated.

6.1.2 Less than 90-Day Storage Area

Unlike a SAA there is no limit on the amount of WMM/EHW that may be stored; however, the WMM/EHW may not be stored more than 90-days.

The requirements for less than 90-day storage include:

a. Access shall be controlled at all times (e.g. keep area locked except when the staff is present).

b. Weather resistant signs shall be posted and clearly visible from a distance of 50 feet on all exterior sides of the magazine stating

"NO SMOKING WITHIN 50 FEET"

c. Have weather resistant signs posted and clearly visible from a distance of 25 feet reading

"DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"

and

"HAZARDOUS WASTE STORAGE AREA"

d. Sufficient aisle space around containers or pallet shall be maintained to allow for the unobstructed movement of personnel.

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e. Position each container so that the label is clearly visible when approaching for an inspection.

f. Have containers stored so there is unobstructed access, i.e. nothing stored in front of the containers.

g. An internal communication device capable of summoning emergency assistance is required.

6.2 Container Management:

Containers shall be in good condition (only minor surface rust or dents) and compatible with the WMM/EHW stored in them.

a. NAS Key West Environmental Division will provide approved containers.

b. Containers shall be properly closed except when adding waste.

c. Containers that cannot be properly sealed shall:

(1) Have the contents transferred to a proportionally sized container, or

(2) With guidance from NAS Key West HW Manager, over-packed into an appropriate size container.

d. The container must be closed to the manufacturer's specification and a log with those specifications maintained.

e. When WMM/EHW is transported offsite to a permitted disposal facility a copy of the container closure specifications shall accompany the container and a copy retained by NAS Key West HW Manager.

6.3 Container Labeling:

Properly complete each HW label using indelible ink.

a. The minimum information that must be on the container include:

(1) The words "Hazardous Waste",

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- (2) The contents of the container, and
- (3) The accumulation start date.

b. Additional information on each container includes:

- (1) Name and address of the Installation.
- (2) Name of the Generating Unit.
- (3) USEPA Generator ID Number.
- (4) DOT Warning Labels and Marking.

6.4 Inspections:

The WMM/EHW accumulation/storage areas shall be inspected, at a minimum, once a week using the inspection sheet shown in enclosure (F-2).

a. A copy of the inspection sheet shall be forwarded NAS Key West HW Manager not later than Tuesday of the following week.

b. The original shall be retained by NMC for a minimum of three years.

6.5 Record Keeping:

Records must be maintained and available for review by Navy personnel, FDEP and USEPA upon request.

a. Written records of all WMM/EHW stored shall be maintained for 3 years from the date inventoried, inspected, or removed. These records shall contain the following information:

- (1) The type of WMM/EHW stored by standard nomenclature, lot number, Federal Supply Class (FSC), National Stock Number (NSN), Department of Defense Ammunition Code (DODAC), Navy Ammunition Logistics Code (NALC), and material condition code.
- (2) The quantity of each type of WMM/EHW stored.
- (3) The date that each MM, by type, was identified as a waste.

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- (4) The last storage date (i.e., date removed from storage) for each, by type, of WMM/EHW.
- (5) The storage location or locations.
- (6) The disposition (e.g., destroyed, demilitarized, shipped) and date of the action, by type of the WMM/EHW.
- (7) The marking and labeling requirements identified by the DOT administrator if applicable.
- (8) The name of the permitted transporter who transported the WMM/EHW offsite.
- (9) The name of the offsite RCRA permitted facility where the WMM/EHW was shipped.

7.0 SHIPMENT OF WMM/EHW REGULATORY REQUIREMENTS.

a. The shipment of WMM/EHW shall comply with all USEPA and DOT regulations and requirements.

b. The DOT Hazardous Material Rule prohibits the transportation of an explosive unless it has been examined, classed, and approved by Pipeline Hazardous Material Safety Administration (PHMSA) Associate Administrator for Hazardous Materials Safety (49 CFR 173.51). Separate provisions apply to the transportation of new explosives for examination or developmental testing, explosives approval by a foreign government, small arms cartridges, and fireworks manufactured in accordance with American Pyrotechnics Association Standard 87-1 (49 CFR 173.56).

c. Each approval granted by the Associate Administrator contains packaging and other transportation provisions (e.g., shipping paper requirements, labeling, marking, etc.) that must be followed by NAS Key West personnel who offers and DLA's contractor who transports the explosive material.

