DEPARTMENT OF HOMELAND SECURITY
FEDERAL LAW ENFORCEMENT TRAINING CENTERS

FLETC DIRECTIVE NO:	025-01 (Formerly 025-001)
DIRECTIVE TITLE:	FLETC Hazardous Waste Management Plan
EFFECTIVE DATE:	April 12, 2018

I. POLICY: Federal Law Enforcement Training Centers (FLETC) comply with all federal and applicable local regulations, industry standards, and FLETC plans with respect to the classification, management, transport, storage, and disposal of hazardous material and/or hazardous waste.

II. SCOPE: This directive is in effect at all FLETC locations and applies to FLETC staff, Partner Organization (PO) staff, and contractor or subcontractor personnel at all FLETC Training Delivery Points.

III. REFERENCES:

A. 40 CFR Parts 260 – 273 (Hazardous Waste).

B. 40 CFR Part 279 (Standards for the Management of Used Oil).

C. 29 CFR 1910.1200 (Hazard Communication).

D. 49 CFR Parts 100 – 180 (Hazardous Material and Oil Transportation).

E**.** 42 U.S. Code, Chapter 82, Subchapter III (Hazardous Waste Management).

F. Public Law 94-580, October 21, 1976, [Resource Conservation and Recovery Act (RCRA)].

G. Department of Homeland Security (DHS) Directive 023-02 (Environmental Compliance Program).

IV. CANCELLATION: None.

V. ADDITIONAL GUIDANCE: FLETC Manual 025-01 (Formerly 025-001), FLETC Hazardous Waste Management Plan.

VI. OFFICE OF PRIMARY INTEREST: Environmental and Safety Division, Mission and Readiness Support Directorate.

Signature on File

Thomas J. Walters
Director

POST PUBLICATION
Revision History
FD/FM 025-01(Formerly 025-001)

Date	Revision Request By:	Summary of Revisions	Revisions Made By:
3/24/2021	Directives and Policies Program (DPP)	DPP changed the directive numbers to be in compliance with the BRM/LOB numbers provided by CIO. And consistent with the numbering. This directive was 025-001 - changed to 025-01	C. Haney

POST PUBLICATION
Revision History
FM 025-001

Date	Revision Request By:	Summary of Revisions	Revisions Made By:
7/11/19	Terri Mason, ESD, via email	Due to changes in federal regulations and State and FLETC personnel, I need to make minor changes to FLETC Directive 025-001, FLETC Hazardous Waste Management Plan. The changes are as followed: • Section V – Responsibilities – E – #3: Added an "a" after utilizing • Section V – Responsibilities – E – #4: Deleted "at a minimum" and added "according to State regulations" • Section V – Responsibilities – E – #4: Added an "a" after utilizing • Attachments 1 and 9 – Added the word (Example) to both at the top right • Attachment 13 (FLETC Glynco's Hazardous Waste Contingency Plan) – Updated Exhibits 2, 4, 11 and 13 o Exhibit 2: Emergency Response Coordinator Contact List – Deleted Mark Harvison's information o Exhibit 4: Emergency Reporting Form – Updated State personnel emails. o Exhibit 11: GA EPD Contact List – Updated State personnel and phone numbers.	C. Haney

FLETC MANUAL 025-01 (Formerly 025-001)

HAZARDOUS WASTE MANAGEMENT PLAN

Supporting Publication to FLETC Directive 025-01
(Formerly 025-001) Hazardous Waste Management

April 2018

FLETC MANUAL 025-01 (Formerly 025-001)

HAZARDOUS WASTE MANAGEMENT PLAN

TABLE OF CONTENTS

I. INTRODUCTION:

A. This Hazardous Waste Management Plan (HWMP) addresses the mandatory requirements promulgated by 40 CFR Parts 260 through 268, United States Environmental Protection Agency (EPA) and State (Georgia, Maryland, New Mexico, and South Carolina) regulations for the management and disposal of hazardous waste (HW) at all Federal Law Enforcement Training Centers (FLETC). The HWMP provides guidelines for the safe handling of hazardous materials from point of generation to the point they become HW to their ultimate disposal. The HWMP promulgates applicable requirements related to HW and universal waste management, including responsibilities, HW and universal waste classification procedures, HW and universal waste accumulation procedures, FLETC Waste Analysis Plan, HW and universal waste disposal procedures, training, contingency plan measures, and FLETC Waste Minimization Plan.

B. This Manual also describes reporting and other HW program interface requirements for all activities located within FLETC's complex.

C. The HWMP has a five-year review cycle and will be updated as needed.

II. SCOPE: Unless otherwise specified, the HWMP applies to all FLETC staff, Partner Organization (PO) staff, and contractor or subcontractor personnel at all FLETC Training Delivery Points.

III. FORMS: See Attachments.

IV. DEFINITIONS:

A. Acquisition - Acquiring, by contract with federal funds, supplies or services (including construction) by, and for the use of, the federal government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation, and selection of sources, award of contracts, contract financing, contract performance, contract administration, and those technical and management functions directly related to the process of fulfilling agency needs by contract.

B. Chemical - Any element, compound, or mixture of elements and/or compounds.

C. Chemical Manufacturer - An employer with a work place where chemicals are produced for use or distribution.

D. Combustible Liquid - Any liquid having a flashpoint at or above 100 degrees Fahrenheit. Where the term "combustible" is used it shall pertain only to those with flashpoints at or above 100 degrees and below 200 degrees Fahrenheit.

E. Conditionally Exempt Small Quantity Generator (CESQG) - A generator who generates 100 kilograms (220.46 lbs.) or less per month of HW in a calendar month. See 40 CFR 261.5.

F. Consumer Product - A product or hazardous substance where the employer

can demonstrate how it is used in the workplace in the same manner as normal consumer use and which results in a duration and frequency of exposure which is not greater than exposures experienced by consumers.

G. Container - Any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical.

H. Corrosive - A liquid or solid that causes visible destruction or irreversible alterations of human skin tissue at the site of contact or, in the case of leakage from its packaging, a liquid that has a severe corrosion rate on steel. Acids have a pH of 6.9 to 1 and bases have a pH of 7.1 to 14; 7 is neutral.

I. Designated Facility - a treatment, storage, or disposal facility that is permitted and designated to receive a specific HW shipment manifested by the generator.

J. Discharge or HW Discharge - the accidental or intentional spilling, leaking, pumping, pouring, emitting, emptying, or dumping of HW on land or into waters.

K. DOT - The U.S. Department of Transportation.

L. Employee - A worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers who encounter hazardous chemicals only in non-routine, isolated instances are not included.

M. Employer – An entity engaged in a business where chemicals are either used, distributed, or produced for use or distribution, including a contractor or subcontractor.

N. EPA Identification Number - The number assigned by the EPA to each HW generator, transporter, or facility.

O. EPA HW Number - The number assigned to each HW listed in 40 CFR 261.

P. EPA - The U.S. Environmental Protection Agency.

Q. Excess Hazardous Materials (EHM) - Ready for issue hazardous material, classified as hazardous material, and no longer needed by the activity having custody of the material.

R. Explosive - A chemical that causes a sudden, almost instantaneous, release of pressure, gas, and heat when subjected to sudden shock, pressure or high temperature.

S. Exposure or Exposed - When an employee contacts a hazardous chemical in the course of employment through any route or entry (inhalation, ingestion, absorption, injection). Includes potential (e.g. accidental or possible) exposures.

T. Flammable Solid - A solid material, other than one classed as an explosive, which is liable to cause fire through friction, absorption of moisture, spontaneous chemical change or retained heat from manufacturing or processing, or which can be ignited readily and when ignited can burn so vigorously and persistently as to create a serious hazard.

U. Flammable Liquid - A liquid with a flash point less than 100 degrees Fahrenheit.

V. Flash Point (fp) - The minimum temperature at which a substance gives off flammable vapors which, in contact with a spark or flame, will ignite.

W. Generating Activity (or HW Generating Activity) - any shop, laboratory, or process where waste or HW is generated.

X. Generator - any entity or individual whose actions or processes produces HW identified or listed in 40 CFR 261 or whose actions cause a HW to become subject to those regulations.

Y. Hazard Warnings - Any words, pictures, symbols, or combination thereof appearing on a label, or other appropriate form of warning, which conveys the hazards of the chemicals in a container, including target organ effects.

Z. Hazard Communication (HAZCOM) - A phrase and acronym derived from 29 CFR 1910.1200, the OSHA Hazard Communication Standard, that, when used as a noun or adjective, means a requirement related to the standard. The performance elements of the standard involve the following: a list of hazardous chemicals, Safety Data Sheets (SDSs), labels, other forms of warning, personnel training, non-routine tasks, contractor employers and employees, personnel accessibility to a list of chemicals and SDSs, and a HAZCOM program plan.

AA. Hazardous Chemical - Any chemical that is a physical hazard or health hazard per 29 CFR 1910.1200(c), and with some exceptions as specified in the Community Right to Know Law of 1986 (Superfund Amendments and Reauthorization Act (SARA), Title III). See hazardous material.

BB. Hazardous Waste (HW) - In general, this includes hazardous material (HM) which have no further use and exhibit characteristics of ignitability, corrosiveness, reactivity, and/or toxicity, or are defined as such in federal and state HW regulations. HW may also be known as a Regulated Substance.

CC. Hazardous Material (HM) - Any substance or material, including a hazardous substance, which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may pose a hazard to human health or the environment. As a minimum, includes all material regulated by Title 49 CFR 173.2, Title 29 CFR 1910.1200, Title 40 CFR 261. HM at FLETC may also be termed a Regulated Substance.

DD. Hazardous Substance - Hazardous materials and hazardous wastes. Hazardous Substance at FLETC may also be known as a Regulated Substance (RS).

EE. Hazardous Waste Minimization (HAZMIN) - Consists of three parts:

1. Avoiding HW generation by minimizing and controlling HM acquisition and use, and by applying best management, engineering and equipment to FLETC processes and procedures.

2. Recycling HW to return it to a ready-for-use state.

3. Treating HW to reduce the volume or to reduce it to a non-hazardous state.

FF. HW Management - the systematic control of the generation, collection, source separation, storage, transportation, processing, treatment, recovery, and disposal of HW.

GG. Label - Any written, printed, or graphic material, displayed on, or affixed to, containers of hazardous materials or waste.

HH. Large Quantity Generator (LQG) - A generator who generates 1,000 kilograms (2,204 lbs.) or more of HW in a calendar month. See 40 CFR 262.34(a).

II. Manifest - the document originated and signed by the generator which contains the information specified by 40 CFR 262 Subpart B.

JJ. Marking – a descriptive name, identification number, instructions, cautions, weight, specification, or UN marks, or combinations thereof, required by 49 CFR 171.8 on outer packaging of hazardous materials.

KK. Originator - Anyone producing a hazardous or industrial waste.

LL. OSHA – U.S. Occupational Safety and Health Administration.

MM. Oxidizer - A substance that readily yields oxygen to stimulate the combustion of organic matter.

NN. Ozone Depleting Substance (ODS) - Chlorofluorocarbons and halons that have been linked to the depletion of the Earth's ozone layer. These include, but may not be limited to: 1,1,1 Trichloroethane (methyl chloroform); Freon 11 (Trichlorofluoro-methane); Freon 12 (Dichlorodifluoromethane); Freon 13 (Chlorotrifluoromethane); Freon 22 (Chlorodifluoromethane); Freon 113 (Trichlorotrifluoroethane); Freon 114 (Dichlorotetrafluoroethane); Freon 115 (Chloropentafluoroethane); Freon 500 (Dichlorodifluoromethane/Difluoroethane); Freon 502 (Chlorodifluoromethane/ Chloropenta-fluoroethane); Halon 1211 (Bromo-chlorodifluoromethane); Halon 1301 (Bromotrifluoromethane): Halon 2402 (Dibromotetrafluoro-ethane); Methylene Chloride.

OO. Pesticide - Pesticides are insecticides, herbicides (including desiccants, defoliants and growth regulators), rodenticides, acaricides, avicides (bird control materials), nematocides, fungicides, algicides, molluscicides and repellents, and attractants; or any combination thereof; or any other material used for the purpose of controlling, preventing or mitigating pest organisms.

PP. Purchase/Procurement - See acquisition.

QQ. Safety Data Sheets (SDS) - Written or printed information concerning a hazardous chemical which is prepared on OSHA Form 174 or equivalent. The SDS must be used by manufacturers, suppliers or other responsible party to communicate to users the chemical, physical and hazardous properties, and safety procedures for their product.

RR. Small Quantity Generator (SQG) - A generator who generates more than 100 kilograms (220.46 lbs.), but less than 1,000 kilograms (2,204 lbs.) of HW in a calendar month. See 40 CFR 262.34(d).

SS. Universal Waste (UW) - Waste which the EPA has specifically identified in order to reduce the amount going to landfills/incinerators, including: batteries, recalled and unused pesticides, mercury-containing equipment, and mercury lamps.

TT. Very Small Quantity Generator (VSQG) - see Conditionally Exempt Small Quantity Generator (CESQG)

UU. Waste Information Document (WID) - The WID is the central recording and permitting document for all regulated substance disposal transactions. It includes directions for handling, disposal, and transportation and contains authorizing and certifying signatures. FLETC WIDs may be found on the ESD MOSS site under Public Documents/Hazardous Waste Program.

VV. Work Area - A room or defined space in a workplace, indoors or outdoors, where hazardous chemicals are produced or used and where employees are present.

WW.Workplace - An establishment, job site or project, at one geographical location, containing one or more work areas. Title 29, Code of Federal Regulations (CFR), 1992 rev, Part 1910 General Industry Standards.

V. RESPONSIBILITIES:

A. Environmental and Safety Division (ESD)/Environmental and Safety Office (ESO): The ESD/ESO are responsible for:

1. Designating individuals to serve as Hazardous Waste Manager (HWM);

2. Coordinating with Divisional/Branch Hazardous Waste Coordinators (HWC) and/or Hazardous Waste Handlers (HWH), and interfacing with and providing guidance to shop supervisors as required by this instruction;

3. Developing, implementing, and monitoring the FLETC HWMP including: Waste Minimization, Waste Analysis, and Hazardous Waste Inspections;

4. Coordinating the submittal of all permit applications, manifests, audits, checklists, reports, plans, and payments of fees and fines as required by EPA and State regulators;

5. Coordinating all inspections by EPA and State regulators and notifying ESD with inspection results. Coordinating contract agreements and compliance audits with HW contractors (if applicable) to ensure federal, state and local regulatory compliance;

6. Assisting Division/Branch HWC and shop supervisors in the management of HW activities in their appointed duties;

7. Developing and publishing guidance for all activities and individuals handling or managing HW. Guidance shall pertain to classification of HW, safety precautions, packaging, labeling, storage, transportation, disposal requirements, and other responsibilities;

8. Authorizing the establishment, closure, or change in status of HW

accumulation sites on the Centers;

9. Submitting budget requirements for FLETC HW disposal costs;

10. Supervising, directing, and assisting the HWCs for all hazardous waste issues and management of Accumulation Sites and Satellite Accumulation Areas (SAAs);

11. Responding to all spills and coordinating all spill clean-up for the location and making all appropriate notifications when required. Notifying ESD of any regulatory notifications;

12. Reviewing, certifying, and signing all manifests and paperwork for all shipments of FLETC hazardous waste. Manifests will only be signed by individuals granted signatory authority by the ESD Division Chief/Site Director. The only personnel with signatory authority are those identified as HWMs who have completed and are current with the required training as specified by 40 CFR part 262 and 49 CFR 172-173; and

13. Insuring through oversight that all individuals exposed to hazardous waste activities receive the appropriate training and protective equipment.

B. Procurement Division (PRO): PRO is responsible for:

1. Coordinating compliance issues with onsite contractors generating waste;

2. Coordinating with ESD/ESO to ensure onsite contractors are informed about the information contained in the HWMP;

3. Ensuring Contracting Officer Representatives (COR's) conduct regular inspections of contractor sites to ensure compliance with the HWMP; and

4. Coordinating with ESD/ESO to provide HWMP training of all contractor personnel who generate, handle, and store HW.

C. Assets and Logistics Management Division (ALM): ALM is responsible for:

1. Coordinating with ESD/ESO for the sale or disposition of recyclable hazardous waste materials (i.e., bullet waste, bullet brass, computers, monitors, etc.);

2. Providing storage and handling of recyclable materials that would otherwise be considered HW. Wastes to be recycled may be held on site for up to one year; and

3. Furnishing ESD/ESO a copy of all Certificates of Recycling as evidence that a hazardous material has been recycled.

D. Facilities Management Division (FMD): FMD is responsible for:

1. Coordinating all construction/renovation work through HWM(s) to ensure proper disposal and removal of waste generated by the Contractor;

2. Ensuring the HWM(s) are informed of all new construction/renovation

projects. HWM(s) will be provided an allotted time during pre-construction meetings to ensure contractors are briefed on HW requirements and compliance issues; and

3. Supporting the HWM(s) in providing available equipment and personnel for onsite spill response.

E. Hazardous Waste Manager (HWM)/Hazardous Waste Handler (HWH): These individuals are the only persons authorized to transport HW within the Center. This individual may be government staff or contractor personnel. The HWM and HWH may be the same individual. The HWM/HWH is responsible for:

1. The overall operation of FLETC Accumulation Sites;

2. Ensuring transportation of HW within the Center is accomplished in strict accordance with all federal, state, and local laws and regulations;

3. Conducting weekly inspections of Accumulation Sites utilizing a Hazardous Waste Accumulation Site Inspection Form (see Attachment 1);

4. Conducting weekly inspections, according to State regulations, of Satellite Accumulation Areas (SAAs) utilizing SAA Inspection Checklist (Attachment 9) unless a contract vehicle is in-place at FLETC utilizing a contracted personnel, which may stipulate more stringent requirements;

5. Certifying all contents, markings, labeling, and documentation [Waste Information Document (WID) (Attachment 10)] for all HW transferred to the Accumulation Site;

6. Picking up HW waste from SAAs within three consecutive days of notification from the HWC or shop supervisor;

7. Entering the EPA waste codes (see Attachment 3) is on the label of the container when a container is placed in the SAA and ensuring the date is entered on the label at the time it is placed in the accumulation area;

8. Prior to transporting containers off Center, ensuring that all HW is properly packaged, labeled, and marked, per 40 CFR 262, Subpart C;

9. Delivering empty containers, lever-locking rings/drum funnels, and labels upon request of the HWC;

10. Responding to all spills over one (1) gallon. Coordinating clean-up and disposal of material with ESD/ESO;

11. Reporting and recordkeeping, per 40 CFR 262, Subpart D and to include WIDs (see Attachment 10);

12. Weighing all drums and documenting on labels (see Attachment 2), assigning drum I.D. numbers, and updating drum logs; and

13. Inspecting all construction/renovation debris dumpsters/roll-offs on an as needed basis to ensure no HW is being disposed of improperly.

F. Hazardous Waste Coordinator (HWC)/ Shop Supervisors: The HWC/ Shop Supervisors are responsible for:

1. Handling and storing all waste in accordance with specific instructions provided on the WID by the HWM;

2. Maintaining documentation (Profiles, WIDs, analytical data, etc.) of all waste generated within their respective areas;

3. Ensuring that SAAs are operated in compliance with Section **VI.F** of this document;

4. Coordinating with the HWM(s) for establishment and location of new SAAs;

5. Notifying the HWM/HWH when 55 gallons of HW is accumulated at an SAA; and

6. Ensuring the date is entered on the label at the time 55 gallons of HW has been accumulated at the SAA.

G. Divisions and Partner Organizations (POs): Divisions and POs are responsible for:

1. Identifying all HWCs for their respective areas if applicable. Ensuring that individuals, groups, activities, or contractors under their authority comply with this Plan;

2. Appointing one HWC from each shop/area that generates waste. The HWC and shop supervisor shall serve as liaisons between the organization and the ESD/ESO;

3. Ensuring the HWC and shop supervisor are trained by the ESD/ESO, or a qualified trainer approved by the ESD/ESO, in accordance with the requirements of Section VI.J, Hazardous Waste Handlers Training; and

4. Implementing procedures to reduce costs associated with HW management and disposal options, including recycling/reuse and waste minimization.

VI. PROCEDURES:

A. Hazardous Waste Classification. This section defines the classifications of waste subject to policy, procedures, and requirements of the HWMP. **Hazardous Waste Classification:** A solid waste, that is not excluded from regulation as a HW as listed in either 40 CFR Parts 260 through 268 or State regulations, and exhibits any of the characteristics of ignitability, corrosivity, reactivity, or toxicity.

1. Characteristic D001: A solid waste is given an EPA Hazardous Waste Number D001 if it exhibits the characteristic of ignitability, including:

a. A liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, with a flash point of less than 140° Fahrenheit.

b. A non-liquid which under normal conditions is capable 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 as defined by 40 CFR 261.21(a)(3).

d. An oxidizer as defined in 40 CFR 261.21(a)(4).

2. Characteristic D002: A solid waste is given an EPA waste number of D002 if it exhibits the characteristic of corrosivity, including:

a. An aqueous solution with a pH less than or equal to 2 or greater than or equal to 12.5 standard units.

b. A liquid which corrodes steel at a rate greater than 1/4 inch per year at a test temperature of 130° Fahrenheit.

c. A solid waste that exhibits the characteristic of corrosivity.

3. Characteristic D003: A solid waste is given an EPA waste number of D003 if it exhibits the characteristic of reactivity, including:

a. 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, generates toxic gases, vapors or fumes.

e. Cyanide or sulfide bearing wastes which, when exposed to pH conditions between 2 and 12.5 standard units, can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment.

f. It is capable of detonation or explosive reaction if subjected to a strong initiating source or if heated under confinement.

g. It is readily capable of detonation or explosive decomposition at standard temperature and pressure.

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

4. EPA Waste Designation by Toxicity Characteristic Leaching Procedure (TCLP): A solid waste is given an EPA waste number if it exhibits toxicity characteristics as determined by Toxicity Characteristic Leaching Procedure (TCLP) testing of a representative sample of the waste at a concentration greater than or equal to the respective, regulated level of any of the contaminates listed in Attachment 12.

5. Hazardous Wastes from Non-Specific Sources (F-listed): HWs from nonspecific sources are known as F-listed wastes. These HWs are generated from common manufacturing and industrial processes. Refer to 40 CFR 261.31 for a specific

listing.

6. Hazardous Wastes from Specific Sources (K-listed): HWs from specific sources are known as K-listed HWs. These HWs are generated by specific sectors of industry and manufacturing processes. Refer to 40 CFR 261.32 for a specific listing.

7. Acute Commercial Chemical Products (P-listed): Discarded or intended to be discarded commercial chemical products, manufacturing chemical intermediates or off-specification chemical products, residue remaining in the containers, or contaminated soil, water, or other debris resulting from the cleanup of a spill, that have the major ingredient listed in 40 CFR 261.33(e) are known as P-listed HWs. These HWs are identified as acute HW and carry the associated EPA hazardous waste number.

8. Toxic Commercial Chemical Products (U-listed): Discarded or intended to be discarded commercial chemical products, manufacturing chemical intermediates or off-specification chemical products, residue remaining in the containers, or contaminated soil, water, or other debris resulting from the cleanup of a spill, that have the major ingredient listed in 40 CFR 261.33(f) are known as U-listed HWs. These HWs are identified as toxic HW and carry the associated hazardous waste number.

9. Non-Hazardous Solid Waste: The following solid wastes are **NOT** considered to be HW:

a. Household waste.

b. Fly Ash waste, bottom ash waste, and flue gas emission control waste generated primarily from the combustion of coal or other fossil fuels except for facilities that burn HW.

c. Drilling fluids, produced waters, and other wastes affiliated with the explorations, development, or production of crude oil, natural gas, or geothermal energy.

d. Solid waste which consists of discarded arsenical-treated wood or wood products which fail the test for Toxicity Characteristics for EPAHWN D004 through D017 and which is not a HW for any other reason if the waste is generated by persons who utilized the arsenical-treated wood and wood products for those materials intended end use.

e. Petroleum contaminated media and debris that fail the test for Toxicity Characteristic (Hazardous Waste Codes D018 through D043 only) and are required to meet the corrective action regulations under 40 CFR Part 280.

f. Used chlorofluorocarbon refrigerants from totally enclosed heat transfer equipment, including mobile air-conditioning systems, mobile refrigeration, and commercial and industrial air conditioning and refrigeration systems that use chlorofluorocarbons as the heat transfer fluid in a refrigeration cycle, provided that the refrigerant is reclaimed for further use.

g. Non-terne plated used oil filters that are not mixed with a listed HW if these oil filters have been gravity hot-drained using one of the following methods:

1) Puncturing the filter anti-drain back valve or the filter dome end and hot-draining;

2) Hot-draining and crushing;

3) Dismantling and hot-draining; and/or

4) Any other equivalent hot-draining method which will remove the oil.

