

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Appendix (A) Part II identifies the minimum HW training required, for personnel identified in Section 2d below.

2. Initial and annual refresher HW training is required for all personnel in this Section. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Appendix (A) Part I will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Activity personnel involved in transportation of HW required for the implementation of this Order.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

- (1) Collection, handling, storage and transportation of HW.
- (2) Inspection, and related follow-up, of HW handling/storage areas.
- (3) Response to HW spills and related emergencies.
- (4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

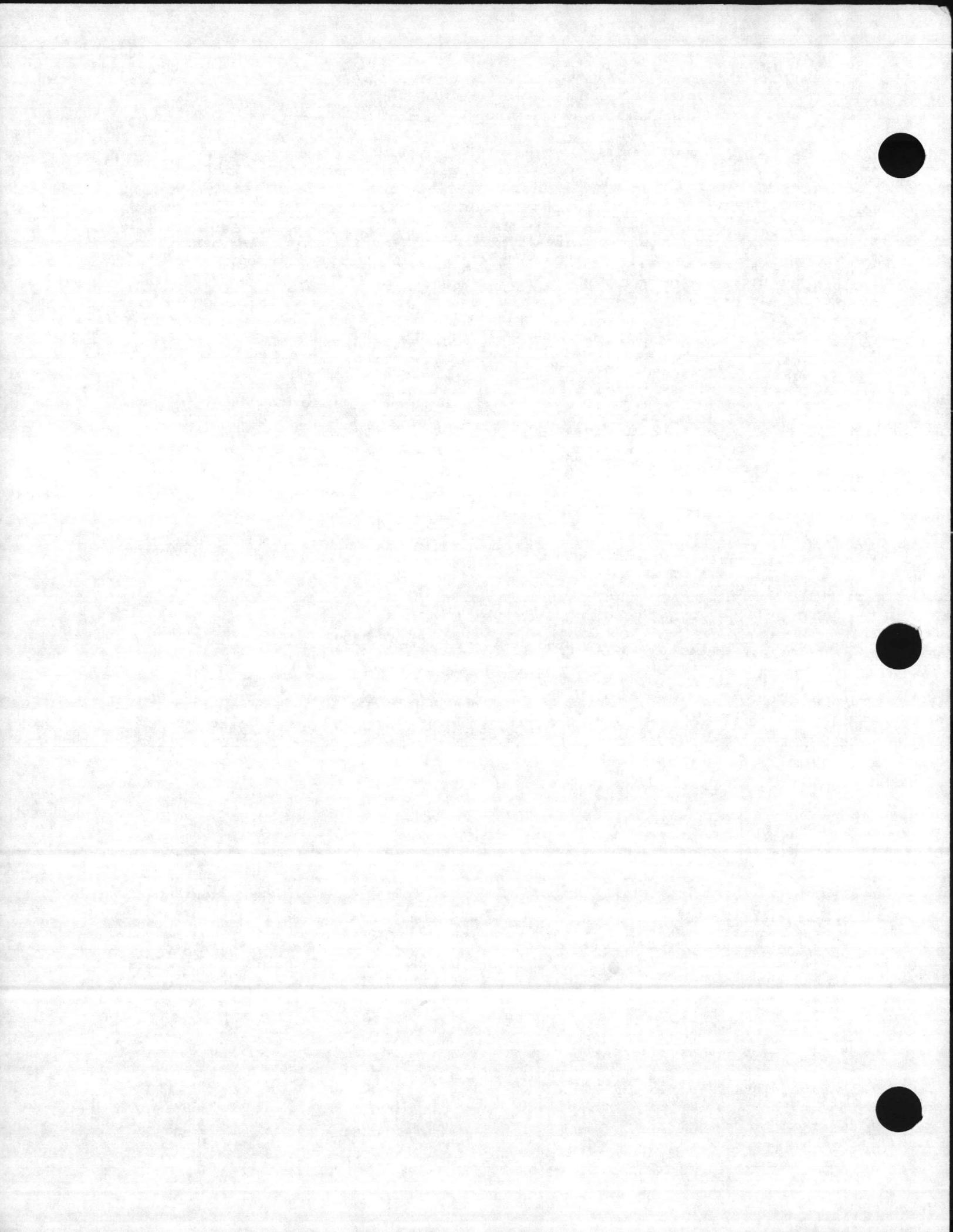
- a. Fire Protection personnel
- b. Safety specialists
- c. Environmental staff
- d. Industrial hygienists