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d. In addition to the specific requirements in the approval, the HMR require explosives to be marked and labeled and/or placarded to indicate the explosive hazard.

e. Explosives shipments must be accompanied by shipping papers and emergency response information. The same requirements apply to the transportation of HM whether the materials are incidentally stored or actually moving.

f. When WMM/EHW are offered for transportation or transports in commerce in types or amounts that requires placarding they must (1) register with PHMSA and (2) develop and adhere to a security plan (49 CFR 172.800(b)).

g. The DLA transporter's security plan must include an assessment of possible transportation security risks and appropriate measures to address the identified risks including measures to prevent unauthorized access to shipments and to address personnel and en-route security (49 CFR 172.802(a)). The en-route security element of the plan must include measures to address the security risks of the shipment while it is moving from its origin to its destination, including shipments stored incidental to movement (49 CFR 172.802(a)(3)).

h. Any facility at which a shipment is stored during transportation must itself be covered by the security plan.

i. It is the responsibility of the DLA to ensure their transporters meet or exceed the DOT requirements.

7.1 Shipment Procedures:

The NAS Key West HW Manger shall notify DLA that there are EHW to be manifested to a permitted HW Treatment, Storage, and Disposal (TSD) facility by a permitted and licensed transporter in accordance with DOT regulations.

a. Working with the NAS Key West HW Program Manager and the NMC/EOD/ESO shall provide the information needed by DLA to ensure the WMM/EHW are properly identified and classified as required by RCRA and DOT.

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- (1) On the day of the pickup, stage the WMM/EHW for pickup by the DLA contractor.
- (2) Ensure WMM/EHW are properly labeled and marked.
- (3) Ensure WMM/EHW are properly loaded and braced by the contractor.
- (4) Ensure all DOT and RCRA paper work is in place before WMM/EHW are transported off the installation.

8.0 DISPOSAL WMM AS EHW.

Disposal of WMM as EHW shall be completed via DLA contractors. A certificate of disposal shall be provided to the NAS Key West by DLA.

9.0 COMPLIENCE WITH THE FACILITY RESPONSE PLAN.

NMC, EOD and ESO will ensure compliance with the Facility Response Plan/Emergency Response Plans references (d) and (f). At a minimum:

a. Maintain specific emergency preparedness, contingency planning, and security.

b. Minimize unpermitted or uncontrolled detonation, releases and discharges of WMM/EHW that may endanger human health or the environment.

c. Immediately notify NAS Key West Command Duty Officer and the Installation Environmental Program Director in the event of an actual or potential detonation or uncontrolled release, discharge or migration of WMM/EHW that may endanger human health or the environment.

9.1 Emergency Response:

Emergency response aboard NAS Key West shall be conducted by NMC/EOD in accordance with reference (a).

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Emergency responses during the transportation offsite of the EHW are the responsibility of DLA and their contractor.

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Enclosure (F-1)