B. Universal Waste Classification: The regulations for universal waste can be found in 40 CFR Part 273. These regulations, finalized in 1995 by the EPA, are less stringent management standards for batteries, recalled and unused pesticides, mercury-containing equipment, and lamps (i.e., fluorescent, mercury vapor, high pressure sodium, etc.). These standards are designed to reduce the amount of waste batteries, recalled and unused pesticides, mercury-containing equipment, and lamps sent to municipal waste landfills/incinerators. These wastes have been classified as universal waste. The definitions and applicability of these wastes are described in the following sections. Universal Wastes may be accumulated for one year.

1. Batteries: Batteries classified as universal waste:

a. Any device consisting of one or more electrically connected electrochemical cells which are designed to receive, store, and deliver electric energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed.

b. Spent lead-acid batteries which are not managed in 40 CFR Part 266, Subpart G.

2. Batteries not Classified as Universal Waste:

a. Spent lead-acid batteries that are managed under 40 CFR Part 266, Subpart G.

b. Batteries that are not yet waste under 40 CFR, Part 261.

c. Batteries that are not hazardous waste. A battery is a hazardous waste if it exhibits one or more of the characteristics identified in 40 CFR Part 261, Subpart C.

3. Generation of Waste Batteries:

a. A used battery becomes a waste on the date it is discarded (e.g., when sent for reclamation).

b. An unused battery becomes a waste on the date the handler decides to discard it.

c. Batteries determined as discarded shall have ends taped to prevent

possible fire hazard/ignition from electrical residual current prior to being placed in receptacle.

4. Management of Waste Batteries: All batteries are to be collected for recycling. No battery (no matter what type) is to be thrown into the regular trash (domestic trash). All batteries will be recycled. There are two methods for collecting, storing, and recycling used batteries in the work centers:

a. First method:

1) At the request of the ESD/ESO, a battery storage container (6 gallon fiberboard drum) will be delivered to the work center for the collection and storage of used batteries. These containers will be properly labeled (Attachment 4) by the HWC.

2) Employees will tape (using any type of tape) each end of the battery before placing into battery container.

3) Employees will ensure container is closed at all times except when placing batteries into the container.

4) Once the container is full, contact the ESD/ESO for pick-up. The HWM/HWC will pick up the full container and replace it with an empty container.

b. Second method: For small generation of batteries (one or two at a time) the following procedure may be used:

1) Tape each end of battery.

2) Place battery/batteries in a guard mail/regular envelope and send to ESD/ESO or the respective HWM/HWC.

c. All large type batteries (i.e., car, forklift, golf cart, etc.) will be turned into the prospective FLETC motor vehicle facilities (i.e., garage, motor pool, vehicle maintenance, etc.). Contact the ESD/ESO to coordinate pick-up of large batteries. All large used batteries must be stored in corrosive lockers and must be labeled (Attachment 4) with accumulation date posted on label.

5. Mercury-Containing Equipment: A device or part of a device (including thermostats, but excluding batteries and lamps) that contains elemental mercury integral to its function.

6. Mercury-Containing Equipment not Classified as Universal Waste:

a. Mercury-containing equipment that are not yet wastes.

b. Mercury-containing equipment that are not hazardous waste. Mercury-containing equipment is a hazardous waste if it exhibits one or more of the characteristics identified in 40 CFR Part 261, Subpart C.

c. Equipment and devices from which the mercury-containing components have been removed.

7. Generation of Waste Mercury-Containing Equipment: Used

mercury-containing equipment becomes a waste on the date it is discarded (e.g., sent for reclamation). An unused mercury-containing equipment becomes a waste on the date the handler decides to discard it.

8. Management of Thermostats: Facility maintenance personnel (government and contractor) should manage thermostats in a way that prevents releases of any mercury to the environment. The management of waste thermostats is as follows:

a. SAA's are established at each FLETC facility by the ESD/ESO for the storage of universal waste thermostats.

b. Glynco - Bldg. 210.

c. Artesia - 270 Day Storage Area (Main Campus).

d. Cheltenham - Bldg. 53, 90-Day Central Accumulation Site.

e. Charleston - Waste Accumulation Site.

f. The containers must be closed, structurally sound, compatible with the contents of the thermostat, and show no evidence of leakage, spillage, or damage that could cause leakage.

g. Maintenance personnel may remove mercury-containing ampules from universal waste thermostats provided the handler removes the ampules in a manner designed to prevent breakage of the ampules.

i. Remove ampules only over or in a containment device (e.g., tray or pan sufficient to collect and contain any mercury released from an ampule in case of breakage).

j. Ensures that a mercury clean-up system is readily available to immediately transfer any mercury resulting from spills or leaks from broken ampules, from the containment device to a container that meets the requirements of 40 CFR 262.34.

k. Transfer any mercury resulting from spills or leaks from broken ampules from the containment device to a container that meets the requirements of 40 CFR 262.34.

l. Ensure that the area in which ampules are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels for mercury.

m. Ensure that employees removing ampules are thoroughly familiar with proper waste mercury handling and emergency procedures, including transfer of mercury from containment devices to appropriate containers.

n. Store removed ampules in closed, non-leaking containers that are in good condition.

o. Pack removed ampules in the container with packing materials adequate to prevent breakage during storage, handling, and transportation.

p. All containers of universal waste thermostats must be labeled (Attachment 4) with accumulation date posted on label.

9. Lamps: Lamps classified as universal waste:

a. Must be cleaned and placed in a container that will prevent release of the pieces to the environment.

b. Must be contained in containers or packages that are structurally sound, adequate to prevent breakage.

c. Containers and packages must remain closed and must lack evidence of leakage, spillage or damage.

10. Lamps not Classified as Universal Waste:

a. Lamps that are not yet wastes under 40 CFR part 261.

b. Lamps that are not hazardous waste.

c. A lamp is a hazardous waste if it exhibits one or more of the characteristics identified in part 40 CFR 261, subpart C.

11. Generation of Waste Lamps: A used lamp becomes a waste on the date it is discarded (e.g., sent for reclamation). An unused lamp becomes a waste on the date the handler decides to discard it.

a. A handler [e.g., small quantity handler (SQH) or large quantity handler (LQH)] of waste lamps must manage waste lamps in a way that prevents releases of any waste lamps or a component of a waste lamp.

b. Small quantity handler of universal waste means a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

c. Large quantity handler of universal waste means a universal waste handler who accumulates 5,000 kilograms or more total of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time. This designation as a large quantity handler of universal waste is retained through the end of the calendar year in which the 5,000 kilogram limit is met or exceeded.

12. Management of Lamps: FLETC facility maintenance personnel (government and contractor) must manage lamps in a way that prevents breakage or release to the environment. The management of waste lamps is as follows:

a. All universal waste lamps will be recycled by placing used lamps into lamp containers (provided by the HWC) at the following FLETC locations:

1) Glynco - Bldg. 210.

2) Artesia - 270 Day Storage Area (Main Campus).

3) Cheltenham - Bldg. 53, 90-Day Central Accumulation Site.

4) Charleston - Waste Accumulation Site.

b. Personnel may also contact the ESD/ESO for delivery and pick-up of bulk containers for large quantity generation of lamps. Pick-up of bulk containers will be accomplished by the HWM/HWC.

c. All containers of waste lamps must be labeled (Attachment 4) with accumulation date posted on label.

C. Used Oil Management: Used oil is a regulated waste. Regulated wastes are those solid wastes that either are not characterized as a hazardous waste, but due to their characteristics, may not be disposed of as a normal municipal refuse; and/or might be characterized as a hazardous waste, but due to specific exemptions in the regulations require special handling.

1. Used Oil: May be handled as a hazardous waste or according to specific used oil requirements as outlined in 40 CFR 279. Depending on the constituents of the used oil, facilities are required to handle used oil as a hazardous waste or according to the specific used oil requirements outlined in 40 CFR 279.10.

2. Used Oil as Hazardous Waste: Used oil that is required to be handled as a hazardous waste consists of the following:

a. Mixtures of used oil and listed as hazardous waste;

b. Used oil containing more than 1,000 ppm total halogens;

c. Used metalworking oils/fluids containing chlorinated paraffins if processed through a tolling agreement;

d. Used oil contaminated with CFCs removed from refrigeration units where the CFCs are destined for reclamation; and

e. Mixtures of used oil and hazardous waste if the resultant mixture exhibits characteristics of a hazardous waste.

3. Used Oil Management/Containment Procedures:

f. The words ***"USED OIL"*** must be clearly marked on containers and aboveground tanks that store used oil and on fill pipes that transfer used oil into underground storage facilities.

g. Containers utilized as used oil generators must be made of or lined with materials compatible with the used oil stored in them.

h. Containers must be closed during storage, except when it is necessary to add or remove used oil, and handled in a safe manner.

i. Secondary containment on tank systems at used oil generators must meet specific requirements including one or more of the following:

1) A liner (external to the tank),

2) A vault,

3) A double-walled tank, or

4) An equivalent approved device.

j. Tank ancillary equipment at used oil generators must also be provided with secondary containment.

k. Tanks used for used oil treatment or storage at used oil generators must follow certain operating requirements such as:

1) Spill and overfill prevention controls.

2) Maintenance of sufficient freeboard to prevent overtopping.

D. Generator Classification: This section defines facility classifications applicable to FLETC facilities and accumulation conditions which shall be met for regulated HW and universal wastes to be accumulated onsite.

1. Large Quantity Generator (LQG): Large Quantity Generator (LQG) of HW may accumulate HW onsite for 90 days or less without a permit, provided certain conditions are met. The facilities at Glynco and Cheltenham are classified as large quantity generators.

2. Small Quantity Generator (SQG): are allowed by regulation to accumulate waste on site for 180 days and 270 days if the disposal facility is over 200 miles away. The Artesia, NM facility is designated as a SQG and a 270-day accumulation site.

3. Very Small Quantity Generator: These facilities are exempt from the requirements of the regulation and are allowed to accumulate hazardous waste for one year. The Charleston, SC facility is "exempt" from regulation.

4. Universal Waste Handler: FLETC sites may accumulate universal waste onsite for no longer than one year from the date the universal waste is generated.

E. Hazardous Waste Accumulation Sites & Management: A hazardous waste accumulation site is an area where HWs may be accumulated, temporarily, before being transported to a permitted, offsite waste disposal facility. The HWMs are assigned as the program manager for these facilities. The HWMs shall ensure that the administration, storage management, container management, and inspections are conducted in accordance with this Manual. The Accumulation Site is designed to be a temporary storage site for wastes. Wastes shall be picked up by a contractor and transported to a treatment, storage, and disposal facility (TSDF) within the site's regulated allotted time to prevent from being out of compliance. If this storage period cannot be met for some reason (e.g., waiting for analysis results), this information shall be indicated on the Hazardous Waste Accumulation Site Inspection Checklist.

1. Generator EPA ID Number: Pursuant to 40 CFR Part 262.34 and state regulations, the following EPA Numbers have been assigned to each FLETC facility authorized to operate HW Accumulations:

a. Glynco, GA - GA6202932244.

b. Artesia, NM - NMR000002964, NMR000006700 (two sites).

c. Cheltenham, MD - MDR000503847.

d. Charleston, SC - Exempt.

2. General Conditions: The following general conditions shall be met for HW Accumulation Sites at FLETC facilities:

a. Inspections shall be conducted at least weekly and recorded on the Hazardous Waste Accumulation Site Inspection Form, Attachment 1.

b. Certified documents shall be maintained on file at the environmental office for the life of the Center.

c. Records of test results, inspections, waste analyses, and determinations shall be kept on file for the life of the Center.

d. A current copy of the HWMP shall be maintained at each HW Accumulation Site.

3. Storage/Container Management: The following storage/container management procedures shall be followed at all HW Accumulation Area(s)/Site(s):

a. Accumulation areas for containers of HW shall have a containment system with sufficient capacity to contain 10 percent of the volume of all containers, or 110% of the volume of the largest container, whichever is greater.

b. Inside storage of 55-gallon HW drums shall be within a structure designed to store HW.

c. Incompatible wastes shall be segregated, including separate secondary containment.

d. Storage areas shall be provided with adequate ventilation and lighting.

e. Storage areas shall not be located near any drainage system.

f. Storage areas shall have proper fire and safety equipment. An appropriate fire extinguisher shall be maintained within 50 feet of the waste storage area.

g. Spill absorbent material and equipment shall be located at the Accumulation Site.

h. HW containers shall be inspected weekly for container leaks or deterioration. Results shall be documented on Hazardous Waste Accumulation Site Inspection Form (see Attachment 1).

i. HW containers shall be in good condition and shall be compatible with the waste stored in them.

j. HW containers shall be kept closed except when waste materials

are being added or removed.

k. HW containers shall be properly labeled/marked as indicated in Attachments 2 and 3.

l. Manufacturer's recommendation for properly closing containers shall be retained at the Accumulation Site.

m. The storage areas are either a fenced and locked compound, a surface impoundment or a secured building designed to prevent unknown entry, and shall not be readily accessible by unauthorized personnel. Security and signs are provided in accordance with the requirements below.

n. Storage areas shall maintain adequate aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

o. The accumulation start date shall be marked on the container. The accumulation start date is the date that the container is considered "FULL."

p. The specific hazardous identification number of each component, when specified, shall be marked on the container by the HWM.

q. Outdoor HW accumulation site shall be protected from the weather.

4. Security of Accumulation Area: The following security measures shall be in effect for the Accumulation Site:

a. The facility shall be surrounded by a fence,

b. Entrances shall be locked when unmanned, and

c. Lighting shall be provided for the fenced enclosure.

d. FLETC personnel shall immediately report apparent breaches of security at the Accumulation Site to the ESD/ESO or the site HWM.

5. Signage for Accumulation Area:

a. The following signs shall be posted at the 90, 180, or 270-Day Accumulation Site: A sign, of appropriate size, with the following wording, shall be posted at the entrance:

"**CAUTION**

HAZARDOUS WASTE ACCUMULATION SITE

AUTHORIZED PERSONNEL ONLY"

b. An 18 x 24-inch, or larger, sign which defines who to notify in case of a spill or emergency. At a minimum, the sign should state:

"**IN CASE OF SPILL OR EMERGENCY,**

IMMEDIATELY CONTACT SECURITY

(TELEPHONE #)"

c. A **"No Smoking"** sign will be posted on all four sides of the Accumulation Site.

d. All signs shall be legible from a distance of not less than 25 feet.

F. Satellite Accumulation Area (SAA): HW generators may accumulate up to 55 gallons of HW, or up to one quart of Acutely HW, in containers at or near any point of initial generation [e.g., satellite accumulation area (SAA)].

1. General: The following general conditions shall be met at each SAA area at FLETC:

a. The SAA shall be near the point of generation.

b. The SAA shall be under the control of the HWC of the waste generating work center.

c. All SAA activities shall be placed under the supervision of the ESD/ESO. This may be delegated to the resident environmental professional at a site.

d. All SAA's will be inspected on a weekly basis. The HWC will inspect and record inspections on the SAA Inspection Checklist, see Attachment 9.

e. A copy of the Waste Information Document (WID) (see Attachment 10) shall be maintained, by the HWC, at each satellite accumulation area.

2. SAA Container Management: The following container management procedures shall be followed at each SAA at FLETC:

a. HW containers shall be in good condition and shall be compatible with the waste stored in them.

b. HW containers shall be labeled or marked clearly with the words "Hazardous Waste," while waste is being accumulated in them at the SAA.

c. HW containers shall be kept closed (more than finger tight), except when waste materials are being added or removed.

d. Lever-locking rings or drum funnels may be utilized on all open-top drums that contain solid type waste; this does not apply to liquid waste. Rings must be secured by using shower hooks (except when waste materials are being added or removed).

e. Prior to transporting container to the 90, 180, or 270-Day Accumulation Site, lever-locking rings/funnels must be removed and a DOT approved ring and bolt assembly must be installed in accordance manufacturer's recommendation.

f. All containers shall be properly labeled and marked, per the WID

(see Attachment 10), with a waste material label (see Attachment 2). If the material is hazardous, then a hazardous waste label (see Attachment 3) must be installed on the container in conjunction with the waste material label.

g. The accumulation start date shall be marked on the container, when the container is considered "FULL" or 55 gallons is exceeded for that SAA.

h. The specific EPA Waste Number (see Attachment 3), when specified by the WID, shall be marked on the container by the HWC.

i. HW shall be segregated by waste stream and compatibility.

j. HW containers shall be transferred by the HWM/HWH to the 90, 180 or 270-Day Accumulation Site within three days after accumulation start date is entered on container. Note: For the Cheltenham facility, the container must be moved the same day. The three day transfer timeframe does not apply to Cheltenham.

3. Procedure for Establishing New Satellite Accumulation Areas: Accumulation areas may be established where a new waste generating activity is identified. Prior to establishing any new SAA, the waste generating activity's HWC or shop supervisor shall contact the ESD/ESO or HWM for authorization and procedures for establishing the new SAA.

4. Universal Waste Accumulation: Universal waste may accumulate onsite for not more than 1 year from the date that the universal waste is generated. Each handler must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by:

a. Placing the universal waste label (Attachment 4) on a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received.

b. Marking or labeling the individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received.

c. Maintaining an inventory system on-site that identifies the date the universal waste being accumulated became a waste or was received.

d. Maintaining an inventory system onsite that identifies the earliest date any universal waste in a group of universal waste items, or a group of containers of universal waste, became a waste or was received.

e. Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste in the area became a waste or was received.

f. Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received.

G. Specific Classes of Hazardous Waste Management: This section describes the management of specific classes of hazardous wastes, including solvents, expended ordnance, and Petroleum, Oil, and Lubricants (POLs) at FLETC.

1. Solvents: All solvents used on FLETC shall be approved by the ESD/ESO and placed on the facilities Authorized Use List (AUL).

a. Solvent Management: Solvents shall be maintained and used in accordance with the manufacturers SDS and OSHA standards. Solvents shall be maintained in their original containers until spent. Used solvent shall be placed in approved accumulation containers for disposal or recycling.

b. Solvent Substitution: Solvent users shall modify their solvent usage and purchase of substitute solvents when notified by the ESD/ESO. All stocks of used/unused solvents that do not comply with approved procedures shall be turned in to the 90, 180, or 270-Day Accumulation Site for disposal.

c. Solvent Reclaiming: Solvent users are encouraged to reclaim all recyclable solvent for reprocessing services.

d. Unlawful Disposal: Solvents shall not be discharged to the sanitary or storm sewers, disposed of in the landfill, burned, abandoned, evaporated, or placed in used oil tanks or drums. Contact the ESD/ESO for proper disposal.

e. **Solvent Requisitioning:** All solvents shall be approved for use on FLETC (AUL).

2. Expended Ordnance Management: FLETC shall recycle all possible components of expended ordnance to include conventional bullets and simunition rounds. Expended ordnance shall be collected in the following manner:

a. Shell casings are collected and placed in fiberboard boxes located on all ranges. Casings are returned to the firearms equipment room. All casings are recycled.

b. Spent bullets are collected by the bullet recovery system incorporated into the enclosed ranges. All lead is picked up by a commercial contractor for recycling.

c. Shell casings are sorted by hand and all live rounds are removed. The casings are kept segregated by caliber and type and are weighed and placed in cardboard containers for resale to ammunition contractors.

d. When earth berm ranges are refaced, the ammunition recovered in this maintenance operation is to be recycled to the greatest extent possible.

e. Unlawful Disposal: Expended ordnance shall never be disposed of on the ground, in the landfill, or in trash containers/dumpsters. Contact ESD/ESO or HWM for proper disposal.

3. Petroleum, Oil, and Lubricants (POLs):

a. POL Management: FLETC shall recycle POLs to the highest extent possible and minimize the waste of POLs. POLs shall be maintained and used in accordance with the manufacturers SDS and OSHA standards. POLs shall be maintained in their original containers until spent. Used POLs shall be placed in approved accumulation containers for disposal or recycling.

b. Unlawful Disposal: POLs shall not be discharged to the sanitary or storm sewers, disposed of in the landfill, burned, abandoned, or evaporated. Contact the ESD/ESO or HWM for disposal assistance.

c. POL Contaminated Soils: POL products spilled on soil shall be excavated and containerized. Contact ESD/ESO or HWM for proper disposal guidance.

H. FLETC Waste Analysis Plan: This section defines the chemical and physical information of any HW which shall be determined before the waste can be transferred to the 90, 180, or 270-Day Accumulation Site. In order to make the determination that a waste is hazardous, the generator may certify the waste is hazardous by generator knowledge or perform characterization tests to determine which HW characteristic(s) are exhibited.

1. Characterization Test: A characterization test for waste from each continuous process shall be performed initially when a new waste is introduced to the area, or when changes occur in the process.

a. Characterization testing of waste generated by FLETC shall be performed by certified laboratory. All FLETC contractors (both construction and service) shall be responsible for conducting their own waste characterization and submitting those to ESD/ESO or HWM for approval.

b. Characterization testing is not required when the generator can certify, using generator knowledge, that the waste(s) is hazardous in accordance with the criteria established in 40 CFR Part 261. An example of the application of generator knowledge to make the HW determination would be spent acid with a pH less than or equal to 2 standard units.

c. Initial characterization testing shall be performed when a HW is suspected to be hazardous by a characteristic of toxicity. Further testing may be required if changes in the process which creates that waste are implemented. It is incumbent upon the generator to properly characterize the waste generated by their actions.

2. Unknown Wastes Testing: Unknown wastes are discovered at FLETC from time to time. Discovery of unidentified containers shall be immediately reported to the ESD/ESO.

a. The contents of these unidentified containers shall be analyzed to determine its waste characteristics for proper disposal.

b. These containers shall be labeled (Attachment 5) as unknown wastes until identified by analysis.

c. Disposal of the wastes shall be made when analytical results become available.

d. Unidentified containers shall be maintained at the waste Accumulation Site until disposal.

3. Testing Services: The ESD/ESO or HWM shall manage the testing services. When a container requires testing prior to disposal, the ESD/ESO or HWM shall:

a. Coordinate collection of samples.

b. Forward samples to the analytical laboratory.

c. Receive the analytical results and advise the HWC of the proper disposal by generation of a new WID.

4. Disposal upon Determination: When the waste analysis indicates a material is hazardous, the container shall be properly marked and labeled, accurately stored and processed for proper disposal. The ESD/ESO or HWM is responsible for maintaining all analytical results on file.

I. Waste Disposal Procedures: This section defines the procedures which shall be followed to properly dispose of HW.

1. Hazardous Waste Transfer within FLETC: Transfer of HW within FLETC complex shall only be performed by the HWM/HWH. The following procedures for HW transfer shall be followed.

a. Transportation of HW shall be accomplished in strict accordance with all applicable Federal, State, and local laws and regulations.

b. HW shall not be transported on any public highway or road except by a licensed HW transporter using a Uniform HW Manifest. HW manifests shall only be signed by individuals who have received the required training as defined in 40 CFR 262, 264 or 265 and 49 CFR 172, Subpart H.

c. HW shall not be transported onto FLETC from outside the Center.

d. HW shall be properly secured to avoid spills during transport on the Center.

e. Containers shall be in a safe-to-handle and non-leaking condition and labeled and marked when offered for transportation.

f. Incompatible waste shall not be transported on the same vehicle.

2. Unstable Hazardous Waste: When the HW cannot be safely transported, contact the ESD/ESO or HWM to receive guidance for transferring the HW. The ESD/ESO or HWM shall determine and provide the proper procedures for either stabilizing or disposing the HW.

a. Do <u>not</u> attempt to transfer or over pack unstable HW without

notifying ESD/ESO or HWM.

b. Unstable HW includes wastes leaking from faulty containers, or reactive, ignitable, or incompatible waste types.

3. Handling Procedures for Hazardous Waste: The HW shall be properly packaged, marked, labeled, and shipping papers and manifests filled out correctly.

4. Packaging: Bulk and non-bulk packaging of HWs are subject to the requirements of 49 CFR Parts 100-180, Department of Transportation.

5. Marking: The HWM will ensure that each container in the 90, 180, or 270-Day Accumulation Site shall be marked in accordance with 49 CFR 172, Subpart D with the following:

a. Proper shipping name and identification numbers.

b. Generators name, address, building number, and telephone number.

c. The statement "HAZARDOUS WASTE" (if applicable).

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

e. EPA Hazardous Waste Number (EPAHWN) (if applicable), see Attachment 3.

f. The statement "ACCUMULATION START DATE _____".

6. Labeling: Each container shall be labeled according to 49 CFR 172, Subpart E. (i.e. Table 172.101).

7. Shipping Papers: Shipping papers shall be filled out correctly in accordance with 49 CFR 172, Subpart C. The ESD/ESO or HWM shall prepare the manifest or provide guidance to construction/service contractor(s) for manifesting HW.

8. Transportation: After the ESD/ESO or HWM has completed the inspection of the container and certified the shipping manifest, the ESD/ESO or HWM shall coordinate the transport of the container to a TSDF. Note: Construction/service contractors will coordinate their waste transportation requirement through the ESD/ESO or HWM.

J. Hazardous Waste Training: This section defines the training requirements which shall be provided to personnel who handle or originate Hazardous/Universal waste generated at FLETC.