Munitions Rule Evaluation Process

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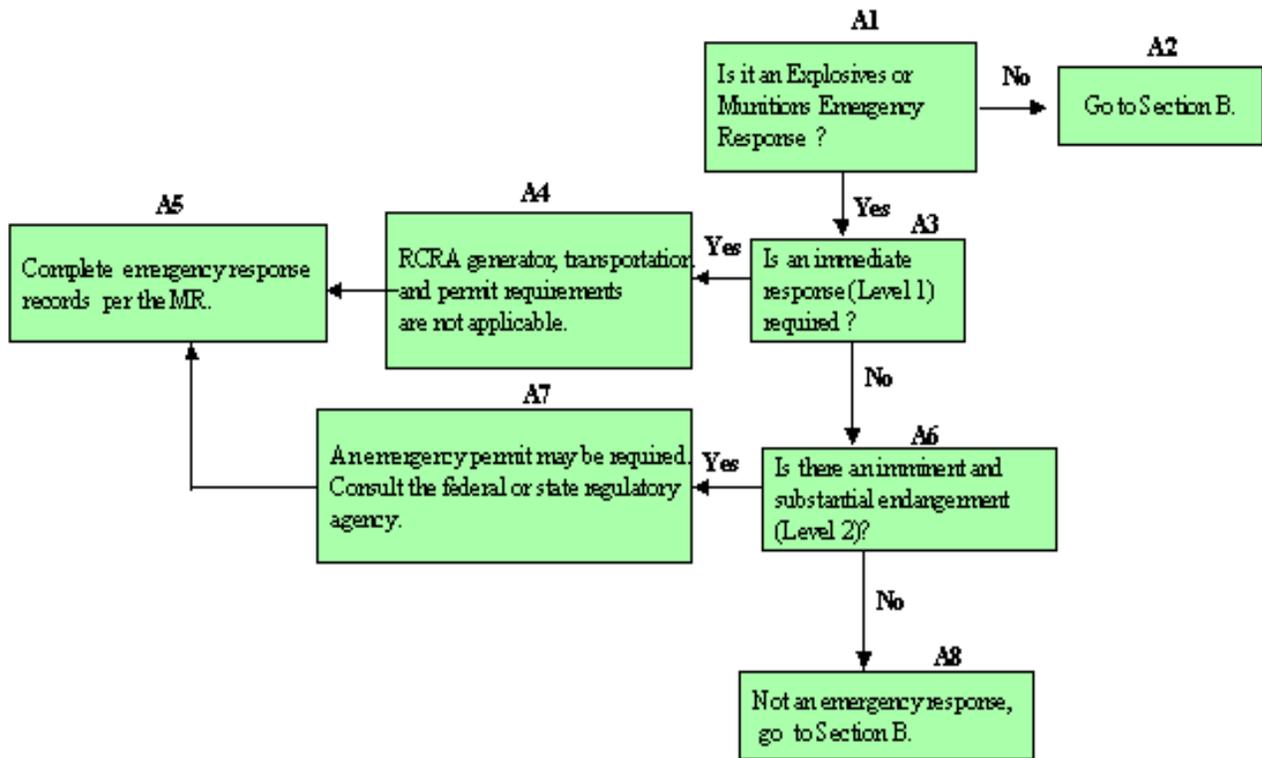
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Waste Military Munitions
Munitions Rule Evaluation Process**

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Munitions Rule Evaluation Process Schematic

The following flow chart visually depicts the process to determine when military munitions (MM) become waste military munitions (WMM), general guidance and is the tool used for implementing the DoD Munitions Rule Implementation Policy (MRIP)(reference (a)) and this HWMP.