1. Training Requirements: All major divisions that originate hazardous or industrial waste shall appoint a HWC. This individual shall be responsible for waste compliance within their division/respective area. A 2-hour course covering Environmental Compliance, Hazardous Waste Management, and universal waste will be provided and instructed by the ESD/ESO or HWM on an annual basis. The ESD/ESO or HWM will provide copies of FLETC's HWMP.

2. RCRA Training Program: Before working unsupervised, all personnel who handle HW must successfully complete a program of classroom and on-the-job training that teaches them to safely and effectively perform their duties and respond to emergencies. 40 CFR 265.16 prescribes the minimum requirements for HW work training, which includes:

a. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.

b. Communications and/or alarm systems.

c. Procedures for responding to fires or explosions.

d. Procedures for responding to soil and groundwater contamination incidents.

e. Procedures for shutdown of operations.

f. Personnel must successfully complete the training within six (6) months of their assignment to a position where they will handle HW. Personnel who handle HW shall receive an annual refresher of their initial training. The ESD/ESO or HWM will maintain all training records establishing attendance and completion of the required course and refresher training.

3. Site Specific Training: All personnel working with HW at the SAA shall be trained within six (6) months of their assignment. The training shall be site specific and can consist of classroom instruction or on-the-job training that is sufficient to ensure compliance with hazardous waste management procedures.

a. Employees shall not work unsupervised until proper training is completed.

b. The training program shall be directed by the ESD/ESO or HWM who is trained in HW management procedures.

c. Job titles and descriptions for each employee by name shall be on file.

d. Copies of training rosters shall be kept and maintained with ESD/ESO or HWM.

e. All personnel shall be informed of this Plan and trained on the HW in their work area at the time of their initial assignment and whenever a new HW is introduced into their work area. Personnel shall also receive annual refresher training. Copies of training rosters shall be kept and maintained with ESD/ESO or HWM.

K. Waste Minimization: This section constitutes FLETC Waste Minimization, designed to continuously reduce hazardous waste generation, in accordance with the Department of Homeland Security directives, by implementing procurement controls, seeking non-hazardous substitution, finding and developing markets for the waste as recyclable material, and total utilization of a hazardous material to eliminate the disposal of

the remainder as a hazardous waste. (See FLETC Hazardous Materials Minimization SOP.)

1. Hazardous Materials: Hazardous materials shall be stored according to protocol or requirements specified in the SDS and according to OSHA.

a. No work center shall order HM's in excess of actual needs, especially items which have a shelf life.

b. No work center shall use HM's that have not been approved by ESD/ESO or HWM and placed on the facilities AUL.

c. Items shall be properly stored and protected from the elements to prevent physical and/or chemical degradations that may result in requiring the items to be discarded as HW.

d. Prior to disposal as HW, determine if the items can be reused, recycled, or disposed of as non-regulated waste, contact ESD/ESO or HWM for guidance.

e. Waste generating activities shall make every effort to minimize the levels of hazardous wastes they generate. Where applicable, non-hazardous materials should be substituted for hazardous materials. (See FLETC Hazardous Materials Minimization SOP.)

2. Pollution Prevention Plan: The purpose of FLETC Pollution Prevention (P2) Plan (P2) is to reduce pollution resulting from facility activities through pollution prevention techniques, including: source reduction, material substitution, and recycling. P2 is FLETC' top environmental priority. The current emphasis on P2 is necessary to meet national and state P2 policy goals, reduce long-term liabilities of waste disposal, save money by reducing the Center's raw material purchases and waste treatment and disposal costs, and protect public health and the environment. P2 is a cost-effective means of meeting environmental objectives in an era when Federal facilities are simultaneously subject to stricter standards for pollution control, under public criticism of their environmental records, and faced with declining budgets. Environmental liabilities increase directly with the volume of hazardous substances and materials in use, and increase to a lesser extent as a result of other materials used, and the solid waste generated. Reducing these long-term liabilities requires a positive commitment, a sound plan, and an aggressive program for modifying past attitudes toward the conservation of all materials. Reducing liabilities also requires actively searching for opportunities to reduce the amount of waste generated and the use of toxic materials, fuels, and chemicals while still accomplishing FLETC' mission.

L. Manifesting Requirements: This section describes the general requirements of the management and disposition of State and Federal hazardous waste through the use of a manifest.

1. Hazardous Waste Manifests:

a. A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or

b. Disposal must prepare a Manifest (OMB Control number 2050-0039) EPA form 8700-22, and if necessary, EPA form 8700-22A until such time an alternate means of manifesting is determined by EPA.

c. A generator must designate the facility permitted to handle the waste described on the manifest.

d. In addition, an alternate facility may be designated for emergency delivery.

e. The manifest consists of at least three copies for the generator, transporter, and the owner or operator of the designated facility, with one copy each for their records and another copy to be returned to the generator.

f. The generator must send three copies of the manifest dated and signed to the owner or operator of the designated facility.

g. If required, a copy of the manifest will be sent to the destination State by the designated facility.

h. If required, a copy of the manifest will be sent to the generator State by the designated facility.

M. Exception Reporting: A generator, who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste. Exception reports must be filed with the EPA Regional Administrator if a copy of the manifest is not received within 45 days after the waste is accepted by the initial transporter. A generator must keep a copy of the exception report for at least three (3) years from the due date of the report.

N. Record Keeping: Generators are required to keep records of waste analyses, tests, and waste determination for at least three (3) years from the date that the waste was last sent to onsite or offsite treatment, storage, or disposal. Manifests will be logged, scanned to the ESD MOSS site and kept indefinitely in a "do not destroy" status. These manifests may be needed should an action arise under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA).

O. **Signature Authority:** Manifests shall only be signed by individuals who have received the required training as determined by 49 CFR Part 172, Subpart H. It is FLETC policy that to sign a manifest the individual must have also completed the applicable RCRA Hazardous Waste Training for 40 CFR Part 262, 264 or 265.

P. Contingency Plans: Large quantity generators of hazardous waste must have a contingency plan as required by 40 CFR 262.34(a)(4). The plans must compy with 40 CFR 264/265 Subpart D. Cheltenham and Glynco sites are required to have a contingency plan due to being large quantity generators. Attached is Glynco's plan (Attachment 13) and Cheltenham's plan (Attachment 14). The Artesia site is not required to have a formal plan due to its status as a small quantity generator.

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Attachment 1 (Example)

HAZARDOUS WASTE ACCUMULATION SITE INSPECTION FORM

Weekly Inspection Log

Item to be Inspected Item to be Inspected	Results		Corrective Action(s)	
	Yes	No	Required	Date Accomplished
STORAGE AREA				
Warning signs present and legible				
Secured and locked when not occupied				
All security/night lights working properly				
Clean and neat (trash, pine straw, leaves etc.) removed				
Adequate aisle space to allow for the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment				
Weeds and grass properly trimmed and cut				
Containment system has sufficient capacity				
HAZARDOUS WASTE CONTAINERS				
Incompatible wastes segregated in separate, secondary containment areas				
Compatible with the waste stored in them				
Good condition, with no visible signs of deterioration				
No sign of leakage, odors, vapors, or fumes				
All drum bungs, rings, and bolts tightly secured				

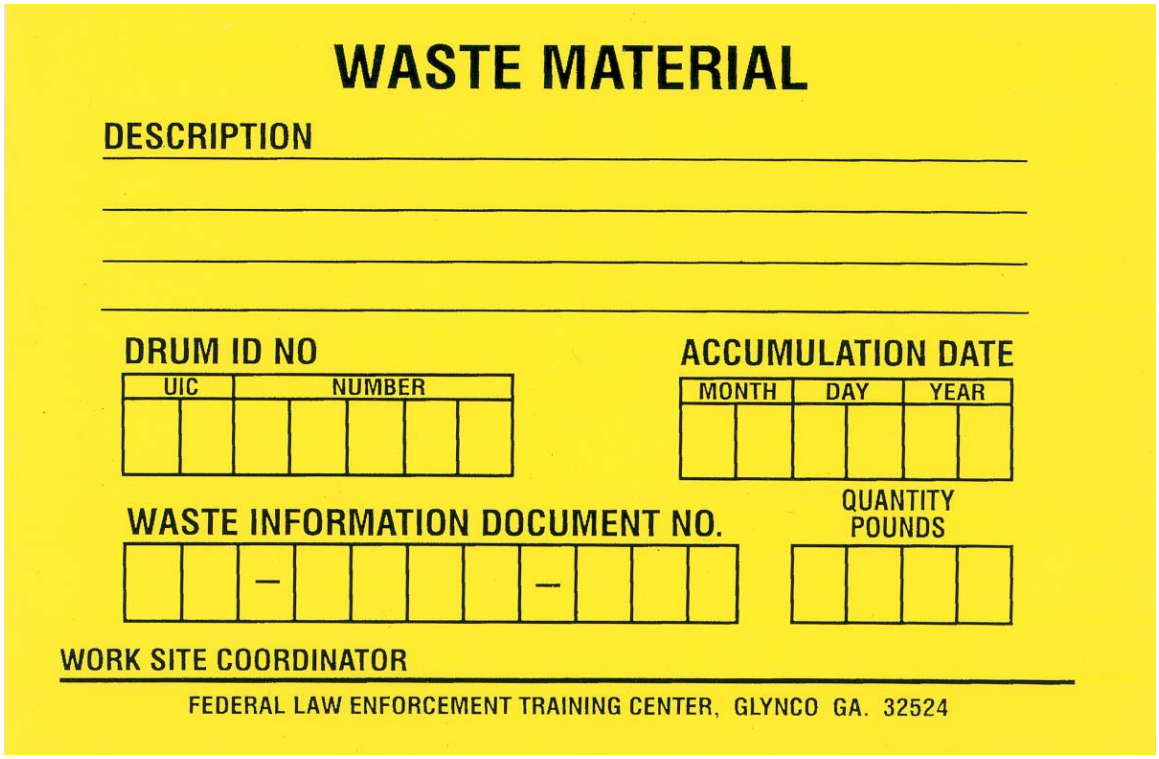
Properly labeled with the words “Hazardous Waste”				
Specific hazardous identification number of each component on container (EPA waste code)				
Accumulation start date on container				
Electrically grounded if highly flammable wastes				
SPILL RESPONSE				
Spill supplies and equipment readily available				
Proper safety equipment readily available				
Site-specific SPCC Plan on file				
Appropriate fire extinguisher within 50 feet of the storage area (gauge in proper limits)				
Alarm system/Communication device available				
Emergency eyewash operational/tested				
Overpack drums available				
EQUIPMENT				
Loading ramp inspected and operational				
Fork-truck inspected and operational				
All MHE inspected and operational				

Signature of Inspector: _____

Location of Site:_____ Date: _____

Attachment 2

Waste Material Label (Example)



Attachment 3

EPA ID NO. Label (Example)

HAZARDOUS WASTE

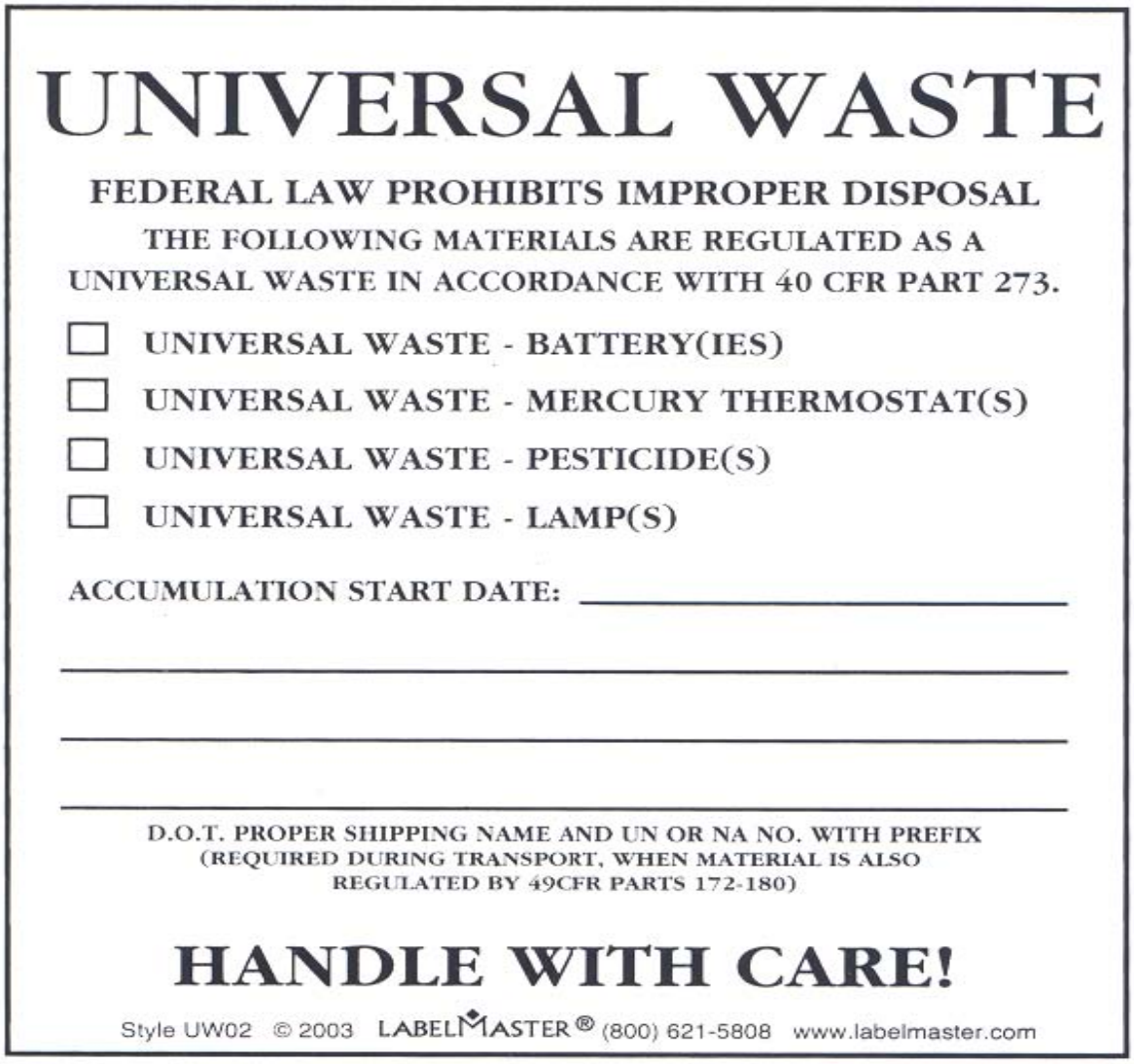
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

EPA WASTE NO. _____

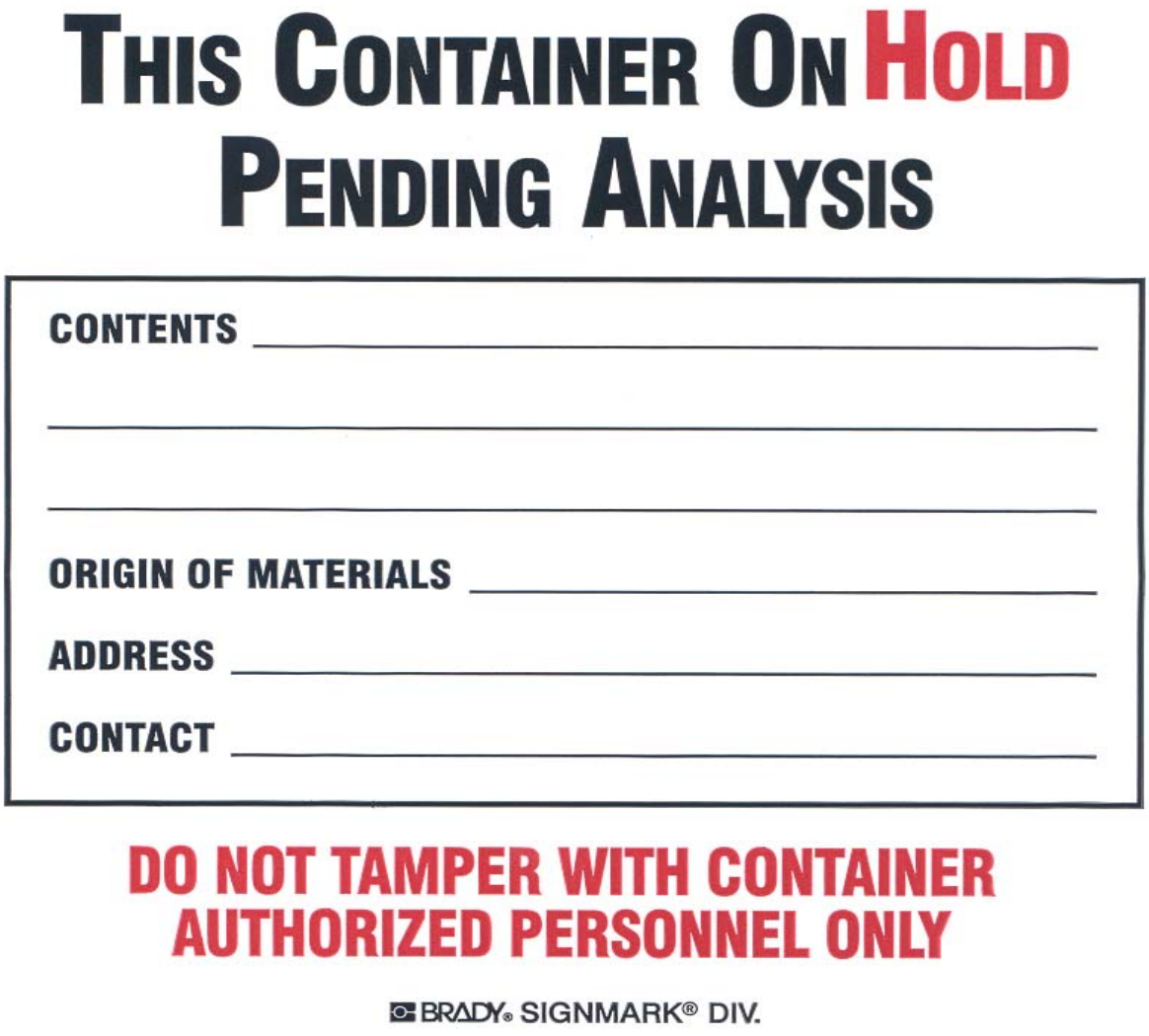
FLETC EPA ID NO. GA 6202932244

Attachment 4

Universal Waste Label



Pending Analysis Label



Attachment 6

HAZARDOUS WASTE MANAGEMENT PLAN

ANNUAL REVIEW LOG

DATE	CHANGES MADE	NAME
07/02/2019	Section V – Responsibilities – E – #3: Added an "a" after utilizing	Terri Mason
07/02/2019	Section V – Responsibilities – E – #4: Deleted "at a minimum" and added "according to State regulations"	Terri Mason
07/02/2019	Section V – Responsibilities – E – #4: Added an "a" after utilizing	Terri Mason
07/02/2019	Attachments 1 and 9 – Added the word (Example) to both at the top right	Terri Mason
07/02/2019	Attachment 13 – Updated Exhibits 2, 4, 11 and 13	Terri Mason

Attachment 7

"EXPOSURE SPECIFIC"
HAZARDOUS WASTE HANDLING TRAINING
COURSE OUTLINE

Introduction (Refer to the Hazardous Waste Compliance Handbook)

- Definitions
- Acronyms
- Law and regulations pertaining to hazardous waste/material
- Legal basis for compliance with hazardous waste regulations
- Enforcement and sanctions
- Hazardous waste management plan

Exposure to Hazardous Materials/Wastes

- Employee monitoring
- Hazardous material exposure
- Hazardous waste training requirements

Satellite Accumulation Area Requirements

- Staging waste (55-Gallon Rule)
- Unopened hazardous materials
- Daily handling of hazardous waste
- Supervisor inspections
- Satellite Accumulation Area (SAA) inspections
- Weekly hazardous waste inspections checklists
- State and federal SAA Checklists
- Leaks, spills, and contingency procedures
- Lever locking rings/funnels

Waste Disposal Documentation

- Waste Information Document (WID)
- Container labeling
- Hazardous waste pick-up
- Empty hazardous waste containers
- Drum types
- Unidentified waste material

Attachment 8

HAZARDOUS WASTE
TRAINING RECORD

NAME:

ORGANIZATION:

JOB TITLE:

JOB DESCRIPTION*:

DATE EMPLOYED AT FLETC:

INTRODUCTORY: The above named employee will receive training in the following subjects:

- Hazardous Waste Requirements (Hazardous Waste Compliance Handbook);
- Storm Water Pollution Prevention

TYPE AND OF TRAINING COMPLETED	***(INITIAL) OR (REFRESHER)***	***DATE***
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

_____	_____	_____
_____	_____	_____

* Detail exactly the HW duties of the employee.

E xample **Attachment 9**

SATELLITE ACCUMULATION AREA (SAA) INSPECTION CHECKLIST

Building: _____ Date: _____

HWC: _____

Hazardous Waste: _____ Yes No

A. Are all containers in good shape (i.e., not rusty, dented, or leaking)? ☐ ☐

B. Are the containers compatible with the waste being stored? ☐ ☐

C. Are the containers kept closed except to add or remove waste (bolt, rings, clips, lever locking rings, and lid secure) ? ☐ ☐

NOTE: Bolt and nut must be more than finger tight; lever locking ring must have safety clip installed and all funnels with clips must be latched

D. Is the proper waste material/hazardous waste label on all containers? ☐ ☐

E. Does the description on the label match the contents in the container? ☐ ☐

F. Does Waste Information Document (WID) number match waste in container? ☐ ☐

G. Does label have proper signature? ☐ ☐

H. Is hazardous waste label on drum or container (if applicable)? ☐ ☐

I. Is the 55-gallon rule being maintained and all containers marked that are ready for transport with the accumulation start date? ☐ ☐

J. Are all good housekeeping practices being maintained at each SAA? ☐ ☐

FLETC, Glynco, GA

WASTE INFORMATION DOCUMENT (WID)

As of: 02/17/04		**WID Number** 97-0221-016
Shop: RANGES "E" & "F"	**Contact:** DIANA DUNIGAN	**Code:** GOVERNMENT
Agency: FIREARMS DIV	**Building:** 221	**Phone:** 280-5372
Waste Description: GUN PATCHES AND DEBRIS		
Waste Material label required?: YES		**Hazardous Waste label required?:** YES
Waste Generation Process: PATCHES, Q-TIPS, RAGS, BORE AND TOOTHBRUSHES, MOP HEADS, DISPOSABLE CLOTHING, VACUUM HEPA FILTERS AND BAGS, ETC. GENERATED DURING GUN CLEANING AND DURING RANGE CLEANING.		
Waste Class: HAZARDOUS WASTE **EPA Waste Numbers:** D008		**Required Container:** STEEL DRUM
Special Handling & Instructions: THIS WASTE STREAM CONTAINS LEAD		

For Environmental Department Use Only **Material Composition**

Component	Percent	Parts Per Million
LEAD DEBRIS	100	

Physical State: SOLID	**Waste Water:** N/A	**Toxic:** YES	**Dioxin Listed:** N/A
Corrosive: N/A	**pH:** N/A	**Reactive:** NO	**Flash Point:** N/A
High TOC: N/A	**Low TOC:** N/A	**Land Ban:** YES	**Flammable:** NO
Reason for Classification: THESE RANGES SHOOT BOTH LEAD AND NON-LEAD AMMO (FAILED TCLP FOR LEAD)			
Treatment Standards:	**CAS # MIXTURE**		**Generation Code:**

Shipping Information

DOT Shipping : HAZARDOUS WASTE, SOLID, N.O.S., (LEAD) NA3077,PGIII			
	HAZ Class: 9	**Reportable Quantity:** 10	**Emergency Response Guide #:** 171
EPA Waste Numbers: D008			
Certification: I certify that the above named materials are the only compounds included in the waste stream described and no other substance is present.		**EVS Signature**	**Date**

Attachment 11

LIST OF ACRONYMS AND ABBREVIATIONS

ATF Alcohol, Tobacco, and Firearms
AUL Authorized Use List
CESQG Conditionally Exempt Small Quantity Generator
CFR Code of Federal Regulations
DOT Department of Transportation
EC Environmental Coordinator
EOD Explosive Ordnance Disposal
EPA Environmental Protection Agency
EPD Environmental Protection Division
EPM Environmental Program Manual
ESD Environmental and Safety Division
ESO Environmental and Safety Office
FIFRA Federal Insecticide, Fungicide, and Rodenticide Act
FLETC Federal Law Enforcement Training Centers
HAZCOM Hazard Communication Program
HM Hazardous Material
HW Hazardous Waste
HWC Hazardous Waste Coordinator
HWH Hazardous Waste Handler
HWM Hazardous Waste Manager
HWMP Hazardous Waste Management Plan
ICP Integrated Contingency Plan (One Plan)
LQG Large Quantity Generator
LQH Large Quantity Handler
MHE Material Handling Equipment
MSDS Material Safety Data Sheet
OSHA Occupational Safety and Health Administration
POL Petroleum, Oil, and Lubricant

P2 Pollution Prevention (Plan)

RCRA Resource Conservation and Recovery Act

SAA Satellite Accumulation Area

SQG Small Quantity Generator

SQH Small Quantity Handler

TCLP Toxicity Characteristic Leaching Procedure

TSDF Treatment, Storage, and/or Disposal Facility

WID Waste Information Document

CONTAMINANTS

EPAHWN	CONTAMINANT	REGULATORY LEVEL (mg/l)
D001	Flammable	NA
D002	Corrosive	NA
D003	Reactive	NA
D004	ARSENIC	5.0
D005	BARIUM	100.0
D018	BENZENE	0.5
D006	CADMIUM	1.0
D019	CARBON TETRACHLORIDE	0.5
D020	CHLORDANE	0.03
D021	CHLOROBENZENE	100.0
D022	CHLOROFORM	6.0
D007	CHROMIUM	5.0
D023	o-CRESOL	200.0
D024	m-CRESOL	200.0
D025	p-CRESOL	200.0
D026	CRESOL	200.0
D016	2,4-D	10.0

D027	1,4-DICHLOROBENZENE	7.5
D028	1,2-DICHLOROETHANE	0.5
D029	1,1-DICHLOROETHYLENE	0.7
D030	2,4-DINITROTOLUENE	0.13
D012	ENDRIN	0.02
D031	HEPTACHLOR	0.008
D032	HEXACHLOROBENZENE	0.13
D033	HEXACHLOROBUTADIENE	0.5
D034	HEXACHLOROETHANE	3.0
D008	LEAD	5.0
D013	LINDANE	0.4
D009	MERCURY	0.2
D014	METHOXYCHLOR	10.0
D035	METHYL ETHYL KETONE	200.0
D036	NITROBENZENE	2.0
D037	PENTACHLOROPHENOL	100.0
D038	PYRIDINE	5.0
D010	SELENIUM	1.0
D011	SILVER	5.0
D039	TETRACHLOROETHYLENE	0.7
D015	TOXAPHENE	0.5

D040	TRICHLOROETHYLENE	0.5
D041	2,4,5-TRICHLOROPHENOL	400.0
D042	2,4,6-TRICHLOROPHENOL	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	VINYL CHLORIDE	0.2

Federal Law Enforcement Training Centers

Hazardous Waste Contingency Plan

Glynco

Federal Law Enforcement Training Centers
1131 Chapel Crossing Road
Glynco, Georgia 31524

February 2018

Glynco Facility
Hazardous Waste Contingency Plan
Table of Contents

Federal Law Enforcement Training Centers
HAZARDOUS WASTE CONTINGENCY PLAN
Glynco

General Facility Information

The scope of this Contingency Plan for the Federal Law Enforcement Training Centers (FLETC) Glynco Facility includes a less than 90-day Waste Accumulation Area.