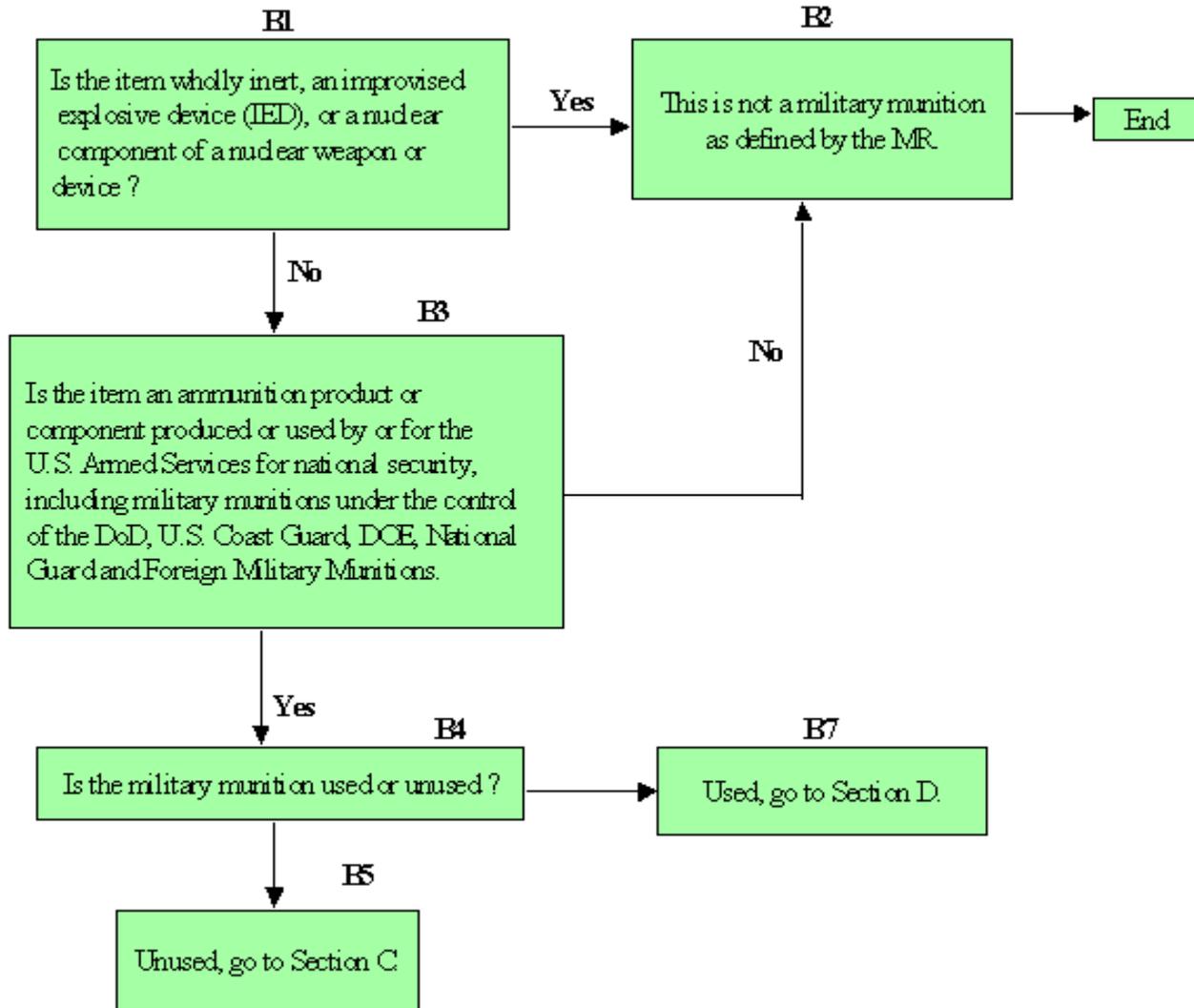
A. Emergency Response (MRIP Chapter 9)



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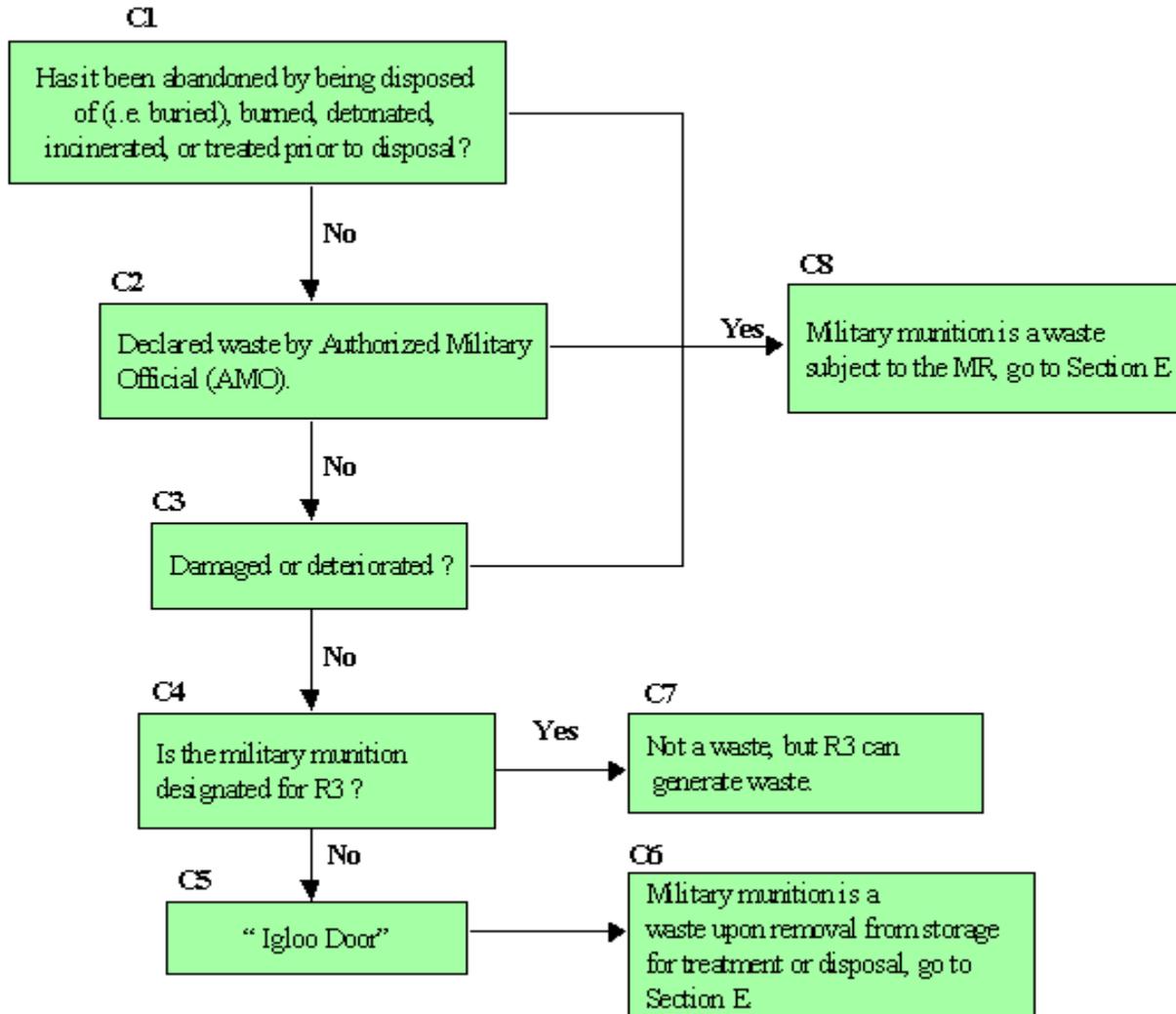
B. Is it a Military Munitions? (MRIP Chapter 2)