The address of FLETC Glynco Facility is:

Federal Law Enforcement Training Centers
Glynco
1131 Chapel Crossing Road
Glynco, Georgia 31524

The property consists of approximately 2300 acres with over 300 facilities within the campus. Operations at the site started in 1975 and the facility's population may approach 5,000 people. This facility conducts basic and advanced law enforcement training. **Figure 1** provides the location of FLETC's Glynco Facility.

Operations at FLETC's Glynco facility produces a number of hazardous waste products both as a direct result of training activities and as an output from support activities. Training activities occur at multiple locations within the campus and support activities such as vehicle and building maintenance, repair, and fueling operations also produce hazardous waste streams and/or operation susceptible to possible spillage. The wastes generated from these operations include waste which is hazardous due to ignitability, corrosivity, toxicity and/or is a listed hazardous waste. **Exhibit 1** provides a detailed list of the hazardous waste generated at FLETC's Glynco Facility.

Hazardous wastes are collected in drums or other appropriate containers that, when full, are placed in the less-than-90-day accumulation area. The drum accumulation area is located at Building 32 (**Figure 2**). Most of the waste streams are collected in satellite accumulation areas (SAA) throughout the Center. The locations of these SAA's and the specific types of wastes accumulated in each satellite area are noted in **Exhibit 1.**

FLETC's Glynco Facility is considered a large quantity generator. Generator ID: GA6202932244

Site Contact: **Mr. Stacey Moore**
1131 Chapel Crossing Road
Glynco, Georgia 31524
Office Phone: 912-506-8284

Intent and Purpose

The purpose of this plan is to protect the safety and welfare of the employees, students, contractors and community in the event of an emergency incident and to comply with federal and state laws pertaining to hazardous waste generators with respect to preparedness and prevention for emergency events.

The contingency plan is intended as a guide of emergency procedures in the event of fire, explosion, spill or release of hazardous waste. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments and area hospitals on operations relating to hazardous materials/wastes and emergency response at FLETC's Glynco Facility. This contingency plan has been prepared in accordance with the Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements in 40 CFR part 264, Subpart D and 40 CFR part 265, Subpart D.

Internal Emergency Procedures

In the event of an emergency involving hazardous waste or hazardous constituents at FLETC's Glynco Facility, the person first identifying the incident will notify security. Security will contact the emergency response coordinator (ERC) listed in **Exhibit 2**. The primary ERC will be contacted first. If the primary is not available, an alternate ERC should be called in the order listed.

Security can be reached by dialing extension **2911** (on-site) / **(912) 267-2911** (off-site). One individual should be assigned to remain a safe distance from, but within view of the emergency, to warn others of the danger until Security and/or ERC arrive.

The ERC have been selected based on their familiarity with FLETC's Glynco Facility, the contingency plan, operation and activities at the facility, the location and characteristics of the wastes handled, the location of records within the facility, and the facility layout. ERC have a portable cellular phone for notification purposes.

If outside assistance (police, fire, etc.) is needed, ERC will contact Security to make the necessary phone call(s) and coordinate the arrival(s) to the site. **Exhibit 3**, "Emergency Telephone List," provides telephone numbers for organizations (police, fire, etc.) that may be contacted in the event of an emergency. If clear and present danger to either human health or property exists, the ERC will contact the Spill Response Contractor and Security. The ESD will make notifications to NRC and GADEP.

Identification of Hazardous Materials

The hazardous waste being stored is hazardous due to ignitability, corrosivity, toxicity and/or it is a listed hazardous waste. **Exhibit 1** provides a detailed list of all hazardous wastes generated at FLETC's Glynco Facility. In the event of a fire/explosion and/or spill, the ERC will be able to identify:

- the character of the released material;
- the exact source of the released material;
- the amount of the released material; and
- the extent area of any released materials.

If needed, the ERC will also refer to facility records and employee reports.

Figure 1: Site Location Map

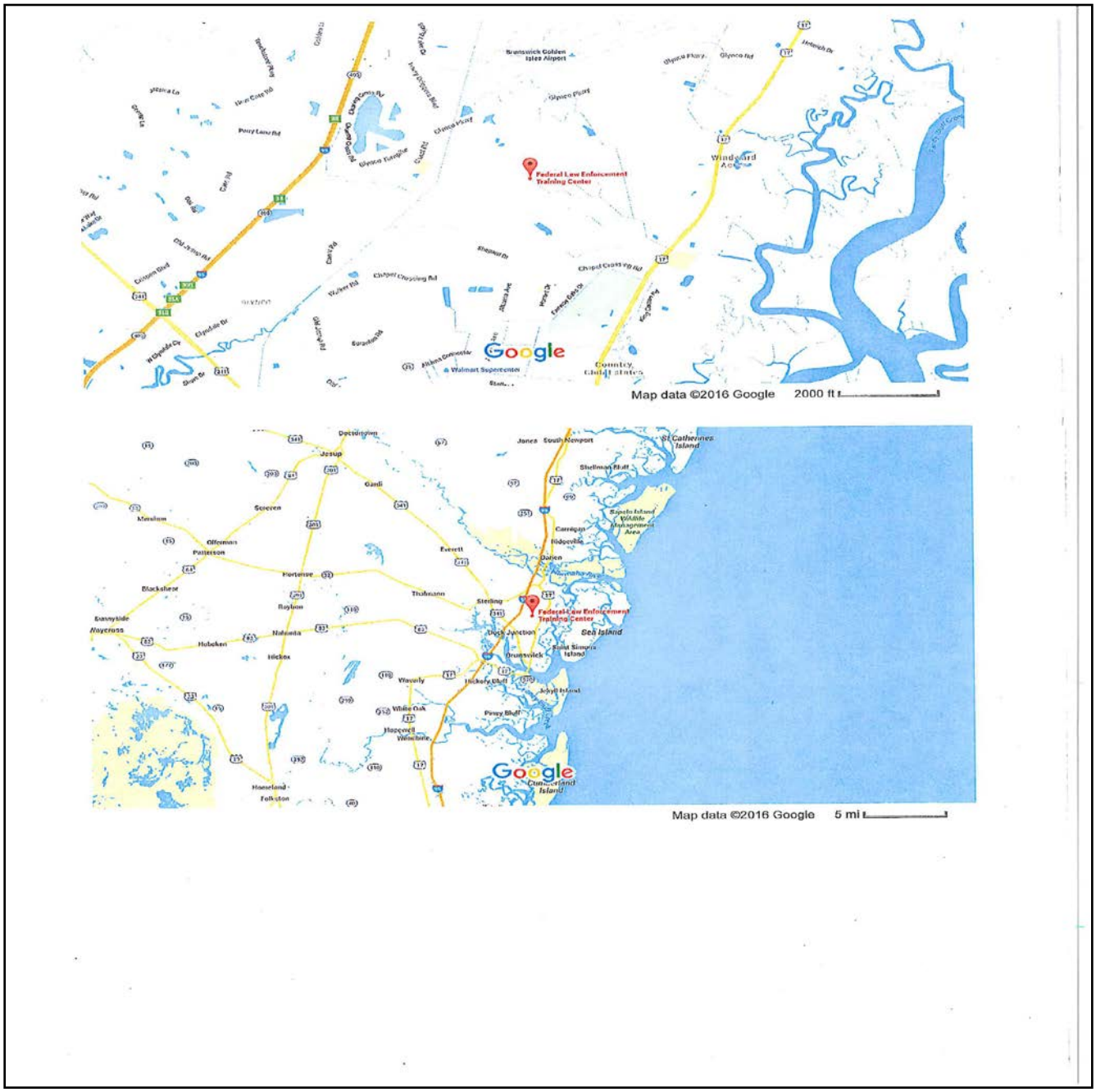
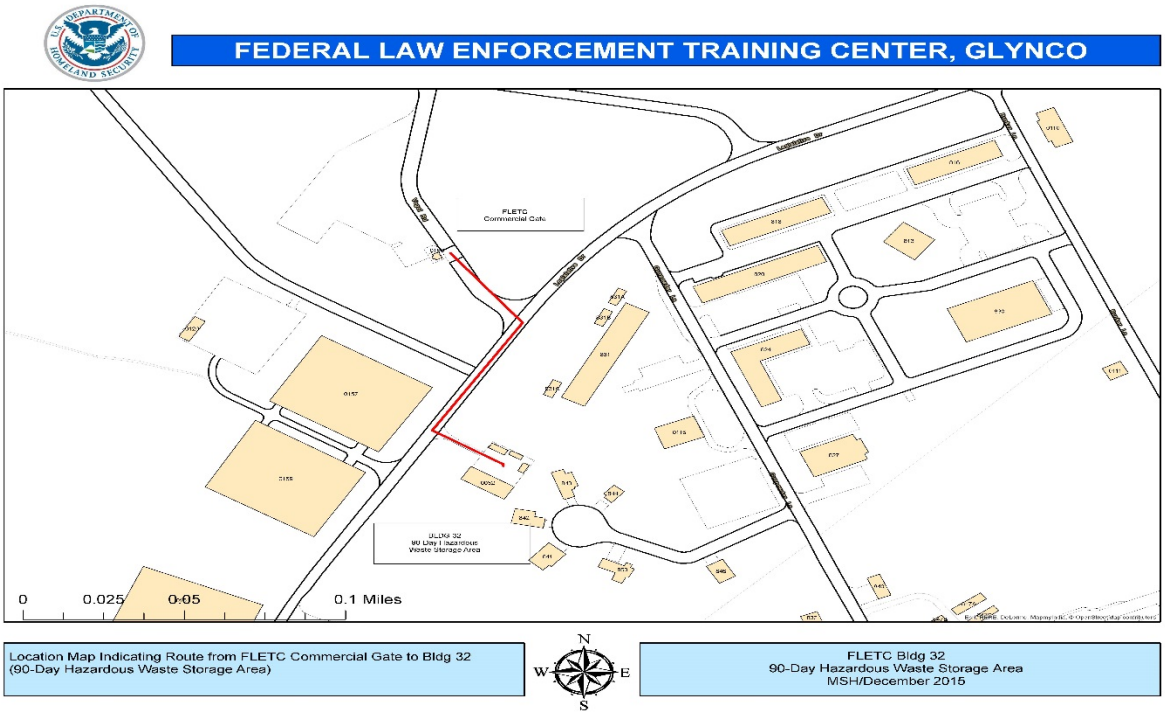


Figure 2: Evacuation Route



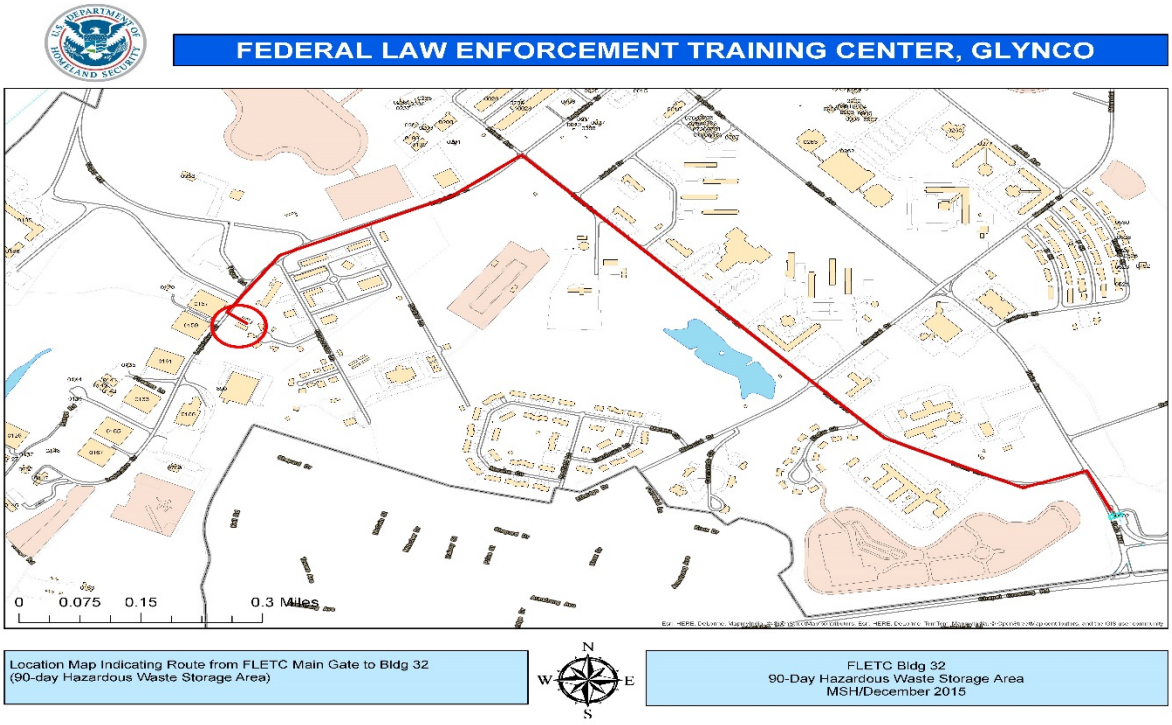
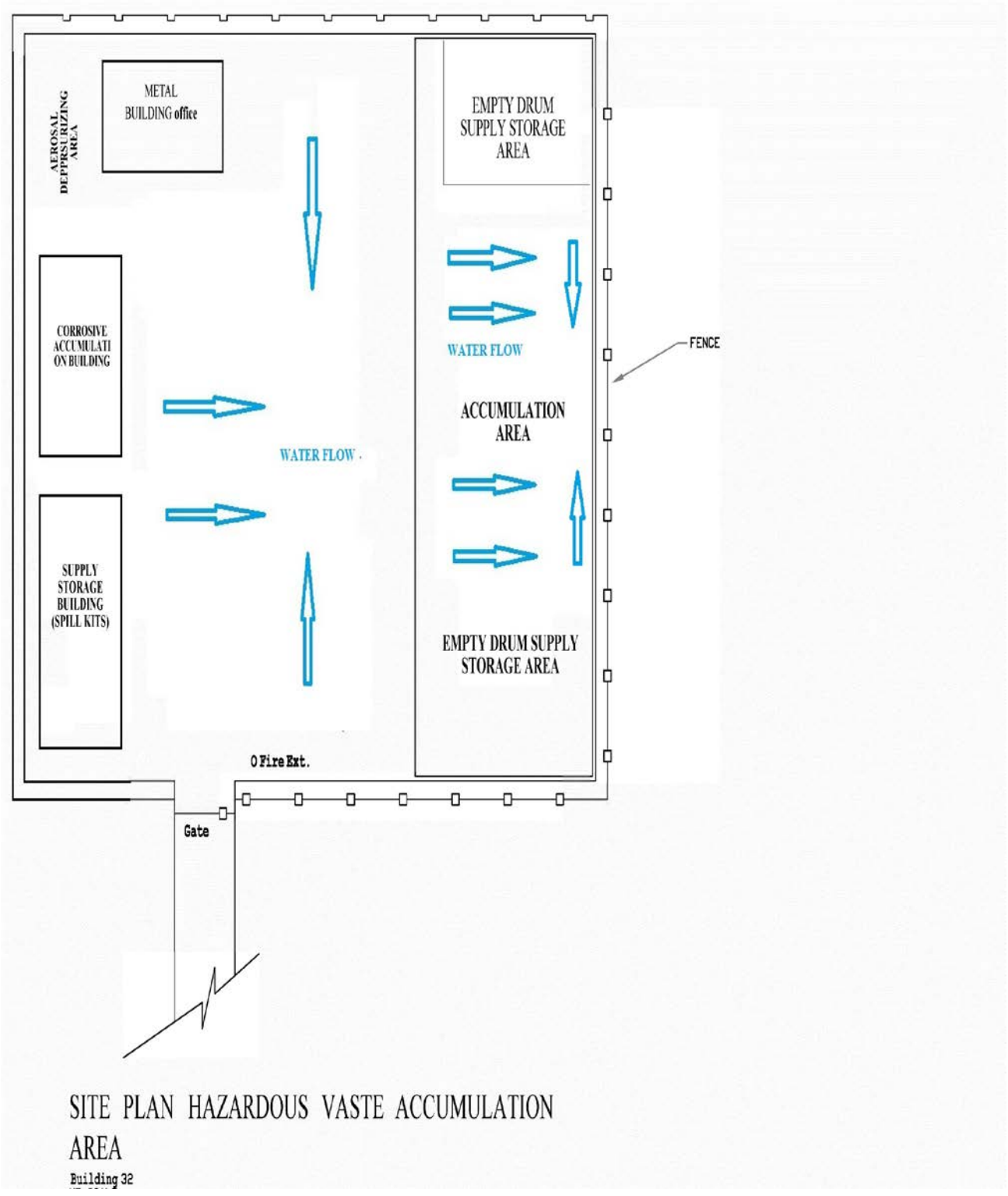


Figure 3: Waste Accumulation Facility



Control Procedures

This contingency plan will be implemented in the event of a spill of hazardous waste, fire, any explosion, or a combination of these. Additionally, the contingency plan will be implemented if the ERC determines that a threat to human health or the environment exists. Implementation of this contingency plan is intended to mitigate or protect the facility and neighboring community from injury; contamination of storm sewers with hazardous materials; damage to equipment; damage to the environment; or a combination of these. This section of the contingency plan addresses control procedures relative to hazardous waste emergency episodes within the 90-day accumulation area.

90-day Accumulation Area

The hazardous waste 90-day accumulation area is located within the secured area consisting of five buildings/structures. Due to the accumulation of ignitable hazardous waste, the area is located greater than 50 feet from the property line. Flammable liquids are stored in the flammable storage building located across Building 32. The area can potentially store 1,500 gallons. The largest container is 55 gallons.

Building 32 is an open front shed with a concrete pad that slopes towards the center back of the building for secondary containment. There is a drainage system, with a valve located at the backside of the building that allows the water to be drained, after being inspected for sheen.

Drums and cubic yard boxes of each waste stream are placed in aisles in the accumulation area. Appropriate aisle space is maintained between the pallets. The emergency/spill response equipment is located in a portable metal storage building. The contents and capabilities of the equipment in the building are noted in **Exhibit 6.** The location of the building and fire extinguisher are noted on **Figure 2** and **Figure 3**.

During an emergency, the ERC must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous material/waste at the facility. These measures must include, where applicable:

A. Stopping processes and operations,

B. Removing and isolating applicable containers,

C. Collecting and containing released waste.

The ERC must evaluate the facility's emergency equipment to determine if FLETC personnel can handle the corrective action in the event of a fire/explosion and clean-up efforts in the event of a spill. A list of the emergency equipment is found under **Exhibit 6**.

Control Procedures: Fire/Explosion

The following actions will be taken in the event of a fire or explosion:

A. The facility emergency alarm is sounded by telephone or internal communication to security at **2911 / (921) 267-2911**. Work in all areas will be shut down until the area is safely restored.

B. The ERC will be contacted (see **Exhibit 2**).

C. If the employee has the appropriate training, the employee may use nearby firefighting equipment to provide early containment of a fire to significantly reduce the total damage. HOWEVER, FIRE FIGHTING ACTIVITIES THAT MAY CAUSE INJURY TO THE PERSONS INVOLVED SHOULD NOT BE PERFORMED.

D. If FLETC personnel cannot safely and effectively perform corrective action and/or has not had the appropriate response training in the event of a fire and/or explosion, the ERC must:

1. Assess possible hazards to human health and the environment that may result from the fire and/or explosion. This includes:

a. Person(s) injured and seriousness of injury.

b. Location of any spill or leak, material involved, and source.

c. Type of material that has spilled, is leaking and/or is involved in the fire/explosion.

d. The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.

e. Any possible airborne constituents associated in smoke plume.

2. Contact security at **2911** / **(912) 267-2911** who in turn will contact the local fire department. Contact other emergency response organizations as listed under **Exhibit 3**.

3. Operating equipment will be shut down as necessary and practical.

4. If the ERC determines that an area or site evacuation is required, the security force must be notified to sound the proper alarm.

5. All injured persons will be removed and medical treatment will be administered by trained personnel.

6. If FLETC personnel can safely and effectively perform corrective action and clean-up, the following steps are to be taken under the authorization of the ERC (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):

a. Eliminate all possible sources of ignition.

b. Clean up the released/affected media from the fire or explosion per the spill control procedures listed on pages 10 and 11.

7. For fires and explosions, the ERC must make the necessary reports as outlined in **Exhibits 4&5**.

Control Procedures: Spills

The following actions will be taken in response to a spill of hazardous material:

A. The facility emergency alarm is sounded via call to onsite security by cell phone, telephone at **2911** / **(912) 267-2911**, internal communication, and/or alarm pull box if located in area. Notification is required to the Environmental & Safety Division. Work in all areas will be shut down until the area is safely restored.

B. The ERC will be contacted. Based on the description of spill, the ERC will judge if the spill is large enough to call the Spill Response Contractor (**Exhibit 3)**. If it is determined that their services are needed, the contractor shall be called immediately with a description of the material and the amount discharged.

C. The ERC must immediately identify the character, exact source, and extent of any released materials. This information must be obtained without entering the contaminated area. The ERC will obtain the following information:

1. Person(s) injured and seriousness of injury.

2. Location of the spill or leak, material involved, and source.

3. Type of material that has spilled or is leaking.

4. The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.

D. Emergency response employees will only respond to chemical incidents where proper chemical identification and concentrations can be determined.

E. For small spills: If FLETC personnel can safely and effectively perform corrective action and clean up, the following steps are to be taken under the authorization of the ERC (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):

1. Immediately begin containment by placing absorbent material on/around the spill within the secondary containment.

2. Immediately set up a barrier to alert unauthorized personnel to keep out, if evacuation has not occurred.

3. Eliminate all possible sources of ignition and leakage.

4. Set up decontamination zone to ensure proper decontamination procedures (if applicable).

5. Use shovels and/or heavy equipment available at the facility to place contaminated absorbent into open top D.O.T. approved drums.

6. Drummed cleanup materials shall be managed as hazardous waste until proper analysis shows otherwise.

7. Drums of cleanup material are to be properly labeled.

8. Assigned personnel are to continue to cleanup and remove all residue until all contamination hazards are eliminated.

F. For large spills: If FLETC personnel cannot safely and effectively perform corrective action in the event of a spill, the ERC must:

1. Assess possible hazards to human health and the environment that may result from the spill.

2. Contact security at **2911** / **(912) 267-2911** who in turn will contact the local fire department. Contact other emergency response organizations as listed under **Exhibit 3**.