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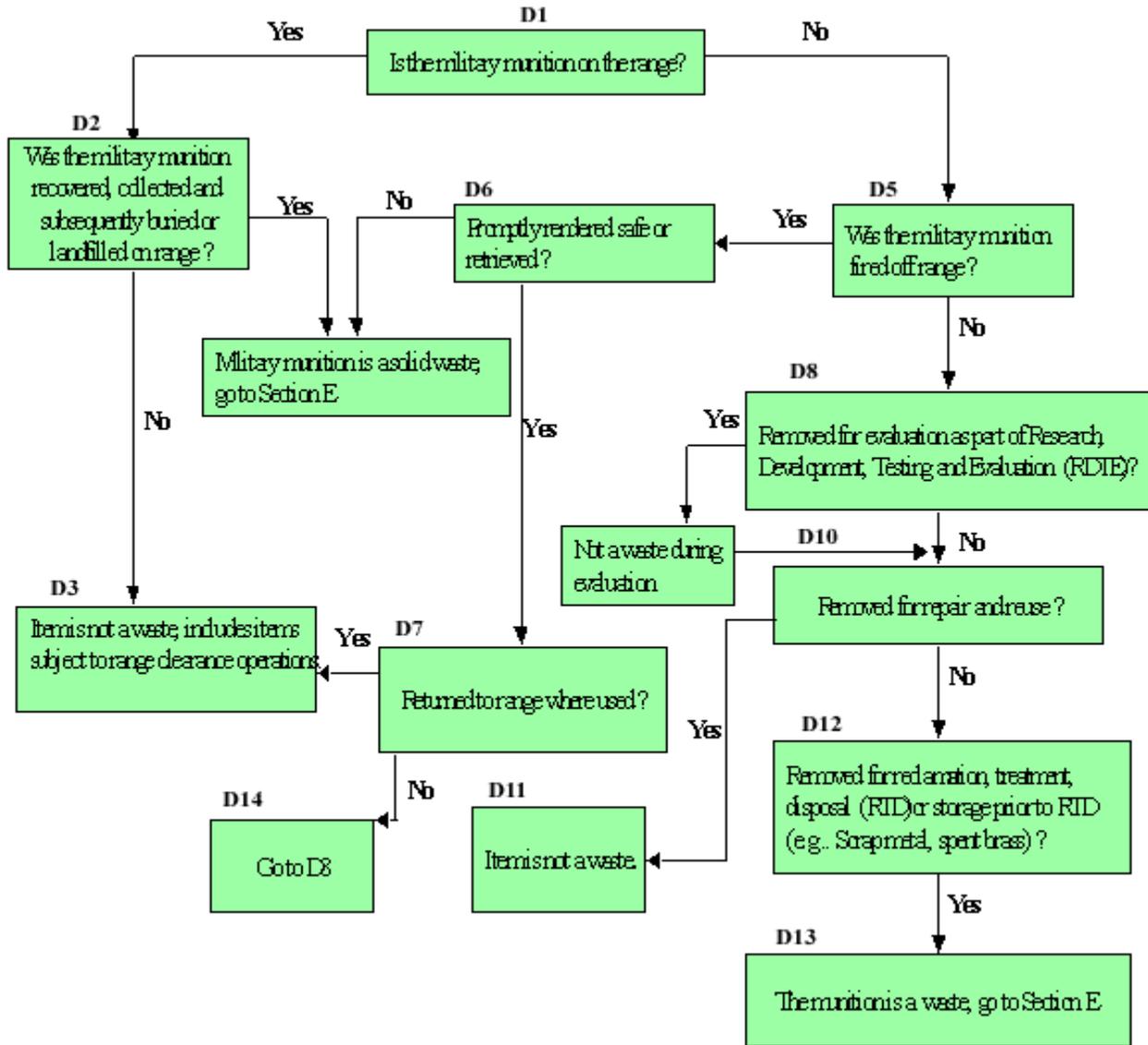
C. Are the unused Munitions a Waste? (MRIP Chapter 4)



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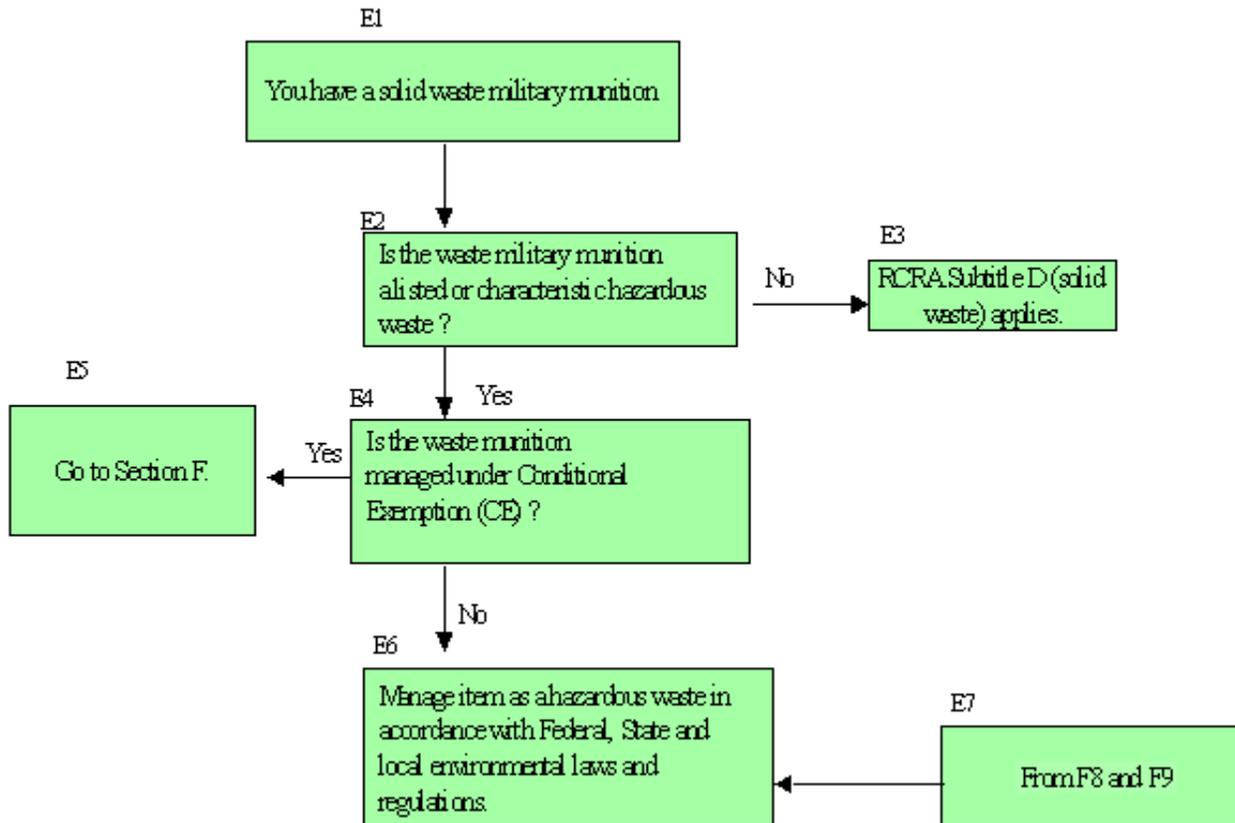
D. Are the used Munitions a Waste? (MRIP Chapter 5)