G. For small or large spills, the ERC must make the necessary reports as outlined in **Exhibits 4 and 5**. Note under RCRA, CERCLA and SARA, a report is required if the release leaves FLETC or exceeds the Reportable Quantity for that substance. Organizations that need to be notified are listed under **Exhibit 3**.

H. After cleanup has occurred, the ERC must ensure that:

1. The released material is properly stored.

2. All emergency equipment listed in the emergency response contingency plan is cleaned and fit for its intended use before resuming operations.

3. All disposable equipment used during the incident is replaced with new equipment in the appropriate area.

Post-Emergency Equipment Maintenance

Immediately after an emergency event requiring the implementation of the contingency plan, all emergency equipment utilized will be inspected for proper function, completeness and condition. The equipment used for spill clean-up will be documented on the emergency report form (**see Exhibit 5**). The equipment will be evaluated for hazardous characteristics, decontaminated, or properly disposed of in containers. Decontamination procedures include a pressurized water rinse, scrubbing equipment with brushes and water-compatible solvent cleaning solutions or steam cleaning. If the equipment remains contaminated, additional decontamination efforts will be completed. Contamination will be determined through visual observation and sampling, if necessary (**see Exhibit 5**).

Rinsates from equipment decontamination will be collected in containers. The rinsates which contacted hazardous waste and resulting residue will be managed as hazardous waste unless laboratory results indicate otherwise. Other rinsates will be managed in accordance with all applicable laws.

Processes which generate hazardous wastes that were affected must not be resumed until the equipment has been properly decontaminated and has been checked for proper operation.

All emergency spill equipment will be replenished accordingly.

Coordination Agreements

The contingency plan promotes routine contact with the area police and fire departments and hospitals. **Exhibit 7** provides a list of contacts for the contingency plan distribution. **Exhibit 8** provides a sample distribution letter that accompanies the Contingency Plan distribution.

The Glynn county Fire Department is the responding authority in the event of a fire at FLETC's Glynco Facility. The fire department has full authority as soon as they arrive at the site. FLETC's Glynco Facility utilizes the Health Unit whenever medical emergencies occur.

FLETC's Glynco Facility has submitted under SARA Title III, emergency and hazardous chemical inventory forms to the local, county and state agencies.

The Office of Security and Professional Responsibility (OSPR) is the responding authority should their services be needed at FLETC's Glynco Facility. In addition, the Glynn County Police Department may respond to emergencies at FLETC's Glynco Facility.

Contingency Plan Revisions/Amendments

This plan must be reviewed and immediately amended, if necessary whenever:

1. applicable rules are changed;
2. the plan fails in an emergency;
3. facility changes in DESIGN, CONSTRUCTION, OPERATION, MAINTENANCE PRACTICES or OTHER CIRCUMSTANCES in a way that increases the potential for fires, explosions or releases of hazardous wastes or hazardous constituents or changes the response necessary in an emergency;
4. the ERC list changes; or
5. the emergency equipment list changes.

Training

Training shall be provided as applicable to employees meeting the duties or responsibilities as outlined in **Exhibit 9** of this plan.

List of Acronyms and Abbreviations

CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CFR	Code of Federal Regulation
DOT	Department of Transportation
ERC	Emergency Response Coordinator
ESD	Environmental and Safety Division
FLETC	Federal Law Enforcement Training Centers
GAEPD	Georgia Environmental Protection Division
LEPC	Local Emergency Planning Committee
OSHA	Occupational Safety and Health Administration
OSPR	Office of Security and Professional Responsibility
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Area
SARA	Superfund Amendments and Reauthorization Act

Exhibit 1: SAA List

Hazardous Waste SAA Table
Items that may be present in the < 90-Day accumulation area.

Facility			
Motor Pool	**4**	**Bldg. 101**	**Used Oil and Oil Dry Contaminated with Diesel and Gasoline - D001 and D018**
Garage	**7**	**Bldg. 205**	**Used Oil, Oily Waste Water, Used Brake Fluid, Used Anti-Freeze - D010; Gas Filters and Absorbent - D018; Gasoline and Water - D001 and D018; Oil Filters and Absorbent, Aerosol Cans - D001**
Range 1-6	**12**	**Bldg. 157, 159, 161, 163, 165, & 167**	**Floor Sweeping - D001; Recyclable Bullet NON-TOX**
Crime Lab	**3**	**Bldg. 890**	**Waste Test Kits - D001, D002, D022, D040**
Omni (Trailer)	**2**	**Bldg. 708**	**Aerosol Cans - D001; Floor Wax**
Welding Shop	**3**	**Bldg. 199**	**Aerosol Cans - D001; Oily Rags and Absorbent; Refrigerant Oil - F002**
Inmate Workshop	**5**	**Bldg. 238**	**Latex Paint; Aerosol Cans D001; Liquid Paint Mixed - D001,D039,D040 and Paint Related Trash**
Storage Facility	**6**	**Bldg. 210**	**Waste Lamps, Non-PCB Ballast, Mercury Light Bulbs**
Range "F" (Inside)	**3**	**Bldg. 221**	**Lead Contaminated Floor Sweepings - D001, D008; Range Water - D008**
Boiler / Chiller	**2**	**Bldg. 272**	**Refrigerant Oil - F002; Oil Filters Rags and Absorbent**
Range # 7	**4**	**Bldg. 125**	**Aerosol Cans - D001; Lead Contaminated Floor Sweepings - D003,D008 and Gun Patches D008**
Range # 8	**4**	**Bldg. 127**	**Aerosol Cans - D001; Lead Contaminated Floor Sweepings - D003, D008 and Gun Patches - D008**
ICE Academy	**1**	**Bldg. 765**	**Pepper Spray - D001**

Range # 9 & # 10	**2**	**Bldg. 126**	**Floor Sweeping - D001**
Weapons Issue (Service Care)	**2**	**Bldg. 221**	**Lead Contaminated Debris - D008 and Aerosol Cans - D001**
Roads & Grounds	**3**	**Bldg. 35**	**Used Oil, Gas Filters and Absorbent - D018; Oil Filters, Rags and Absorbent**
Cafeteria	**1**	**Bldg. 75**	**Aerosol Cans - D001**
Top Flight	**1**	**Bldg. 31**	**Aerosol Cans - D001, Floor Wax**
PTD Storage Area	**1**	**Bldg. 779A**	**Pepper Spray - D001**
Gas Range	**4**	**Bldg. 615**	**Pepper Spray - D001 and Non-Lethal Training Ammunition**
CTOTF International	**2**	**Bldg. 76**	**Aerosol Cans - D001 and Non-Lethal Training Ammunition**
Goodwill	**1**	**Bldg. 254**	**Aerosol Cans - D001**
Weapons Issue MAC	**4**	**Bldg. 166**	**Lead Debris - D008; Non-Lethal Training Ammunition; Flash Bangs, Aerosol Cans - D001**
Omni Storage Area	**4**	**Bldg. 71**	**NON-PCB Ballast, Waste Lamps and Batteries**
Hazardous Waste Site	**1**	**Bldg. 32**	**Aerosol Cans - D001**
Danis City	**2**	**Bldg. 900**	**Aerosol Cans - D001 and Non-Lethal Training Ammunition**
NCIS	**1**	**Bldg. 304**	**Lead Debris - D008**
ATF	**2**	**Bldg. 760**	**Lead Debris - D008 and Weapon Cleaning Solvent D001**
DMD	**1**	**Range**	**Used Flares -D001**

Other wastes accumulated in the less than 90 day area:

Universal Waste - Batteries in closed 5-gallon plastic buckets
Used oil in 55-gallon steel drums
Spent fluorescent bulbs in the cardboard containers supplied by the recycler
Universal Waste - thermostats in closed 5-gallon plastic buckets

Exhibit 2: Emergency Response Coordinator Contact List

Emergency Response Coordinators (ERC)

Emergency Coordinator		Telephone Numbers		Location
PRIMARY				
(1)	David Barber 2046 Boots Harrison Rd. Hortense, GA 31543	Business: Residence: Cell:	912-267-3322 n/a 912-658-1518	Brunswick Hortense
SECONDARY				
(2)	Title: TBD - Environmental Lead	Business: Residence: Cell:		
(3)	Willis Hunter 111 Majestic Drive Brunswick, GA 31523	Business: Residence: Cell:	912-267-3154 912-466-9672 912-258-1568	Brunswick Brunswick

Exhibit 3: Emergency Telephone List

Note: Four digit numbers are for on center phones.
If FLETC Security is notified, they will call other responders as needed.

Police Department

FLETC Security	2911/912-267-2911
Glynn County Police	911/912

Fire Department

Glynn County Fire Department	911/912-267-5717

Hospitals

Health Unit	2385/267-2385
Local Hospital	912-466-7000

Other Emergency Services

Ambulance Service	2911/911
Local Water & Sewer	912-261-7100
Georgia Power	888-660-5890
Georgia Environmental Protection Dept. Emergency Operation Center 24-hour Spill Reporting and Response	800-241-4113
National Response Center (USCG / USEPA) 24-hour Spill Reporting	800-424-8802

Local and State of GA Contact(s) on **Exhibit 10** and **Exhibit 11**

FLETC Spill Response Contractor: LG2 (Contract #: W912HN-16-P-0064)

Business Hrs:	904-288-8631
24 Hrs:	904-610-1184

Exhibit 4: Emergency Reporting Form

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

EPD Emergency Response
16 Center Road
Cartersville, Georgia 30121
770-387-4900

Correspondence:
Post Office Box 3250
Cartersville, Georgia 30120

Georgia Environmental Protection Division
Emergency Response Program

Release and Remediation Report

Instructions

This report should be used by the responsible party in conjunction with the responsible party's environmental contractor to document the circumstances surrounding the release, release reporting, and efforts taken which resulted in the containment of the release and the clean-up of free product and contaminated materials. The preferred method of submission of this report is via an electronic submission directly to the Emergency Response Program State On-Scene Coordinator who responded to the spill. Their names and e-mail addresses are located below.

Angel.White@dnr.ga.gov

Celia.Mayben@dnr.ga.gov

Eric.Dykes@dnr.ga.gov

Jason.Pietras@dnr.ga.gov

John.Maddox@dnr.ga.gov

Georgia Environmental Protection Division
Emergency Response Program

Release and Remediation Report

I certify to the best of my knowledge that the provided information below and attachments are correct and accurate.	
Authorized Representative Name	
Signature The Georgia Electronic Records and Signatures Act, O.C.G.A. § 10-12-1 *et seq.* provides for the use of electronic signatures.	

(Enter responses regarding the incident in the spaces to the right.)

Incident Initial Information	**Response (as applicable)**
EPD Complaint Tracking System ID Number	
Date/Time Incident Occurred	
Incident Location: Physical Address, Mile Marker, Closest Intersection, or Latitude/Longitude	
Responsible Party Information	**Response (as applicable)**
Responsible Party or Facility Name	
Responsible Party Contact Person	
Responsible Party Mailing Address	
Responsible Party Telephone	
Remediation Contractor Information	**Response (as applicable)**
Remediation Contractor Firm Name	
Remediation Contractor Contact Person	
Remediation Contractor Mailing Address	
Remediation Contractor Telephone	

Material(s) Released to the Environment	**Amount Released / UoM**
☐ Unknown ☐ Gasoline ☐ Diesel ☐ Aviation Gas / Jet Fuel ☐ Fuel Oil	
☐ New Lube Oil ☐ Hydraulic Fluid, Used or Waste Oil ☐ Transformer Oil	
☐ Sewage or Wastewater ☐ Hazardous Substances (list CASRN)	
☐ Other Materials (Specify below)	

Affected Environmental Media (check all that apply)
☐ Air ☐ Coastal Waters ☐ Surface Waters (Specify below) ☐ Storm Drains ☐ Open Ditches ☐ Groundwater ☐ Wetlands ☐ Soil ☐ Impervious Surface ☐ Other (Specify below)

(Continued on the following page; attach additional pages as needed.)

Georgia Environmental Protection Division

Emergency Response Program

Release and Remediation Report

Describe Cause of Release:	
Describe Response Actions Taken: (attach disposal receipts, sample results)	

Exhibit 5: Emergency Incident Reporting Form

Emergency Report Incident No. _____

1. Type of emergency: Fire _____, Spill _____, Other _____

2. Alarm: Date _____, Time _____, Shift _____

3. Alarm sounded: □ Yes □ No, By _____

4. Location of emergency _____

5. Description of emergency and property involved _____

_____

6. Materials involved and their hazards _____

_____

7. Cause of emergency _____

8. If fire, source of ignition _____

9. Narrative account of fire/spill control measures _____

_____

10. Extinguishing agents used (itemize) _____

11. List other equipment used _____

_____

12. All clear announced by _____

13. Alarm station reset _____

14. Emergency equipment restored to operating condition _____

15. Recommendations and remarks _____

16. Report Submitted By _____, Title _____

Exhibit 6: Emergency Equipment List

Emergency Equipment

Personnel Protective Equipment	Capabilities of Equipment	
Disposable coveralls		***
Gloves (inner & outer)		***
Goggles		***
Face shields		***
Hard Hats		***
Ear protection		***
Duct tape		***
Air purifying respirators	***	
Disposable air purifying respirator cartridges		***
SCBA (includes full oxygen tank)		***
Boots		***
Fire blanket		***
Assorted first aid supplies		***
Safety showers and eye washes	***	
Fire Response Equipment		
Fire extinguishers		***
Spill Response Equipment		
Sorbent booms, pads & pillows	***	
Squeegees, brooms, buckets, mops		***
Spark-proof shovels		***
Sorbent sand		***
Speedi-dry/Oil dry		***
Acid neutralizing materials		***
Base neutralizing materials		***
Empty 55-gallon open head drums		***
85-gallon disposable (over pack) drums	***	
Drum repair kit	***	
Communication Equipment		
Telephones (landline) / Cell phones		***
Alarm Pull Boxes Connected to Alarm System	***	
2-way radios		***

Exhibit 7: Emergency Response Contingency Plan Distribution List

Emergency Response Contingency Plan Distribution

- On-site Personnel
- Local Fire Department
- Security & Emergency Management (SEM)
- Local Health Unit
- Georgia EPD, Emergency Response
    - Contact list on Exhibit 11
- Local Sewer District
- Local Emergency Planning committee (LEPC)
    - Contact list on Exhibit 10

Exhibit 8: Contingency Plan Distribution Letter

Distribution Letter

Federal Law Enforcement Training Centers
Glynco Facility
1131 Chapel Crossing Road
Brunswick, GA 31524 (INSERT DATE)

Certified Mail
Return Receipt Requested

(INSERT AGENCY)

Dear (INSERT NAME):

The Federal Law Enforcement Training Centers (FLETC) Glynco Facility is a law enforcement training agency that provides training for many Federal Agencies. FLETC's Glynco Facility performs its operations in Brunswick, Georgia. As part of these operations, FLETC's Glynco Facility generates and manages hazardous wastes. FLETC's Glynco Facility requests your agreement to respond to hazardous waste emergencies at FLETC's Glynco Facility, as is appropriate for your function, upon request by FLETC's Glynco Facility personnel.

Enclosed for your information is a copy of FLETC's Glynco Facility Contingency Plan which can be used to familiarize your emergency response personnel with the layout of FLETC's Glynco Facility, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.

Please respond to this request in writing. A self-addressed stamped envelope is also enclosed for your use.

If you should have any questions, please call me at (912) 267-3322.

Sincerely,

FLETC Glynco Facility
Mr. David Barber
Primary Emergency Coordinator

Print /Type Name _____ Signature _____

Title _____ Date _____

Exhibit 9: Training Requirements

RCRA Training Requirement	OSHA Training Requirement	Comment
264.16(a)(1) Basic Requirement--Personnel must successfully complete a program of instruction or training which meets certain minimum requirements	1910.120 (p)(7)(I) Basic Requirement--Personnel who are exposed to health hazards or hazardous substances at TSD operations must successfully complete a 24 hr initial training program which will enable the employees to safely perform their assigned duties.	OSHA requirement meets or exceeds RCRA. Note that non-exposed employees do not require OSHA 1910.120 training.
264.16(a)(1) Setting for instruction--Program must consist of classroom instruction or on-the -job training.	1910.120 *App. E - Training Curriculum Guidelines - (Non-mandatory)* suggests that training should be conducted in a facility that has sufficient resources, equipment, and site locations to perform didactic and hands-on training when appropriate. OSHA does not address using on-the-job training to meet the requirements of initial training except at 1910.120 (p)(7)(ii) which allows employers who can show by an employee's previous work experience or training that the employee has had training equivalent to the initial training.	OSHA requirement may be more restrictive than RCRA which allows on-the-job training.
264.16(a)(2) Training director--The program must be directed by a person trained in hazardous waste management procedures.	1910.120(p)(7)(iii) Trainers must have completed a training course for teaching the subjects they are expected to teach or they must have the academic credentials and instruction experience necessary to demonstrate a good command of the subject matter and competent instructional skills.	OSHA requirement meets or exceeds RCRA.
264.16(a)(3) Program Design--The training program must be designed to ensure at a minimum that facility personnel are able to respond effectively to emergencies.	1910.120(p)(7)(I) Training should enable employees to perform their assigned duties in a safe and healthful manner so as not to endanger themselves or other employees.	OSHA requirement meets or exceeds RCRA.
264.16(c) Facility personnel must successfully complete the program within six months of their assignment to a facility.	1910.120(p) and 1910.120 App E - *TrainingCurriculum Guidelines - (Non-mandatory)* Initial training should be provided prior to beginning work.	OSHA requirement more stringent than RCRA.
264.16(c) Facility personnel must take part in and annual review of the training program.	1910.120(p)(7) Refresher training is required annually. OSHA specifies 8 hr training.	OSHA requirement is more stringent than RCRA.

RCRA Training Requirement	OSHA Training Requirement	Comment
264.16(a)(1) Employees Covered-- Training is required for Facility personnel. 1910.120(p)(7)	1910.120(p)(7) Employees Covered--Only employees exposed to health hazards or hazardous substances.	Some employees may require training under RCRA but not under OSHA.
264.16(d) Training Records Maintenance--The owner/operator must maintain documentation of training at the facility.	1910.120 App E - *Training Curriculum Guidelines - (Non-mandatory)* Records should be maintained by the training provider.	OSHA requirement is the same as RCRA.
264.16(e) Training Records Retention--Training records on current personnel must be kept until facility closure; records for former employees must be kept for three years.	1910.120 App. E - *Training Curriculum Guidelines - (Non-mandatory)* Training records should be maintained for a minimum of five years after an individual participated in a training program.	OSHA requirement is generally less restrictive than RCRA
264.16(d) Recordkeeping--The owner/ operator must maintain the following: (1)The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (2) A written job description for each position; (3) a description of the amount and type of both initial and continuing training that will be given to each person; (4) documentation that required training was provided to appropriate facility personnel.	1910.120 App. E - *Training Curriculum Guidelines - (Non-mandatory)* Records should list the dates courses were presented, the names of attendees, names of those students successfully completing each course, and the number of training certificates issued to each successful student.	RCRA requires more detailed recordkeeping than OSHA.
Training Course Content 264.16 (a)(3) and *Permit Applicant Guidance Manual for GeneralFacility Standards of 40 CFR 264*. (See specific training core requirements/guidelines below)	Initial Training Course Content 1910.120(p)(7) and 1910.120 App. E - *Training Curriculum Guidelines – RCRA Operations Training for Treatment, Storage, and Disposal Facilities* and other OSHA regulations as specified (See specific training core requirements/guidelines below)	See specific training core requirements/guide -lines below. Note that OSHA allows employers who can show by previous experience or training that employees have had equivalent training do not need to reaccomplish initial training.

Specific Training Core Requirements/Guidelines - **RCRA** Requirement	Specific Training Core Requirements/Guidelines - **OSHA** Requirement	Comment
1. Elements of the RCRA Contingency Plan	1. Emergency response plan (RCRA Contingency Plan is acceptable) including emergency alerting and response procedures, emergency equipment, pre-emergency planning and review of emergency contingency plans.	OSHA requirement is generally the same as RCRA.
2. Communications or alarm systems	2. Emergency response plan including emergency alerting and response procedures	OSHA requirement is generally the same as RCRA.
3. Standard operating procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment	3. Emergency response plan including emergency alerting and response procedures, emergency equipment, pre-emergency planning	RCRA requires more detail than OSHA.
4. Key parameters for automatic waste feed cut-off systems	4. Not covered in training curriculum	RCRA requires more detail than OSHA.
5. Response to fires, explosions, groundwater contamination incidents and shutdown of operations	5. Emergency Response program training; review of fire and explosion hazards	OSHA requirement is generally the same as RCRA.
6. Chemical characteristics of wastes	7. Review of chemical and biological hazards; principles of toxicology	OSHA requirement is generally the same as RCRA.
7. Types and limitations of personal protective equipment	8. Review and hands-on exercise with personal protective equipment. Annual refresher training for respirator wearers is required.	OSHA requires more detail than RCRA.
8. Proper operation of industrial trucks and other machinery	9. Forklift and industrial truck driver training program (1910.178(l)0	OSHA requires more detail than RCRA.
9. Basic first aid	10. Emergency response plan and procedures including first aid	OSHA requirement is generally the same as RCRA.

Exhibit 10: Local Emergency Planning Committee Contact List

Local Emergency Planning committee (LECP) Contact List

Agency	Contact	Title	Phone
Albany-Dougherty County LEPC	Jim Vaught	EMA Deputy Director	229-431-2155
Atlanta-Fulton County LEPC	Pansy Ricks	EMA Administrative Assistant	404-730-5600
Augusta-Richmond County LEPC	Sharon Bennett	EMA Specialist	706-821-1156
Barrow County LEPC	Penny Clack	EMA Deputy Director	770-307-2987
Brunswick-Glynn County LEPC	Jay Wiggins	EMA	912-554-7826
Butts County LEPC	Glen Goens	EMA	770-227-8897
Carroll County (W.GA Regional LEPC)	Tim Padgett	EMA-Carroll	770-634-4286
Catoosa County LEPC	Doug Flury	EMA	706-935-2323
Chatham County LEPC	Hugh Futrell	LEPC Chairman	hazmoid@comcast.net
Chattooga County LEPC	Eddie Henderson	EMA	706-857-3400
Cobb County Resource Council, Inc.	Cindy Carroll	LEPC Secretary	770-528-8326
Columbia County LEPC	Pam Tucker	EMA	706-868-3303
DeKalb County LEPC	Sue Loeffler	EMA	770-270-0413
Fayette County LEPC	Donnie Davis	EMA Assistant	ddavis@fayettecountyga.gov
Floyd County LEPC	Tim Herrington	EMA	706-252-4149
Gordon County LEPC	Richard Cooper	EMA	706-602-2905
Greene County LEPC	Byron Lombard	EMA	706-453-7716
Hall County LEPC	David Kimbrell	EMA	770-531-6838
Harolson County (W.GA Regional LEPC)	Tim Padgett	EMA-Carroll	770-634-4286
Heard County (W.GA Regional LEPC)	Tim Padgett	EMA-Carroll	770-634-4286
Henry County LEPC	Jonathon Burnette	LEPC Chairman	770-288-6671
Lamar County LEPC	Becky Martin	EMA Assistant	770-358-5167
Laurens County LEPC	Donald Bryant	EMA	478-277-2911
Macon County LEPC	Judy Hall	Secretary/Treasurer	478-472-8706
Paulding County LEPC	Michael Earwood	EMA	770-222-1160
Sumter County LEPC	Mark Long	LEPC Chairman	229 931 5946
Taylor County LEPC	Vicki Wainwright	City Clerk	478-862-5435
Walton County LEPC	Donnie McCullough	EMA	770-267-1336
West Georgia Regional LEPC (Carroll, Harolson, Heard)	Tim Padgett	EMA-Carroll	770-634-4286
Whitfield LEPC	Amy Cooley	EMA Administrative Assistant	706-876-2517
If you see an error on this sheet or would like something added, please contact Stephen Clark at GEMA 404-635-7233 stephen.clark@gema.ga.gov			
8-Sep-14			

Exhibit 11: GA EPD Contact List

Georgia Environmental Protection Division

Http://epd.georgia.gov/

Land Protection Branch – Floyd Tower Offices

BRANCH CHIEF: Chuck Mueller (404) 463-8509

ASSISTANT BRANCH CHIEF: Sara Visser (404) 232-1346

Office Manager: Kathleen Robinson (404) 657-8688

HAZ. WASTE CORRECTIVE ACTION

Jim Brown, Program Manager (404) 657-8644

- ♦ Remedial Sites Unit 1 (Jim McNamara)
- ♦ Remedial Sites Unit 2 (John Fonk)
- ♦ Remedial Sites Unit 3 (Bruce Khaleghi)
- ♦ Risk Assessment Unit (Shanna Alexander)

- Post-closure permitting, compliance monitoring, and enforcement at closed hazardous waste land disposal facilities
- Review cleanups for privately-owned/operated National Priorities List sites
- Perform risk assessments for both human health and ecological impacts

2 Martin Luther King Jr. Drive
Suite 1054 East
Atlanta, GA 30334-9000
Phone: (404) 656-7802
Fax: (404) 651-9425

RESPONSE & REMEDIATION

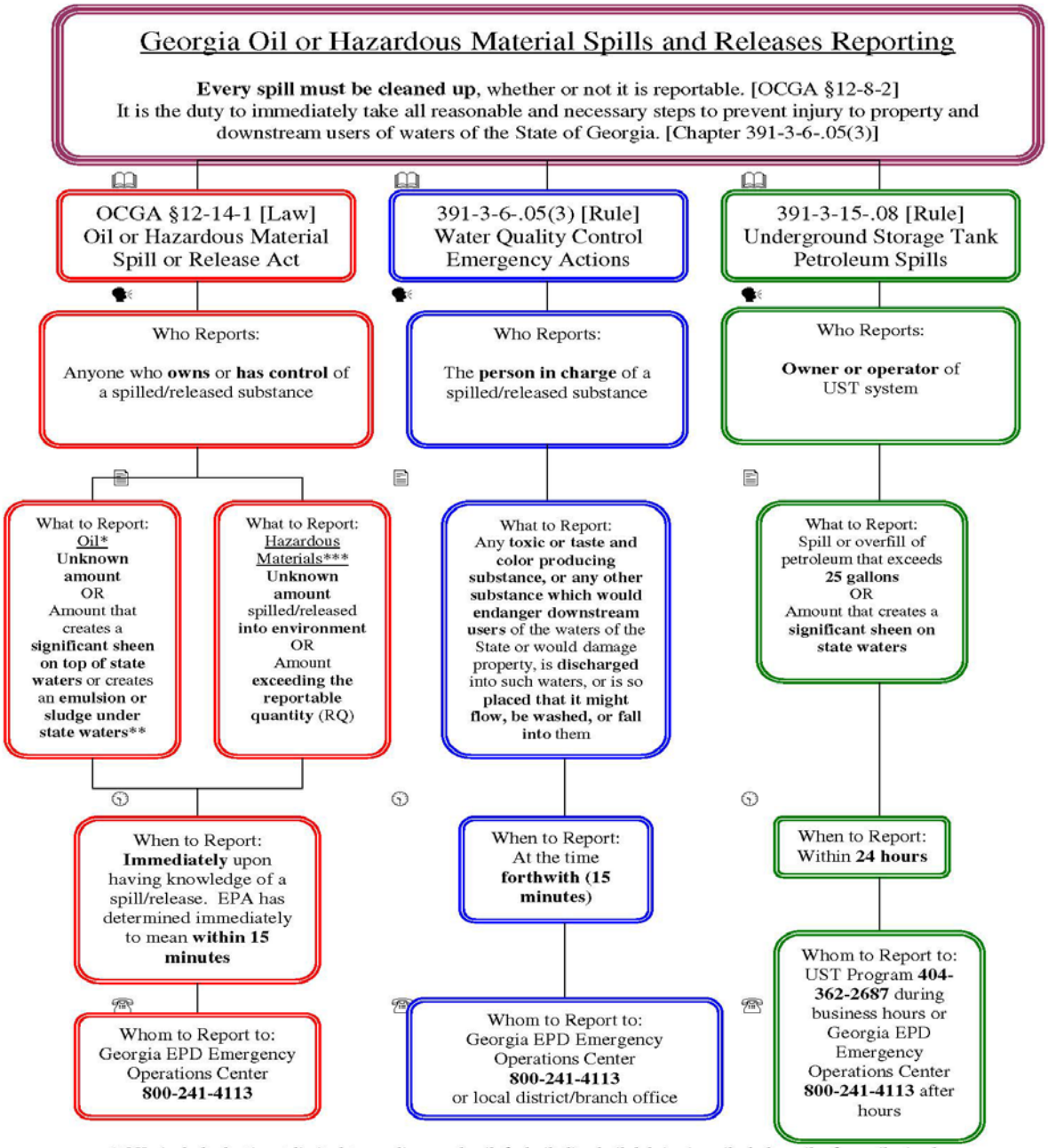
Jason Metzger, Program Manager (404) 657-8606

- ♦ Response Development Unit 1 (David Brownlee)
- ♦ Response Development Unit 2 (Kevin Collins)
- ♦ Response Development Unit 3 (David Hayes) Acting
- ♦ Brownfields Unit (Shannon Ridley) Acting

- Publish the Hazardous Sites Inventory (HSI)
- Take enforcement actions requiring responsible parties to do site investigations and cleanups
- Oversee contaminated sites being investigated and cleaned up by responsible parties
- Require notification for releases of hazardous substances
- Clean up sites using Hazardous Waste Trust Fund when responsible parties are unwilling or unable
- Pursue cost recovery against responsible parties when Hazardous Waste Trust Fund has been used
- Fund state and local government costs associated with investigating and cleaning up solid waste handling facilities
- Conduct preliminary assessments and site evaluations for the federal Superfund program
- Oversees cleanup of contaminated property conducted by private parties under the Georgia Hazardous Site Reuse and Redevelopment ("Brownfields") Act
- Issues limitation of liability certificates for brownfields properties where cleanups have been completed
- Reviews and certifies brownfields cleanup costs eligible for property tax abatement

2 Martin Luther King Jr. Drive
Suite 1054 East
Atlanta, GA 30334-9000
Phone: (404) 657-8600
Fax: (404) 651-9425

Exhibit 12: GA Oil or Hazardous Material Spills and Releases Reporting Matrix



* OIL: includes but is not limited to gasoline, crude oil, fuel oil, diesel oil, lubricating oil, sludge, oil refuse, oil mixed with wastes, and any other petroleum related product.
** EXEMPTION: Accidental discharges of oil made by an individual during maintenance of that individual's personal vehicle or farm machinery shall be exempt.
*** EXEMPTION: A hazardous substance does not include: natural gas, natural gas liquids, liquefied natural gas, synthetic gas usable for fuel, or mixtures of natural gas and such synthetic gas.

This document is intended to provide a brief informational summary of responsibility for spill reporting in accordance with state regulations. It is not intended to be complete legal guidance on the issue. [Revised: February 2010]

Exhibit 13: Contingency Plan Review and Amendment Log

DATE	CHANGES MADE / ANNUAL REVIEW	NAME
07/02/2019	Exhibit 2: Emergency Response Coordinator Contact List – Deleted Mark Harvison's information.	Terri Mason
07/02/2019	Exhibit 4: Emergency Reporting Form – Updated State personnel emails.	Terri Mason
07/02/2019	Exhibit 11: GA EPD Contact List – Updated State personnel and phone numbers.	Terri Mason

Attachment 14

CONTINGENCY PLAN

Federal Law Enforcement Training Centers

Hazardous Waste Contingency Plan

Office of Cheltenham Operations

Federal Law Enforcement Training Centers
Office of Cheltenham Operations
9000 Commo Road STOP 4000
Cheltenham, MD 20588-4000

Office of Cheltenham Operations

Hazardous Waste Contingency Plan

Table of Contents

Page

Federal Law Enforcement Training Centers
HAZARDOUS WASTE CONTINGENCY PLAN
Office of Cheltenham Operations

General Facility Information

The scope of this Contingency Plan for the Federal Law Enforcement training Centers (FLETC) Office of Cheltenham Operations (OCH) includes a 90-Day Hazardous Waste Central Accumulation Site (CAS). The physical address of FLETC Cheltenham (OCH) facility is:

Federal Law Enforcement Training Centers

Office of Cheltenham Operations

9000 Commo Road
Cheltenham, MD 20623-5000
GPS Coordinates (in decimal degrees): 38.7559959, -76.862023

FLETC-OCH began operations in 2001. The property consists of approximately 247 acres with over 61 facilities within the campus. Typical monthly facility population includes: 200 full-time staff; 1525 students; 125 transient contractors; and 1400 visitors. This facility conducts basic and advanced law enforcement training. The site is also used by the Prince George's County Fire Academy for firefighting training. **Figure 1** provides the location of FLETC's OCH facility.

Operations at FLETC's OCH produces a number of hazardous waste products both as a direct result of training activities and as an output from support activities. Training activities occur at multiple locations within the campus and support activities such as vehicle and building maintenance, repair, and fueling operations also produce hazardous waste streams and/or operation susceptible to possible spillage. The wastes generated from these operations include waste which is hazardous due to ignitability, corrosivity, toxicity and/or is a listed hazardous waste.

Hazardous wastes are collected in drums or other appropriate containers that, when full, are placed in the 90-Day Hazardous Waste Central Accumulation Site (CAS). The drum accumulation area is located at Building 53 (**Figure 2**). Most of the waste streams are collected in satellite accumulation areas (SAA) throughout the campus and within the main repair operations area. The Facilities Operations Support Services (FOSS) contractor operates and maintains the 90-Day CAS and the SAAs. FLETC's Cheltenham Facility is considered a large quantity generator; the **EPA Hazardous Waste Generator ID: MDR000503847**.

Site Contact: **Todd A. Braun**
Environmental Protection Specialist (EPS)
9000 Commo Road STOP 4000
Cheltenham, MD 20588-4000
Office Phone: 301-877-8533

Intent and Purpose

This contingency plan is intended as a guide for emergency procedures in the event of fire, explosion, spill or release of hazardous waste. This document is also intended as a reference source to familiarize local emergency response agencies, fire and police departments and area hospitals on operations relating to hazardous materials/wastes and emergency response at FLETC-OCH. This contingency plan has been prepared in accordance with the Resource Conservation and Recovery Act (RCRA) Contingency Planning Requirements in 40 CFR Part 264, Subpart D; 40 CFR Part 265, Subpart D and COMAR Regulation 26.13.05.04.

Internal Emergency Procedures

In the event of an emergency involving hazardous waste or hazardous constituents at FLETC-OCH, the person first identifying the incident will notify security. Security will contact the emergency response coordinator (ERC) listed in **Exhibit 1**. The primary emergency coordinator will be contacted first. If the primary is not available, an alternate ERC should be called in the order listed.

Security can be reached by dialing extension **911** from a FLETC-OCH landline or **301-877-8400** from an off-site telephone or mobile phone. One individual should be assigned to remain a safe distance from, but within view of the emergency, to warn others of the danger until Security and/or Environmental Coordinator arrive.

The emergency coordinators have been selected based on their familiarity with FLETC-OCH, the contingency plan, operation and activities at the facility, the location and characteristics of the wastes handled, the location of records within the facility, and the facility layout. ERCs have a portable cellular phone for notification purposes.

If outside assistance (police, fire, etc.) is needed, ERCs will contact Security to make the necessary phone call(s) and coordinate the arrival(s) to the site. **Exhibit 2**, "Emergency Telephone List," provides telephone numbers for organizations (police, fire, etc.) that may be contacted by the ERC in the event of an emergency. If clear and present danger to either human health or property exists, the ERC will contact the Spill Response Contractor and Security. The ESP will make notifications to NRC and MDE.

Identification of Hazardous Materials

The hazardous waste being stored is hazardous due to ignitability, corrosively, toxicity and/or it is a listed hazardous waste. In the event of a fire/explosion and/or spill, the ERC will identify the following:

- the character of the released material;
- the exact source of the released material;
- the amount of the released material; and
- the extent area of any released materials.

If needed, the ERC will also refer to facility records and employee reports.

Figure 1: Site Location Map

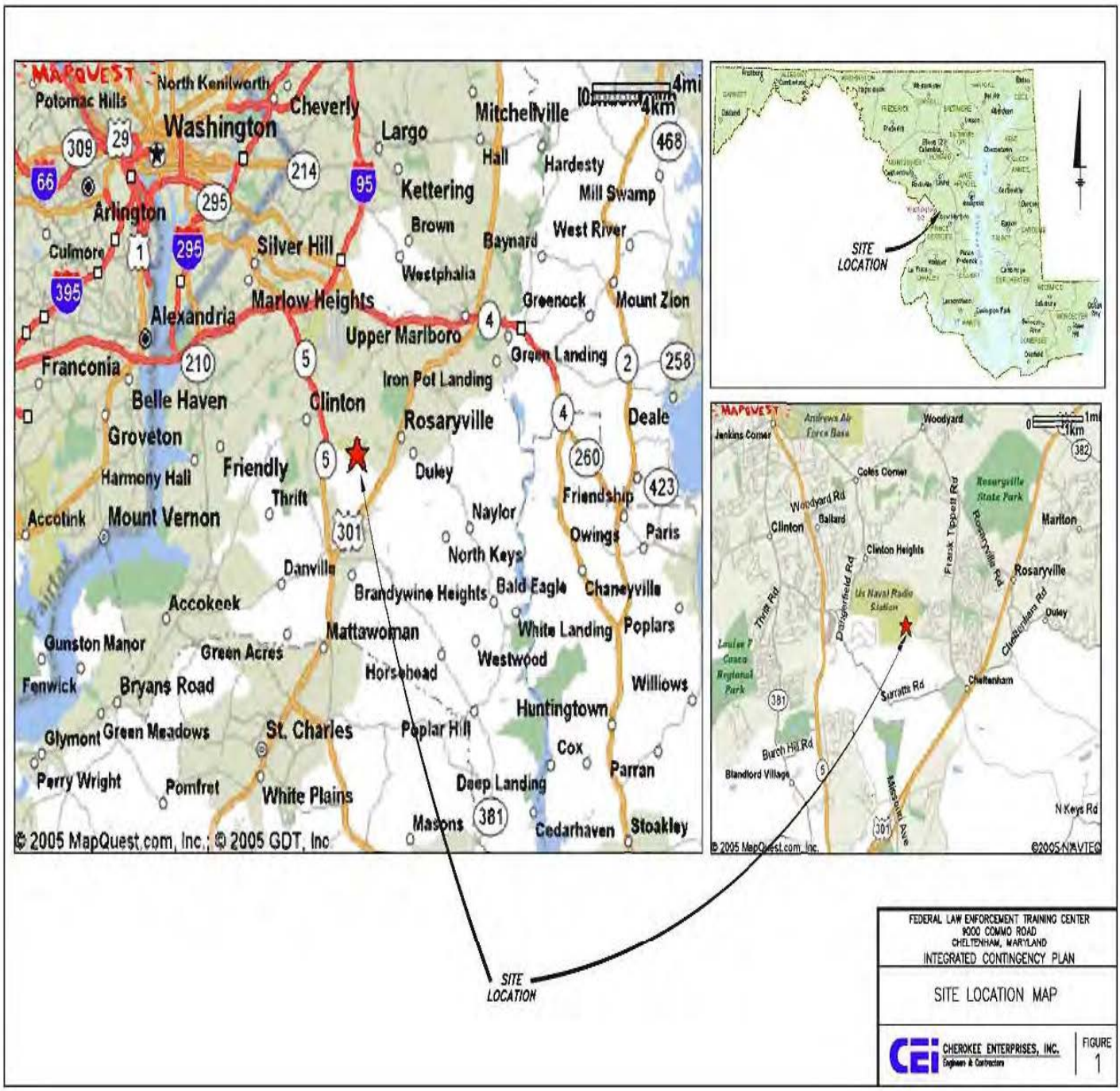


Figure 2: Evacuation Route

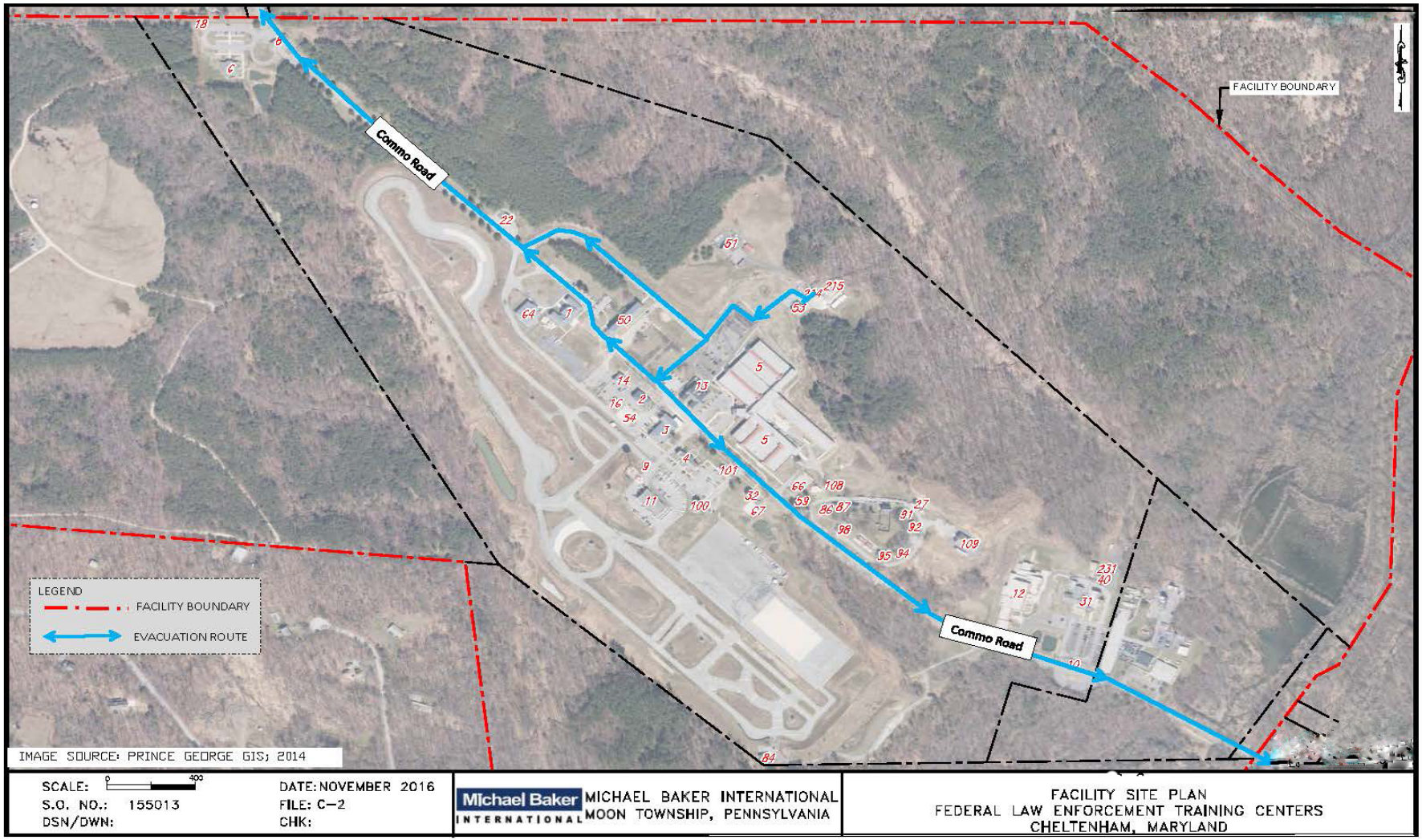
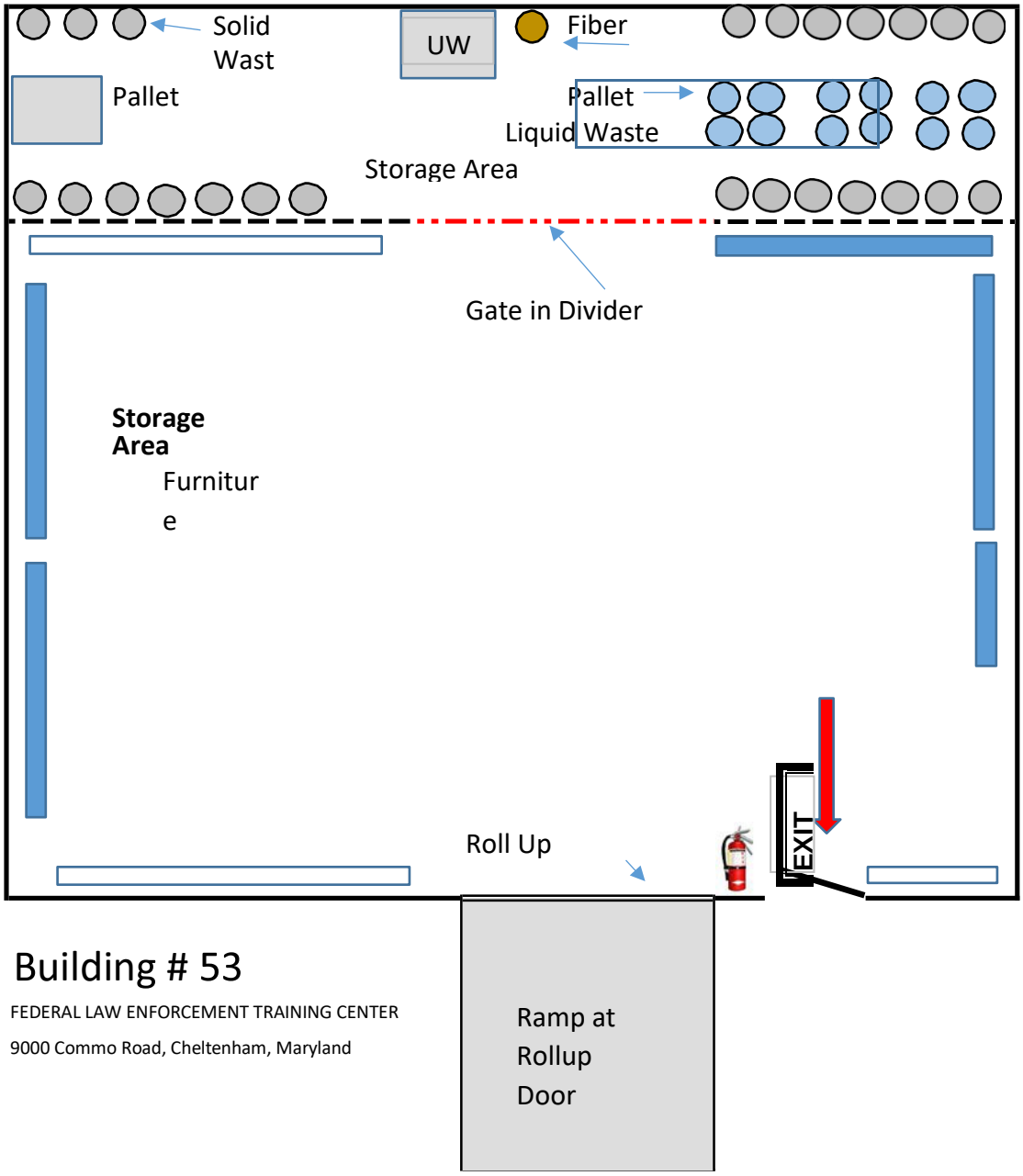


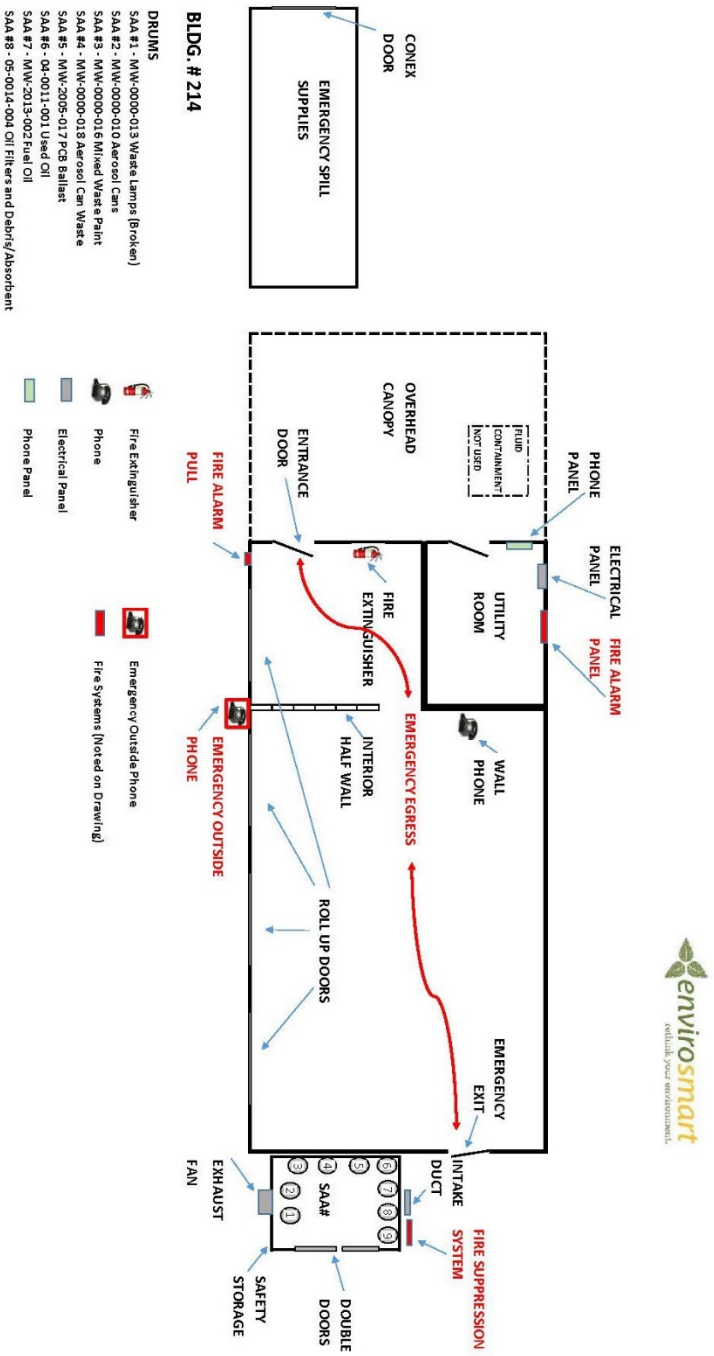
Figure 3A: 90-Day Hazardous Waste Central Accumulation Site



LEGEND

- Liquid Waste - typically no more than 12 drums
- Solid Waste - typically no more than 35 drums
- UW - Universal Waste - typically on pallet
- Fiber Drum (Bulbs)
- Fire Extinguisher
- Metal Storage Racks
- Gate in Divider Fence

Figure 3B: 90-Day Hazardous Waste Central Accumulation Flammable Site



Control Procedures

This contingency plan will be implemented in the event of a spill of hazardous waste, fire, any explosion, or a combination of these. Additionally, the contingency plan will be implemented if the Emergency Response Coordinator determines that a threat to human health or the environment exists. Implementation of this contingency plan is intended to mitigate or protect the facility and neighboring community from injury; contamination of storm sewers with hazardous materials; damage to equipment; damage to the environment; or a combination of these. This section of the contingency plan addresses control procedures relative to hazardous waste emergency episodes within the 90-Day CAS.