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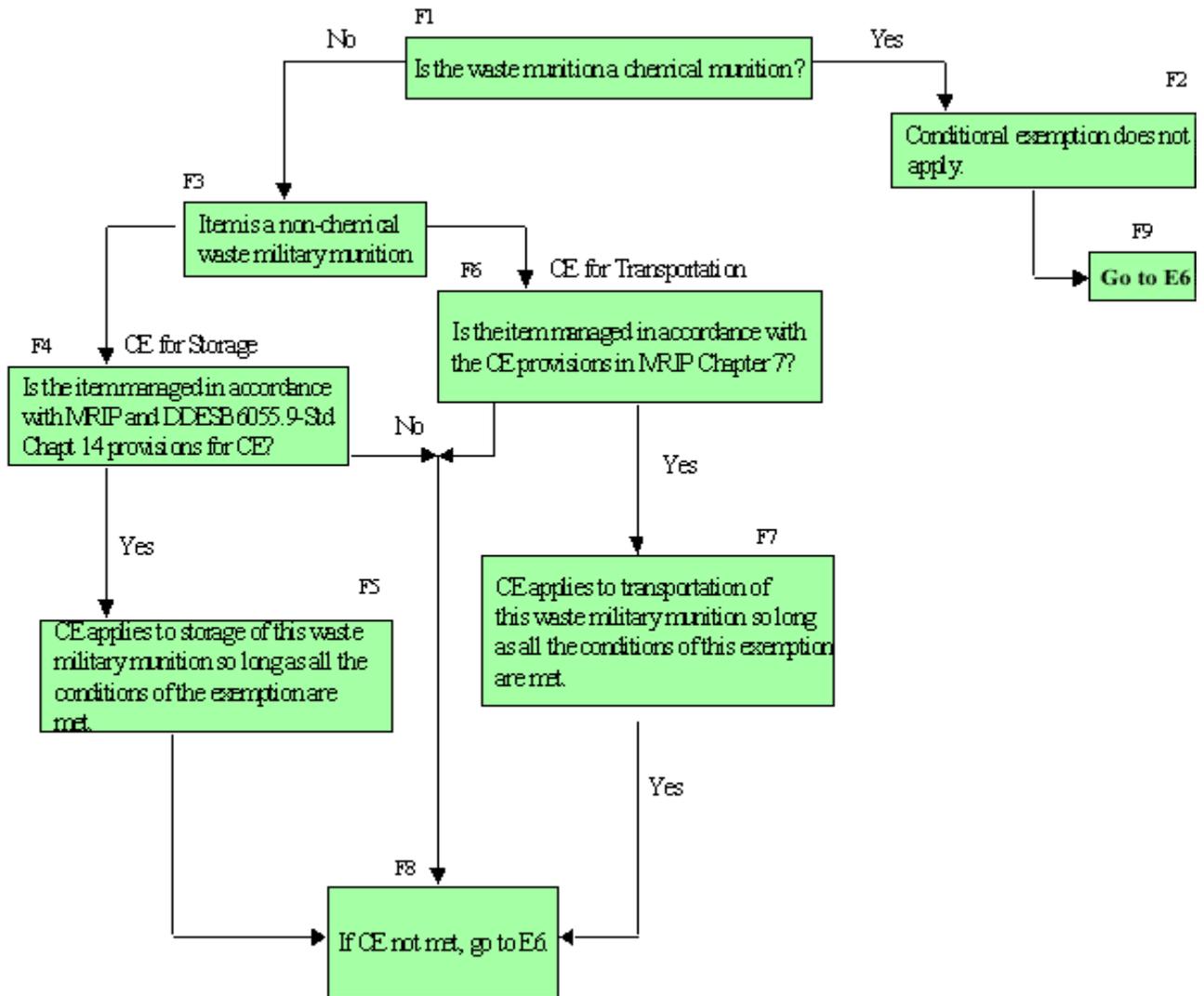
E. Waste Determination (MRIP Chapter 7)