90-Day Hazardous Waste Central Accumulation Site (CAS)

The 90-Day CAS is located within a separate and secure area of Building 53. This area consists of a concrete pad, which has been sealed with a chemically resistant sealer per the manufacturer's specifications. Due to the accumulation of ignitable hazardous waste, the area is located greater than 50 feet from the property line. **Figure 3A, Figure 3B and Exhibit 13** shows the location and layout of the 90-Day CAS within the footprint of Building 53 and Building 214.

Typical wastes stored at the 90-Day CAS typically include: 35 55-gallon drums of lead-contaminated solid wastes (crushed air filters, floor sweepings, trash, etc.); 12 55-gallon drums of liquid waste (wastewater); one pallet of wet and gel cell lead-acid batteries; and 75 spent fluorescent lamps in a fiberboard box. Drums of each waste stream are placed in aisles in the accumulation area. Appropriate aisle space is maintained between the pallets.

A separate pre-fabricated steel container (i.e. Conex) located just south of the Building 214, is used as an SAA for flammable liquids, aerosol cans and associated wastes, used oil, spent fuel oil, oil filters, paint wastes, universal waste lamps and PCB ballasts. This container has its own secondary containment, fire alarm, and suppression systems and uses an explosion-proof electrical system. These wastes are picked up directly from this SAA by the waste disposal contractor and not stored in the 90-Day CAS.

Located adjacent to the concrete equipment pad at Building 214 is another pre-fabricated steel container used for the storage of spill response equipment such as absorbents, oil booms and socks, and other cleanup equipment and supplies. Some personal protective equipment, such as that used to handle lead-contaminated debris, is stored in Building 5. The FOSS contractor maintains and supplies the spill response equipment.

During an emergency, the ERC must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other hazardous material/waste at the facility. These measures must include, where applicable:

A. Stopping processes and operations;

B. Collecting and containing released waste;

C. Removing and isolating applicable containers.

The ERC must evaluate the facility's emergency equipment to determine if FLETC personnel can handle the corrective action in the event of a fire/explosion and clean-up efforts in the event of a spill. A list of the emergency equipment is found under **Exhibit 6**.

Control Procedures: Fire/Explosion

The following actions will be taken in the event of a fire or explosion:

A. The facility emergency alarm is sounded by telephone or internal communication to security at **911 / 301-877-8400**. Work in all areas will be shut down until the area is safely restored.

B. The ERC will be contacted (see **Exhibit 1**).

C. If the employee has had the appropriate training, the employee may use nearby firefighting equipment to provide early containment of a fire to significantly reduce the total damage. HOWEVER, FIRE FIGHTING ACTIVITIES THAT MAY CAUSE INJURY TO THE PERSONS INVOLVED SHOULD NOT BE PERFORMED.

D. If FLETC personnel cannot safely and effectively perform corrective action and/or has not had the appropriate response training in the event of a fire and/or explosion, the ERC must:

1. Assess possible hazards to human health and the environment that may result from the fire and/or explosion. This includes:

a. Person(s) injured and seriousness of injury.

b. Location of any spill or leak, material involved, and source.

c. Type of material that has spilled, is leaking and/or is involved in the fire/explosion.

d. The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.

e. Any possible airborne constituents associated in smoke plume.

2. Contact security at **9 1 1 / 301-877-8400** who in turn will contact the local fire department. Contact other emergency response organizations as listed under **Exhibit 2**.

3. Operating equipment will be shut down as necessary and practical.

4. If the emergency response coordinator determines that an area or site evacuation is required, the security force must be notified to sound the proper alarm.

5. All injured persons will be removed and medical treatment will be administered by trained personnel.

6. If FLETC personnel can safely and effectively perform corrective action and clean-up, the following steps are to be taken under the authorization of the ERC (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):

a. Eliminate all possible sources of ignition.

b. Clean up the released/affected media from the fire or explosion per the spill control procedures listed.

7. For fires, explosions, and releases to the environment, the ERC must make the necessary reports as outlined in **Exhibits 3, 4, and 5.** FLETC's Glynco Environmental & Safety Division (ESD) shall be notified of all fires/explosions**.**

Control Procedures: Spills

The following actions will be taken in response to a spill of hazardous material:

A. The facility emergency alarm is sounded via call to onsite security by cell phone, telephone at **911 /**

301-877-8400, internal communication, and/or alarm pull box if located in area. Notification is required to the Environmental Protection Specialist. Work in all areas will be shut down until the area is safely restored.

B. The ERC will be contacted. Based on the description of spill, the ERC will judge if the spill is large enough to call the Spill Response Contractor. If it is determined that their services are needed, the contractor shall be called immediately with a description of the material, and the amount discharged.

C. The ERC must immediately identify the character, exact source, and extent of any released materials. This information must be obtained without entering the contaminated area. The Emergency Response Coordinator will obtain the following information:

1. Person(s) injured and seriousness of injury.

2. Location of the spill or leak, material involved, and source.

3. Type of material that has spilled or is leaking.

4. The approximate amount of material spilled, an estimate of the liquid discharge rate and the direction of the liquid flow.

D. Emergency response employees will only respond to chemical incidents where proper chemical identification and concentrations can be determined.

E. For small spills: If FLETC personnel can safely and effectively perform corrective action and clean up, the following steps are to be taken under the authorization of the emergency coordinator (ONLY AFTER THE RESPONSE PERSONNEL PUT ON THE APPROPRIATE PROTECTIVE CLOTHING):

1. Immediately begin containment by placing absorbent material on/around the spill within the secondary containment

2. Immediately set up a barrier to alert unauthorized personnel to keep out, if evacuation has not occurred.

3. Eliminate all possible sources of ignition and leakage.

4. Set up decontamination zone to ensure proper decontamination procedures (if applicable).

5. Use shovels and/or heavy equipment available at the facility to place contaminated absorbent into open top DOT approved drums.

6. Any drummed cleanup materials are to be managed as hazardous waste until proper analysis has shown otherwise.

7. Drums of cleanup material are to be properly labeled.

8. Assigned personnel are to continue to cleanup and remove all residue until all contamination hazards are eliminated.

F. For large spills: If FLETC personnel cannot safely and effectively perform corrective action in the event of a spill, the ERC must:

1. Assess possible hazards to human health and the environment that may result from the spill.

2. Contact security at **911 / 301-877-8400** who in turn will contact the local fire department. Contact other emergency response organizations as listed under **Exhibit 2**.

G. For small or large spills, the ERC must make the necessary reports as outlined in **Exhibits 3, 4 and 5**. Note under RCRA, CERCLA and SARA, a report is required if the release leaves FLETC or exceeds the

Reportable Quantity for that substance. If a formal report is made to the State and/or NRC, EPS shall notify FLETC's Glynco ESD.

H. After cleanup has occurred, the ERC must ensure that, in the affected area of the facility:

1. No waste may be incompatible with the released material stored.

2. All emergency equipment listed in the emergency response contingency plan is cleaned and fit for its intended use before resuming operations.

3. All disposable equipment used during the incident is replaced with new equipment in the appropriate area.

Post-Emergency Equipment Maintenance

Immediately after an emergency event requiring the implementation of the contingency plan, all emergency equipment utilized will be inspected for proper function, completeness and condition. The equipment used for spill clean-up will be documented on the emergency report form (**see Exhibit 5**). The equipment will be evaluated for hazardous characteristics, decontaminated, or properly disposed of in containers. Decontamination procedures include a pressurized water rinse, scrubbing equipment with brushes and water-compatible solvent cleaning solutions or steam cleaning. If the equipment remains contaminated, additional decontamination efforts will be completed. Contamination will be determined through visual observation and sampling, if necessary (**see Exhibit 5**).

Rinsates from equipment decontamination will be collected in containers. The rinsates which contacted hazardous waste and resulting residue will be managed as hazardous waste unless laboratory results indicate otherwise. Other rinsates will be managed in accordance with all applicable laws.

Processes which generate hazardous wastes that were affected must not be resumed until the equipment has been properly decontaminated and has been checked for proper operation. All emergency spill equipment will be replenished accordingly.

Coordination Agreements

The contingency plan promotes routine contact with the area police and fire departments and hospitals. **Exhibit 7** provides a list of contacts for the contingency plan distribution. **Exhibit 8** provides a sample distribution letter that accompanies the Contingency Plan distribution.

The Prince George's Fire Department is the responding authority in the event of a fire at FLETC-OCH. The fire department has full authority as soon as they arrive at the site. FLETC-OCH utilizes Southern Maryland Medical Center whenever medical emergencies occur.

FLETC-OCH has submitted under SARA Title III, emergency and hazardous chemical inventory forms to the local, county and state agencies.

The Office of Security and Professional Responsibility (OSPR) is the responding authority should their services be needed at FLETC-OCH. In addition, the Prince George's County Police Department may respond to emergencies at FLETC-OCH.

Contingency Plan Revisions/Amendments

This plan must be reviewed and immediately amended, if necessary, whenever any of the following events occur. These reviews and changes shall be documented in **Exhibit 12**.

Applicable rules are changed;

1. Plan fails in an emergency;

2. Facility changes in DESIGN, CONSTRUCTION, OPERATION, MAINTENANCE PRACTICES or OTHER CIRCUMSTANCES in a way that increases the potential for fires, explosions or releases of hazardous wastes or hazardous constituents or changes the response necessary in an emergency;

3. Emergency coordinator list changes; or

4. Emergency equipment list changes.

Training

Training shall be provided as applicable to employees meeting the duties or responsibilities as outlined in **Exhibit 9** of this plan.

List of Acronyms and Abbreviations

CAS Central Accumulation Site

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CFR Code of Federal Regulations

DOT Department of Transportation

EPS Environmental Protection Specialist

ERC Emergency Response Coordinator

ESD Environmental and Safety Division

FLETC Federal Law Enforcement Training Centers

FOSS Facilities Operations Support Services

HW Hazardous Waste

LEPC Local Emergency Planning Committee

MDE Maryland Department of the Environment

OCH Office of Cheltenham Operations

OSHA Occupational Safety and Health Administration

OSPR Office of Security and Professional Responsibility

RCRA Resource Conservation and Recovery Act

SAA Satellite Accumulation Area

SARA Superfund Amendments and Reauthorization Act

Exhibit 1: Emergency Response Coordinator Contact List

	NAME	TITLE	LOCATION	TELEPHONE NUMBERS	
				Business	Mobile
1.	Todd Braun	Environmental Protection Specialist	Cheltenham	301-877-8533	301-653-6568
2.	Lance Kennedy	Lead Field Site Security Officer	Cheltenham	301-877-8534	912-230-0668
3.	Phillip Frederick	Field Site Security Officer	Cheltenham	301-877-8440	912-580-6181
4.	James Tabb	Chief, Administrative Division	Cheltenham	301-877-8337	240-304-4968
5.	Mark Shaner	Facilities Project Manager	Cheltenham	301-877-8504	301-904-8611

Exhibit 2: Emergency Telephone List

Note: Four digit numbers are for on-center phones
If FLETC Security is notified, they will call other responders as needed

Police Department

FLETC-OCH Security	911 / 301-877-8400
Prince George's County Police	911 / 301-749-4900

Fire Department

Prince George's County Fire Department	911 / 301-499-8496

Hospitals

Southern Maryland Hospital Center	301-868-8000

Other Emergency Services

Ambulance Service	911 / 301-499-8496
Potomac Electric Power Company (PEPCO)	877-737-2662

Regulatory Agencies

Washington Suburban Sanitary Commission (WSSC) (Water and sewer service provider main line)	301-206-9772
WSSC Emergency Call Center	301-206-4002
Maryland Department of the Environment (MDE) Emergency Response Team 24-hour Spill Reporting and Response	866-633-4686
MDE Daytime Oil Control phone	410-537-3975
MDE HAZMAT Spill Fax	410-537-3092
National Response Center (NRC) USCG/USEPA 24-hour Spill Reporting	800-424-8802

Utility Companies

Washington Suburban Sanitary Commission (WSSC)	301-206-7342

FLETC Spill Response Contractor: LG2 (Contract #: W912HN-16-P-0064)

Business:	904-288-8631
24-hours:	904-610-1184

Exhibit 3: General Spill Reporting Guidelines

AGENCY / SITUATION	WSSC	MDE	NRC
Any quantity of petroleum, oil, or lubricants (POL) within secondary containment or a building that does not enter the environment	No	No	No
Less than 5 gallons of POL in the environment (not inside a building or secondary containment) onto concrete, or asphalt that is cleaned up immediately	No	Information must be collected and given to OCH EPS for inclusion in Monthly Small Spill Report	No
Greater than 5 gallons of POL onto any surface but not into a waterway (storm drain, stream, lake)	No	Yes, telephone within 2 hours, fax report of spill form within next business day	No
Any quantity of POL into a waterway (storm drain, stream, lake) or sanitary sewer system	Yes - only if spill entered sanitary sewer system. Telephone within 2 hours, follow-up telephone within next business day and written letter within 5 days.	Yes, for storm drains, streams or outflows. Telephone within 2 hours, fax report of spill form within next business day	Yes, telephone within 2 hours
Any quantity of toxic or hazardous materials or hazardous waste released to the environment (not inside a building or inside secondary containment)	Yes, telephone within 2 hours, follow-up telephone within next business day and written letter within 5 days (only if spill entered sanitary sewer system)	Yes, telephone within 2 hours, fax report of spill form within next business day and written letter within 5 days	Yes, telephone within 2 hours

Exhibit 4: Emergency Reporting Form

MARYLAND DEPARTMENT of the ENVIRONMENT
1800 WASHINGTON BOULEVARD
BALTIMORE, MARYLAND 21230
(410) 537-3000
1-800-633-6101 (within Maryland)
http://www.mde.state.md.us

State of Maryland
Department of the Environment
Emergency Response Division
1800 Washington Blvd. Suite #105
Baltimore , Maryland. 21230-1721

24 HOUR SPILL REPORTING
(Toll Free) 1-866-633-4686
EMERGENCY RESPONSE OFFICE
(410) 537-3975
RESPONSE OFFICE FACSIMILE
(410) 537-3932

PURSUANT TO THE PROVISIONS OF STATE LAW AND REGULATION; (COMAR 26.10.01.03) "A PERSON DISCHARGING OR PERMITTING THE DISCHARGE OF OIL, OR WHO EITHER ACTIVELY OR PASSIVELY PARTICIPATES IN THE DISCHARGE OR SPILLING OF OIL, EITHER FROM A LAND BASED INSTALLATION, INCLUDING VEHICLES IN TRANSIT, OR FROM ANY VESSEL SHIP OR BOAT OF ANY KIND, SHALL REPORT THE INCIDENT IMMEDIATELY TO THE ADMINISTRATION." "THE REPORT OF AN OIL SPILL OR DISCHARGE SHALL BE MADE TO THE ADMINISTRATION IMMEDIATELY, BUT NOT LATER THAN TWO HOURS AFTER DETECTION OF THE SPILL." *** *FIRE DEPARTMENT PERSONNEL , SEE REVERSE* ***

ADC Map Coord _____

Date of spill: Mo. __ __ / Day __ __ / Yr. 20 __ __ Time of spill: __ __ __ __ Hours (24 hour clock)

Fire Department Report No.: _____ Police Department Report No.: _____

Location of spill - Street address:
_____
_____
City / Town _____
MD County _____
Zip _____

Product Name:
_____
(Indicate Gasoline, Diesel, Heating Oil, Chemical Name or UN ID etc.)
Container Type:
_____
(Indicate AST, UST, Transformer, Saddle Tank, Drum etc.)

Capacity of Vessel, Vehicle or Tank:
_____ Gallons
Amount ***IN*** Vessel, Vehicle or Tank:
_____ Gallons
Estimated ***Amount Spilled:***
_____ Gallons

Transportation Incident:
_____
(Indicate Type of Auto, Truck, Train, Aircraft or Watercraft etc.)
Fixed Facility Incident:
_____
(Indicate Type of Industrial, Commercial, Residential etc.)

☐ Contained on Land
☐ Entered Storm Drain or Ditch
☐ Entered Sanitary Sewer
☐ Is Below Ground
☐ Entered surface waters: _____ (Waterway Name)

Vehicle Tag Number and State:
_____ _____
DOT or ICC MC Number:
_____
Hull Numbers and Name:
_____ _____

Person(s) Responsible for Spill: (Driver if Vehicle)
Name: _____
Address: _____
_____
City/State: _____ Zip: _____
Phone: _____
Drivers Lic.No. _____ State: _____

Be Sure to Complete Both Sections ⇔ *Don't Forget to Sign Below*

Company Responsible for Spill: (N/A if private citizen.)
Name: _____
Address: _____
_____
City/State: _____ Zip: _____
Phone: _____
Fed. Employer ID No. _____

Cause of Spill:
☐ Motor Vehicle Accident
☐ Personnel Error/Vandalism
☐ Tank/Container/Pipe Leak
☐ Mechanical Failure
☐ Transfer Accident
☐ _____

Identify All Groups that *Participated* in Spill Mitigation : ☐ Responsible Party
☐ **MDE ERD #** _____ # _____
☐ Federal : _____
☐ State : _____
☐ Local : _____
☐ Contractor: _____

Materials used *by You* to contain/clean-up spill:
Sorbent Dust: _____ Bags
Sorbent Pads: _____ each or bales
Sorbent Booms: _____ each or bales
Sorbent Sweeps: _____ each or bales
Overpack Drums : _____ ea. Steel or Poly
Other: _____

Responsible Party : Describe circumstances contributing to the spill. (Additional space on back) [Optional for FD or Govt Personnel]

Responsible Party : Describe Containment , Removal and Clean-up operations , including disposal. (Additional space on back) [Optional for FD or Govt Personnel]

Responsible Party : Procedures, Methods and Precautions instituted to prevent recurrance of the spill. (Additional space on back) [Optional for FD or Govt Personnel]

THE UNDERSIGNED CERTIFIES THAT THE INFORMATION PROVIDED IS TRUE AND CORRECT TO THE BEST OF HIS OR HER KNOWLEDGE AT THE TIME THE REPORT WAS COMPLETED.

Print Name: _____ **Company or Fire Department:** _____
Address : _____ **City / State / Zip** _____
Telephone _____ **Signature** _____

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MARYLAND DEPARTMENT of the ENVIRONMENT
1800 WASHINGTON BOULEVARD
BALTIMORE, MARYLAND 21230
(410) 537-3000
1-800-633-6101 (within Maryland)
http://www.mde.state.md.us

State of Maryland
Department of the Environment
Emergency Response Division
1800 Washington Blvd. Suite #105
Baltimore , Maryland. 21230-1721

24 HOUR SPILL REPORTING
(Toll Free)1-866-633-4686
EMERGENCY RESPONSE OFFICE
(410) 537-3975
RESPONSE OFFICE FACSIMILE
(410) 537-3982

PURSUANT TO THE PROVISIONS OF STATE LAW AND REGULATION; (Environmental Article 4-401 (i) ; the "Person Responsible for the discharge includes , The owner of the discharged oil , The owner , operator and / or the person in charge of the oil storage facility, vessel , barge , or vehicle involved at the time of or immediately before the discharge ; and Any person who through act or ommission , causes the discharge ."

******Fire Department *** and Local or State Government Agencies : Unless you are the responsible party as defined above , Please indicate " Unknown " in any box requesting information that is unknown or unavailable to you at the time of report.***

This Space for continuation and additional information.

THE UNDERSIGNED CERTIFIES THAT THE INFORMATION PROVIDED IS TRUE AND CORRECT TO THE BEST OF HIS OR HER KNOWLEDGE AT THE TIME THE REPORT WAS COMPLETED.

Print Name: _____ **Company or Fire Department:** _____

Address : _____ **City / State / Zip** _____

Telephone _____ **Signature** _____

Exhibit 5: Emergency Incident Reporting Form

Emergency Report Incident No. ____

1. Type of emergency: Fire_____, Spill_____, Other _____
2. Alarm: Date_____, Time_____, Shift _____
3. Alarm sounded: □ Yes □ No, By _____
4. Location of emergency _____
5. Description of emergency and property involved _____

_____

6. Materials involved and their hazards _____

_____

7. Cause of emergency _____

_____

8. If fire, source of ignition _____
9. Narrative account of fire/spill control measures _____

_____

10. Extinguishing agents used (itemize) _____
11. List other equipment used _____

_____

12. All clear announced by _____
13. Alarm station reset _____
14. Emergency equipment restored to operating condition _____
15. Recommendations and remarks _____

_____

16. Report Submitted By_____ Title _____

Exhibit 6: Emergency Equipment List

These lists are representative of the types and quantities of equipment and supplies that may be available to site personnel and emergency responders in case of an incident. However, these lists are not meant to be all-inclusive, in that the types and quantities of equipment and supplies may vary over time and circumstance.

LOCATION	ITEM	QTY	UI	CT	CAPABILITIES
Incident Response Equipment and Supplies					
214 CONEX	Absorbent mat pads, gray, 15” x 20”	4	BX	100	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Absorbent pad, gray, 15” x 150-ft	7.5	RO	NA	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Absorbent socks, gray, 3” dia, various lengths	12	EA	NA	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Absorbent mat pads, brown, 15” x 20”	2	BX	100	Used to absorb oil only
214 CONEX	Absorbent mat pads, white, 15” x 20”	1	PG	100	Used to absorb fuels and solvents; dissipates static electricity
214 CONEX	Absorbent mat pads, blue, 15” x 19”	1	BX	100	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Absorbent booms, white, 3” x 3 meters, 2-gallon capacity	2	BG	8	Used to absorb oil only
214 CONEX	Absorbent booms, gray, 3” x 42”, 64-oz capacity	2.5	BG	NA	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Absorbent, oil, granular	7	BX	40	Used to absorb oils, fuels, solvents
214 CONEX	Absorbent pillows, pink, hazardous chemical, 1-gallon capacity	2	BX	10	Used to absorb acids, bases, and unknown liquids
214 CONEX	Absorbent pillows, gray, liquid, 1-gallon capacity	2	EA	NA	Used to absorb liquids containing oils, coolants, solvents and water
214 CONEX	Baking soda, powdered	1	BX	5 lbs.	Used to neutralize acids, bases, and unknown liquids
214 CONEX	Putty, drum repair	1	JR	32 oz	Used to plug small holes and leaks in metal or plastic containers
214 CONEX	Sand, granular, loose, bulk	10-20	TN		Used to cover or contain liquid spills or runoff or extinguish fires
214 CONEX	Sandbags, empty	100	EA	NA	Filled with sand and then used to contain liquid spills or runoff
214 CONEX	Sandbags, pre-filled	12	EA	NA	Used to contain liquid spills or runoff
Bldg. 53	Absorbent, oil, granular	4	BX	40	Used to absorb oils, fuels, solvents
Bldg. 53	Alarm, pull-box	1	EA	NA	Used to alert emergency services personnel of incident; connected to central alarm communication system
Bldg. 53	Extinguisher, fire, dry chemical	2	EA	10-lb	Used to extinguish Class A, B, or C fires; one located inside front door and other on east side of building
Bldg. 53	Telephone, landline	1	EA		Used to communicate with emergency response personnel; located on desk outside fenced area

LOCATION	ITEM	QTY	UI	CT	CAPABILITIES
Spill Cleanup Equipment and Supplies					
214 CONEX	Shovel, scoop, metal	1	EA	NA	Used for spill cleanup
214 CONEX	Shovel, scoop, plastic	1	EA	NA	Non-sparking shovel used for spill clean-up
214 CONEX	Shovel, flat, metal	1	EA	NA	Used for spill cleanup
214 CONEX	Shovel flat, plastic	1	EA	NA	Non-Sparking shovel used for spill clean-up
214 CONEX	Broom, push	2	EA	NA	Used for dry spill cleanup
214 CONEX	Broom, straw	1	EA	NA	Used for dry spill cleanup
214 CONEX	Pan, dust	1	EA	NA	Used for dry spill cleanup
214 CONEX	Drum, steel, open-top 30-gallon	1	EA	NA	Used to collect dry spill cleanup material and waste
214 CONEX	Drums, steel, open-top 55-gallon	1	EA	NA	Used to collect dry spill cleanup material and waste
214 CONEX	Drum, salvage, poly, 95-gallon	3	EA	NA	Used to over-pack damaged or leaking containers
214 CONEX	Funnel, drum top, 55-gallon	2	EA	NA	Used to safely transfer liquids into drums, sits on top of open top 55-gallon drums
214 CONEX	Funnel, drum top, 30-gallon	4	EA	NA	Used to safely transfer liquids into drums, sits on top of open top 30-gallon drums
214 CONEX	Funnel, liquid		EA	NA	Used to safely transfer liquids into open top drums
Bldg. 53	Drum, fiberboard, 55-gallon		EA	NA	Used to collect dry spill cleanup material and waste
Bldg. 53	Bucket, with lid, plastic, 5-gallon	4	EA	NA	Used for spill cleanup
Bldg. 53	Box, cardboard, cubic yard	10	EA	NA	Used to collect dry material and waste
Bldg. 53	Liner, drum, poly, 55-gallon, 6-mil	8	EA	NA	Used to protect steel drums from aggressive fluids
Bldg. 53	Liner, box, poly, cubic yard, 6-mil	3	EA	NA	Used to contain dusts within cubic yard cardboard boxes
Bldg. 53	Sampler, drum tube, plastic	10	EA	NA	Used to sample liquids from drums
Bldg. 53	Pallet, containment, poly	19	EA	NA	Used for spill and leak containment from drums containing liquids
Bldg. 53	Labels, various	NA	EA	NA	Used to identify contents and disposition of spill cleanup containers
Bldg. 54	Drum, steel. open top, 30-gallon	15	EA	NA	Used to collect dry spill cleanup material and waste
Bldg. 54	Drum, steel. open top, 55-gallon	25	EA	NA	Used to collect dry spill cleanup material and waste
Bldg. 54	Drum, steel. closed top, 55-gallon	50	EA	NA	Used to collect liquid spill cleanup material and waste

LOCATION	ITEM	QTY	UI	CT	CAPABILITIES
Personal Protective Equipment (PPE)					
Bldg. 53	Eye wash, station	2	EA	NA	Used to wash the eyes in the event chemical exposure to spill response personnel
214 CONEX	Gloves, latex, blue	1	BG	20	Used to protect hands from dry compounds, such as exposure to inorganic lead and lead-contaminated wastes; provides limited chemical exposure protection
214 CONEX	Gloves, neoprene, black	3	PR	NA	Used to protect hands from injury during spill clean-up of acids, bases, and other aggressive liquids; Provides limited chemical exposure protection
214 CONEX	Apron, nitrile, green	6	EA	6	Used to protect the body from and limit spread of contamination during cleanup of spilled liquids; provides limited chemical exposure protection.
Bldg. 5 WASDA	Goggles, eye, splash-proof	12	EA	NA	Used to protect the eyes from injury during spill clean-up of acids, bases and unknown liquids; provides limited chemical exposure protection.
Bldg. 5 WASDA	Gloves, nitrile, green	250	PR	NA	Used to protect hands from injury during spill clean-up of oils, coolants, solvents, and water; Provides limited chemical exposure protection
Bldg. 5 WASDA	Coveralls, Tyvek	50	EA	NA	Used to protect the body from and limit spread of contamination during cleanup of spilled dry chemical compounds, such as lead-contaminated wastes; provides limited chemical exposure protection.
Bldg. 5 WASDA	Boot covers, Tyvek	50	PR	NA	Used to protect the feet from and limit spread of contamination during cleanup of spilled dry chemical compounds, such as lead-contaminated wastes; provides limited chemical exposure protection.
Bldg. 5 WASDA	Respirator, half mask	8	EA	NA	Used as respiratory protection during light duty spill cleanup
Bldg. 5 WASDA	Respirator, full mask	8	EA	NA	Used as respiratory protection during medium duty spill cleanup where is there is risk of contamination to eyes, nose, and face
Bldg. 5 WASDA	Respirator, PAPR	4	EA	NA	Used as respiratory protection during heavy duty spill cleanup where is there is risk of contamination to eyes, nose, and face and a higher protection factor is required
Bldg. 5 WASDA	Filters, air, cartridge, HEPA	20	EA	NA	Used with respirators to remove airborne contaminants during spill cleanup

Exhibit 7: Emergency Response Contingency Plan Distribution List

Emergency Response Contingency Plan Distribution

- On-site Personnel
- Local Fire Department
- Office of Security and Professional Responsibility (OSPR)
- Local Health Unit
- MDE, Emergency Response
- Local Sewer District
- Prince George's County Local Emergency Planning committee (LEPC) on Exhibit 10
- MDE Contact list on Exhibit 11

Exhibit 8: Sample Distribution Letter

(Use current FLETC-OCH letterhead)

(Addressee Name) (*INSERT DATE)*
(Addressee Title)
(Program)
(Agency)
(Street Address)
(City, State, Zip Code)

Dear *(Addresses)*,

The Federal Law Enforcement Training Centers (FLETC) is a component of the Department of Homeland Security (DHS) that provides law enforcement training for many federal, state, tribal, and local agencies. The FLETC Office of Cheltenham Operations (OCH) performs such training operations at its facilities located in Cheltenham, Maryland. As part of these operations, FLETC-OCH generates and manages hazardous wastes (HW). FLETC-OCH requests your agreement to respond to HW emergencies at its facilities, as is appropriate for your function, upon request by FLETC-OCH personnel.

Enclosed for your information is a copy of FLETC-OCH's HW Contingency Plan which can be used to familiarize your emergency response personnel with the layout of FLETC-OCH, properties of hazardous wastes handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes.

Please respond to this request in writing. A self-addressed stamped envelope is also enclosed for your use.

Please contact me if you have any questions or require additional information regarding this request. You may reach me by phone at 301-877-8533 or e-mail at todd.a.braun@fletc.dhs.gov.

TODD A. BRAUN
Environmental Protection Specialist
Office of Cheltenham Operations

Enclosure
FLECT-OCH HW Contingency Plan

Exhibit 9: Training Requirements

RCRA Training Requirement	OSHA Training Requirement	Comment
264.16(a)(1) Basic Requirement--Personnel must successfully complete a program of instruction or training which meets certain minimum requirements	1910.120 (p)(7)(I) Basic Requirement--Personnel who are exposed to health hazards or hazardous substances at TSD operations must successfully complete a 24 hr. initial training program which will enable the employees to safely perform their assigned duties.	OSHA requirement meets or exceeds RCRA. Note that non-exposed employees do not require OSHA 1910.120 training.
264.16(a)(1) Setting for instruction--Program must consist of classroom instruction or on-the -job training.	1910.120 *App. E - Training Curriculum Guidelines - (Non-mandatory)* suggests that training should be conducted in a facility that has sufficient resources, equipment, and site locations to perform didactic and hands-on training when appropriate. OSHA does not address using on-the-job training to meet the requirements of initial training except at 1910.120 (p)(7)(ii) which allows employers who can show by an employee's previous work experience or training that the employee has had training equivalent to the initial training.	OSHA requirement may be more restrictive than RCRA which allows on-the-job training.
264.16(a)(2) Training director--The program must be directed by a person trained in hazardous waste management procedures.	1910.120(p)(7)(iii) Trainers must have completed a training course for teaching the subjects they are expected to teach or they must have the academic credentials and instruction experience necessary to demonstrate a good command of the subject matter and competent instructional skills.	OSHA requirement meets or exceeds RCRA.
264.16(a)(3) Program Design--The training program must be designed to ensure at a minimum that facility personnel are able to respond effectively to emergencies.	1910.120(p) (7) (I) Training should enable employees to perform their assigned duties in a safe and healthful manner so as not to endanger themselves or other employees.	OSHA requirement meets or exceeds RCRA.
264.16(c) Facility personnel must successfully complete the program within six months of their assignment to a facility.	1910.120(p) and 1910.120 App E - *Training Curriculum Guidelines - (Non-mandatory)* Initial training should be provided prior to beginning work.	OSHA requirement more stringent than RCRA.
264.16(c) Facility personnel must take part in and annual review of the training program.	1910.120(p)(7) Refresher training is required annually. OSHA specifies 8 hr. Training.	OSHA requirement is more stringent than RCRA.
264.16(a)(1) Employees Covered--Training is required for Facility personnel. 1910.120(p)(7)	1910.120(p) (7) Employees Covered--Only employees exposed to health hazards or hazardous substances.	Some employees may require training under

RCRA Training Requirement	OSHA Training Requirement	Comment
264.16(d) Training Records Maintenance--The owner/operator must maintain documentation of training at the facility.	1910.120 App E - *Training Curriculum Guidelines - (Non-mandatory)* Records should be maintained by the training provider.	OSHA requirement is the same as RCRA.
264.16(e) Training Records Retention--Training records on current personnel must be kept until facility closure; records for former employees must be kept for three years.	1910.120 App. E - *Training Curriculum Guidelines - (Non-mandatory)* Training records should be maintained for a minimum of five years after an individual participated in a training program.	OSHA requirement is generally less restrictive than RCRA
264.16(d) Recordkeeping—The owner/operator must maintain the following: (1)The job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; (2) A written job description for each position; (3) a description of the amount and type of both initial and continuing training that will be given to each person; (4) documentation that required training was provided to appropriate facility personnel.	1910.120 App. E - *Training Curriculum Guidelines - (Non-mandatory)* Records should list the dates courses were presented, the names of attendees, names of those students successfully completing each course, and the number of training certificates issued to each successful student.	RCRA requires more detailed recordkeeping than OSHA.
Training Course Content 264.16 (a) (3) and *Permit Applicant Guidance Manual for General Facility Standards of 40 CFR 264*. (See specific training core requirements/guidelines below)	Initial Training Course Content 1910.120(p)(7) and 1910.120 App. E - *Training Curriculum Guidelines -RCRA Operations Training for Treatment, Storage, and Disposal Facilities* and other OSHA regulations as specified (See specific training core requirements/guidelines below)	See specific training core requirements /guidelines below. Note that OSHA allows employers who can show by previous experience or training that employees have had equivalent training do not need to reaccomplish initial training.
1. Elements of the RCRA Contingency Plan	1. Emergency response plan (RCRA Contingency Plan is acceptable) including emergency alerting and response procedures, emergency equipment, pre-emergency planning and review of emergency contingency plans.	OSHA requirement is generally the same as RCRA.

RCRA Training Requirement	OSHA Training Requirement	Comment
2. Communications or alarm systems	2. Emergency response plan including emergency alerting and response procedures	OSHA requirement is generally the same as RCRA.
3. Standard operating procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment	3. Emergency response plan including emergency alerting and response procedures, emergency equipment, pre-emergency planning	RCRA requires more detail than OSHA.
4. Key parameters for automatic waste feed cut-off systems	4. Not covered in training curriculum	RCRA requires more detail than OSHA.
5. Response to fires, explosions, groundwater contamination incidents and shutdown of operations	5. Emergency Response program training; review of fire and explosion hazards	OSHA requirement is generally the same as RCRA.
6. Chemical characteristics of wastes	7. Review of chemical and biological hazards; principles of toxicology	OSHA requirement is generally the same as RCRA.
7. Types and limitations of personal protective equipment	8. Review and hands-on exercise with personal protective equipment. Annual refresher training for respirator wearers is required.	OSHA requires more detail than RCRA.
8. Proper operation of industrial trucks and other machinery	9. Forklift and industrial truck driver training program(1910.178(l)0	OSHA requires more detail than RCRA.
9. Basic first aid	10. Emergency response plan and procedures including first aid	OSHA requirement is generally the same as RCRA.

Exhibit 10: Local Emergency Planning Committee Contact List

PLANNING DISTRICT	TIER II SUBMISSIONS	DIRECT QUESTIONS TO
ALLEGANY COUNTY Chairman: Mr. James Swauger Phone: 301-759-5040 Fax: 301-876-9160 jswauger@dhmh.state.md.us	**Allegany County LEPC** c/o Allegany County Department of Public Safety Emergency Management Division 11400 PPG Road SE Cumberland MD 21502	**Susan Lee** Phone: 301-876-9155 Fax: 301-876-9160 slee@allconet.org
ANNE ARUNDEL COUNTY Chairman: Mr. Michael F. O'Connell Phone: 410-222-0605 Fax: 410-222-0690 fdoconn@aacounty.org	**Anne Arundel County LEPC** c/o Anne Arundel County Office of Emergency Management 7480 Baltimore-Annapolis Boulevard Suite 102 Glen Burnie MD 21061	**Michael F. O'Connell** Phone: 410-222-0605 Fax: 410-222-0690 fdoconn@aacounty.org
BALTIMORE CITY Chairman: Mr. Robert Maloney Phone: 410-396-6188 Fax: 410-532-6125 robert.maloney@baltimorecity.gov	**Baltimore City LEPC** c/o Baltimore City Emergency Operations Center 1201 East Cold Spring Lane Baltimore MD 21239	**Kevin Cleary** Phone: 410-396-6188 Fax: 410-323-1025 kevin.cleary@baltimorecity.gov
BALTIMORE COUNTY Chairman: Captain Scott Russell Phone: 410-887-5996 Fax: 410-832-8515 srussell@baltimorecountymd.gov	**Baltimore County LEPC** c/o Baltimore County Fire Department 700 East Joppa Road Towson MD 21286	**Theresa Brush** Phone: 410-887-5996 Fax: 410-832-8515 tbrush@baltimorecountymd.gov
CALVERT COUNTY Chairman: Mr. Alfred Jeffrey Phone: 410-535-1600 X2781 Fax: 410-535-3997 jefferab@co.cal.md.us	**Calvert County LEPC** c/o Calvert County Emergency Management Division 175 Main Street, Courthouse Prince Frederick MD 20678	**Alfred Jeffrey** Phone: 410-535-1600 X 2781 Fax: 410-535-3997 jefferab@co.cal.md.us

PLANNING DISTRICT	TIER II SUBMISSIONS	DIRECT QUESTIONS TO
CAROLINE COUNTY Chairman: Mr. Bryan Ebling Phone: 410-479-2622 bcebling@carolinemd.org	**Caroline County LEPC** c/o Caroline County Department of Emergency Management 7 North First Street Denton MD 21629	**Cindy Towers** Phone: 410-479-2622 Fax: 410-479-4200 ctowers@carolinemd.org
CARROLL COUNTY Chairman: Mr. Thomas J. Jeffers Phone: 410-386-2756 Fax: 410-848-3794 tjeffers@carrollhopsitalcenter.org	**Carroll County LEPC** c/o Carroll County Office of Public Safety Emergency Management 225 North Center Street Westminster MD 21157	**Douglas W. Brown** Phone: 410-386-2296 Fax: 410-848-3794 dbrown@ccg.carr.org
CECIL COUNTY Chairman: Mr. Richard Brooks Phone: 410-392-2014 Fax: 410-398-0536 richard.brooks@ccdps.org	**Cecil County LEPC** c/o Cecil County Department of Emergency Services 107 Chesapeake Boulevard Suite 108 Elkton MD 21921	**Sandy Biggs** Phone: 410-392-2012 Fax: 410-398-0536 sandy.biggs@ccdps.org
CHARLES COUNTY Chairperson: Mr. William Stephens Phone: 301-609-3401 Fax: 301-609-3410 stephenw@charlescounty.org	**Charles County LEPC** c/o Charles County Emergency Services P.O. Box 2150 10425 Audie Lane LaPlata MD 20646	**Michelle Lilly** Phone: 301-609-3429 Fax: 301-392-3796 lillym@charlescounty.org
DORCHESTER COUNTY Chairperson: Mr. Stephen Garvin Phone: 410-228-1818 Fax: 410-228-1216 sgarvin@docogonet.com	**Dorchester County LEPC** c/o Dorchester County Emergency Management Agency 829 Fieldcrest Road Cambridge MD 21613	**Stephen Garvin Phone:** 410-228-1818 Fax: 410-228-1216 sgarvin@docogonet.com
FREDERICK COUNTY Chairman: Mr. Seamus Mooney Phone: 301-600-1746 Fax: 301-600-6026 smooney@frederickcountymd,gov	**Frederick County LEPC** c/o Frederick County Department of Emergency Preparedness 5370 Public Safety Place Frederick, MD 21704	**Rhonda Cunningham** Phone: 301-600-1746 Fax: 301-600-6026 ema@frederickcountymd.gov

PLANNING DISTRICT	TIER II SUBMISSIONS	DIRECT QUESTIONS TO
GARRETT COUNTY Chairman: Mr. John Frank Phone: 301-334-7619 Fax: 301-746-6285 jfrank@garrettcounty.org	**Garrett County LEPC** Garrett County Emergency Management 771 Airport Road Accident MD 21520	**John Frank** Phone: 301-334-7619 Fax: 301-764-6285 jfrank@garrettcounty.org
HARFORD COUNTY Chairman: Mr. Richard Schwanke Phone: 410-638-4904 Fax: 410-879-5091 flbuchanan@harfordpublicsafety.org	**Harford County LEPC** c/o Harford County Division of Emergency Operations 2220 Ady Road Forest Hill MD 21050	**Mr. Forney Buchanan** Phone: 410-638-4904 Fax: 410-879-5091 fbuchanan@harfordpublicsafety.org
HOWARD COUNTY Chairman: Mr. Ryan Miller Phone: 410-313-6030 Fax: 410-461-0009 ramiller@howardcountymd.gov	**Howard County LEPC** c/o Howard County Fire and Rescue Office of Emergency Management 3430 Courthouse Drive Ellicott City MD 21043	**Ms. Amanda Faul** Phone: 410-313-0717 Fax: 410-461-0009 afaul@howardcountymd.gov
KENT COUNTY Chairman: Mr. Wayne Darrell Phone: 410-778-7458 Fax: 410-778-4601 wdarrell@kentgov.org	**Kent County LEPC** c/o Kent County Office of Emergency Services 104 Vickers Drive Unit D Chestertown MD 21620	**Ethel K. Duhamell** Phone: 410-810-2276 Fax: 410-778-4601 eduhamell@kentgov.org
MONTGOMERY COUNTY Chairman: Mr. Charles Crisostomo Phone: 240-777-2300 Fax: 240-777-2345 charles.crisostomo@montgomerycountymd.gov	Montgomery County LEPC c/o Office of Emergency Management and Homeland Security 100 Edison Park Drive Gaithersburg MD 20878 Attn: Barbara Moore	**Barbara Moore** Phone: 240-777-2327 barbara.moore@montgomerycountymd.gov or Michael Goldfarb Phone: 240-777-2201 michael.goldfarb@montgomerycountymd.gov

PLANNING DISTRICT	TIER II SUBMISSIONS	DIRECT QUESTIONS TO
OCEAN CITY Chairman: Mr. Joseph Theobald Phone: 410-723-6650 Fax: 410-723-6962 jtheobald@oceancitymd.gov	**Ocean City LEPC** c/o Ocean City Emergency Services Public Safety Building 6501 Coastal Highway Ocean City MD 21842	**Bob Rhode** Phone: 410-723-6650 Fax: 410-723-6962 brohde@oceancitymd.gov
- - - -	**Prince George's County LEPC** c/o Prince George's County Office of Emergency Management 7915 Anchor Street Landover, MD 20785	- - - - - -
QUEEN ANNE'S COUNTY Chairman: Mr. Scott Haas Phone: 410-758-4500 X1116 Fax: 410-758-2086 shaas@qac.org	**Queen Anne's County LEPC** c/o Queen Anne's County Department of Emergency Services 100 Communications Drive Centerville MD 21617	**Dave Rivett** Phone: 410-758-4500 X1121 Fax: 410-758-2086 drivett@qac.org
SOMERSET COUNTY Chairman: Mr. Robert Lee Price Phone: 410-651-3457 Fax: 410-651-3350 rprice@somersetmd.us	**Somerset County LEPC** c/o Somerset County Department of Emergency Services 11916 Somerset Avenue Princess Anne MD 21853	**Victoria Lloyd** Phone: 410-651-3457 Fax: 410-651-3350 vlloyd@somersetmd.us
ST. MARY'S COUNTY Chairman: Mr. Gerald Gardiner Phone: 301-475-4200 X2124 Fax: 301-475-4924 gerald.gardiner@stmarysmd.com	**St. Mary's County LEPC** c/o St. Mary's County Department of Public Safety 23090 Leonard Hall Drive P.O. Box 653 Leonardtown MD 20650	**Gerald Gardiner** Phone: 301-475-4200 X2124 Fax: 301-475-4924 gerald.gardiner@stmarysmd.com
TALBOT COUNTY Chairman: Mr. Dana Meintzer Phone: 410-822-4335 Fax: 410-770-8145 meinbros@goeaston.net	**Talbot County LEPC** c/o Talbot County Emergency Services 605 Port Street Easton MD 21601	**Jim Bass** Phone: 410-770-8160 Fax: 410-770-8145 jbass@talbotcountymd.gov

PLANNING DISTRICT	TIER II SUBMISSIONS	DIRECT QUESTIONS TO
WASHINGTON COUNTY Chairman: Mr. Kevin Lewis Phone: 240-313-4363 Fax: 240-313-2901 klewis@washco-md.net	**Washington County LEPC** c/o Division of Emergency Services 16232 Elliott Parkway Williamsport MD 21795	**Sam Anderson** Phone: 240-313-4371 Fax: 240-313-2901 sanderson@washco-md.net
WICOMICO COUNTY Chairman **TBD** Phone: 410-548-4809 Fax: 410-341-6031	**Wicomico County LEPC** c/o Wicomico County Department of Emergency Services 411 Naylor Mill Rd., Suite 200 Salisbury MD 21801	**Mr. Lorenzo Cropper** Phone: 410-548-4880 Fax: 410-341-6031 lcropper@wicomicocounty.org
WORCESTER COUNTY Chairman: Mr. Fred Webster Phone: 410-632-1311 Fax: 410-632-4686 fwebster@co.worcester.md.us	**Worcester County LEPC** c/o Worcester County Emergency Services 1 West Market Street, Room 1002 Snow Hill MD 21863	**Kristin Jester** Phone: 410-632-1311 Fax: 410-632-4686 kjester@co.worcester.md.us

State Emergency Response Commission (SERC) for Tier Two Reporting

Mail To: MDE-SSA
1800 Washington Boulevard, Suite 540
Baltimore, MD 21230
Attention: Patricia Williams

Tier Two Reporting questions: Patricia Williams (410) 537-3800 Patricia.williams1@maryland.gov

Revised 1/06/2016

Exhibit 11: MDE Contact List

Maryland Department of the Environment
Emergency Response & Planning Program
1800 Washington Blvd, Baltimore, MD 21230
Phone: 866-633-4686
http://www.mde.state.md.us

Employee Name	Title	Phone Number
Rose Clark	Environmental Compliance Specialist Supervisor	410-537-3975
Brian Cosgrove	Environmental Compliance Specialist	410-537-3975
James Hausner	Environmental Compliance Specialist	410-537-3975
Thomas Levering	Director, Emergency Planning and Preparedness Program	410-537-4460
Michael Polinski	Environmental Compliance Specialist	410-537-3975
Paul Schlotterbeck	HAZMAT Response Officer I	410-537-4479
Lisa Witriol	Health Physicist Trainee	410-537-3990
Zachary Zaykoski	Environmental Compliance Specialist	410-537-3975

Exhibit 12: Contingency Plan Review and Amendment Log

DATE	CHANGES MADE / ANNUAL REVIEW	NAME

Exhibit 13: Bldg. 53 and Bldg. 214 Waste Staging Areas

Bldg 53 in the foreground and Bldg 214 in the background. As viewed from the northwest.

Bldg 214 and Conex containing spill response supplies. As viewed from the northwest.

Exhibit 13: Bldg. 53 and Bldg. 214 Waste Staging Areas (cont.)

Bldg 214 and Spill Response Supplies Conex; as viewed form the north.

Bldg 214, as viewed from the west. Note 214 Annex (small Conex) on the right hand side.

Exhibit 13: Bldg. 53 and Bldg. 214 Waste Staging Areas (cont.)

Bldg 214 Annex; used to process and store certain small hazardous and non-hazardous waste streams (see attached map and legend); as viewed from the south.

Exhibit 13: Bldg. 53 and Bldg. 214 Waste Staging Areas (cont.)

Left hand picture: 214 Annex fire suppression system, alarm, light and fan switches, control panel and electrical connections. As viewed from the east.

Right hand picture: Drums and equipment used to process and store hazardous and non-hazardous wastes. Note that, since each is a separate waste stream from separate processes, each container represents an individual Satellite Accumulation Area (SAA). As viewed from the south.