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F. Conditional Exemption (MRIP Chapter 7)



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Enclosure (F-2)

Inspection Sheets

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**NAS Key West
SATELLITE INSPECTION FORM**

Command: _____ Department: _____ SAA ID: _____

HW Coordinator: _____ Date: _____ Time: _____

- Has NASKW, in writing, approved this SAA? Sat Unsat
- Is the Satellite at or near the point of generation and under the control of the generator? 40 CFR 262.34 Sat Unsat N/A
- Is there less than 55 gallons of HW accumulated? 40 CFR 262.34 Sat Unsat N/A
- Is the SAA clearly identified? 40 CFR 262.34 Sat Unsat N/A
- Are the SAA physical boundaries defined 40 CFR 262.34 Sat Unsat N/A
- Are containers properly labeled (HW, Used Oil, etc.)? 40 CFR 262.34 Sat Unsat N/A
- Are containers in good condition? 40 CFR 265.171 Sat Unsat N/A
- Are containers closed? 40 CFR 265.173 Sat Unsat N/A
- Are containers stored to prevent ruptures or leaks? 40 CFR 265.173 Sat Unsat N/A
- Are Universal Waste Containers dated? 40 CFR 173.15 Sat Unsat N/A
- Are the containers closed? Sat Unsat N/A
- Are batteries separated by type? Sat Unsat N/A
- Are the battery terminals taped? Sat Unsat N/A
- Is the waste stored with compatibles? 40 CFR 265.172 Sat Unsat N/A
- Are waste determination completed for each waste? 40 CFR 262.11 Sat Unsat N/A
- Is log book correctly format and maintained? Sat Unsat N/A
- Are the personnel who handle HW trained? 40 CFR 262. Sat Unsat N/A
- Is the housekeeping in the SAA in good order? Sat Unsat N/A

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW only)

Date of oldest UW: _____ Total Gallons of HW: _____

Discrepancies: _____

Corrective Action: _____

Transfer Information: Number of Drums _____ Manifest Number _____

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____ Signature: _____ Date: _____

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**NAS Key West
Hazardous Waste Inspection Form
90-Day Accumulation Areas**

Building/Location: _____

Date: _____

Accumulation Site: _____

Time: _____

Are containers properly labeled HW/UW/Used Oil?	40 CFR 262.34	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are HW / UW containers dated?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the Contingency Plan posted?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are "No Smoking", "Danger" and "HW Storage" signs posted?	40 CFR 264.17	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the area fenced in, locked and bermed to prevent the release of HW?	40 CFR 265.31	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is fire equipment available and maintained?	40 CFR 265.32	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is a spill kit available and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there an eye wash directly accessible?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is there access to a telephone or radio for Emergency calls?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is aisle space adequate? (30"minimum)	40 CFR 265.35	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers in good condition?	40 CFR 265.171	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is waste compatible with container?	40 CFR 265.172	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers closed?	40 CFR 265.173	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are containers stored to prevent ruptures/leaks?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Are weekly inspections documented?	40 CFR 265.174	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is the waste stored with compatibles?	40 CFR 265.177	<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is housekeep in good order		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Is logbook in the correct format and maintained?		<input type="checkbox"/> Sat	<input type="checkbox"/> Unsat
Number of HW Containers?	Oldest Date:	Number of UW Container?	Oldest Date:

Discrepancies: _____

Corrective Action: _____

Current Waste Inventory

Drum Size	Waste Description and Profile Number	Accumulation Date (UW)

Transfer Information: Number of Drums Manifest Number

Drum Number	Waste Description/Profile Number	Date	Initials

Print Name: _____

Signature: _____

Date: _____

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