Preparation of Appendix A for these staff specialists and emergency personnel is not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

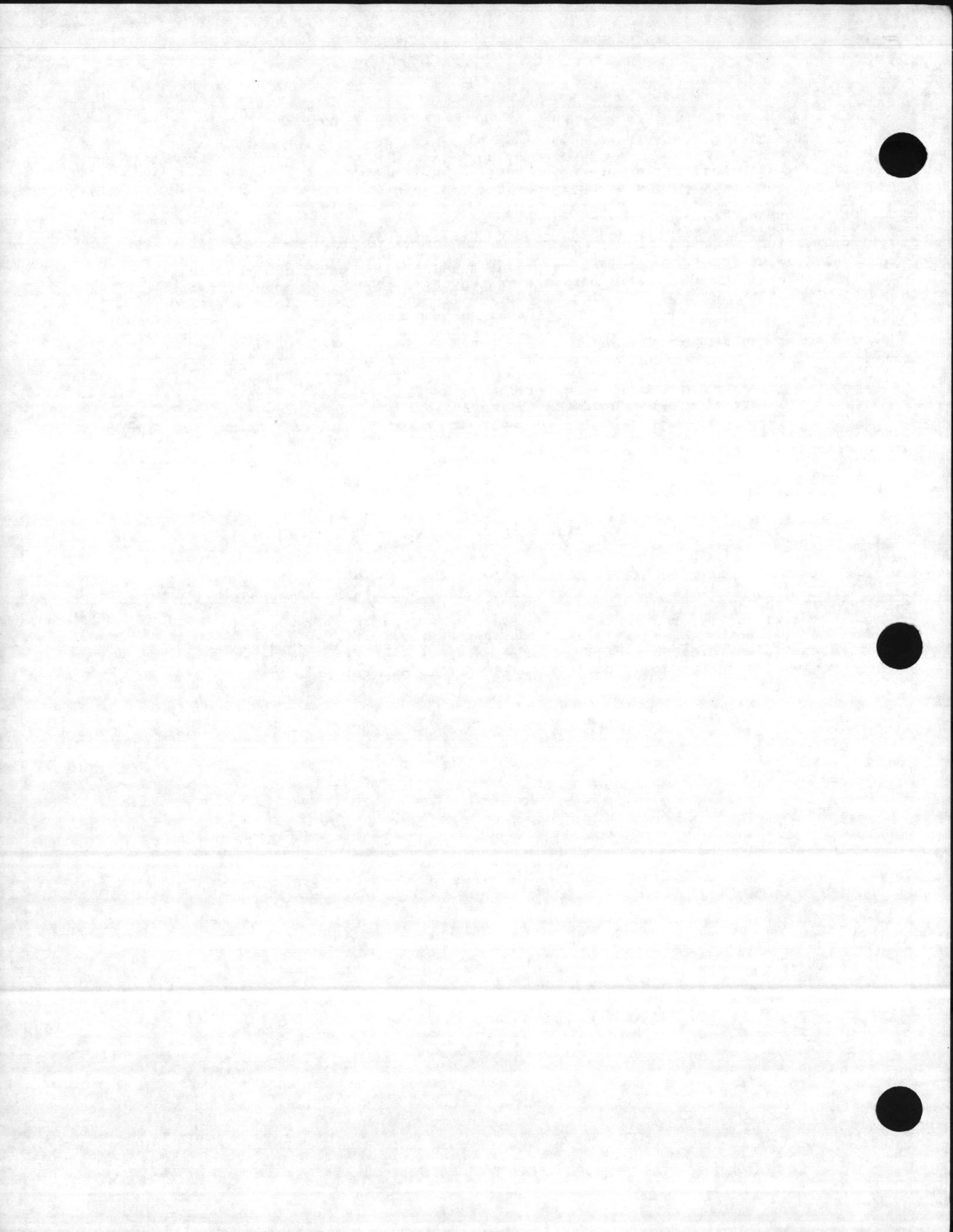
4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Facilities. The following officials are responsible for notifying Assistant Chief of Staff, Facilities of specialized training requirements of their subordinates and other personnel as shown.

- a. The DRMO for self and subordinates
- b. The Assistant Chief of Staff, Logistics for subordinates.

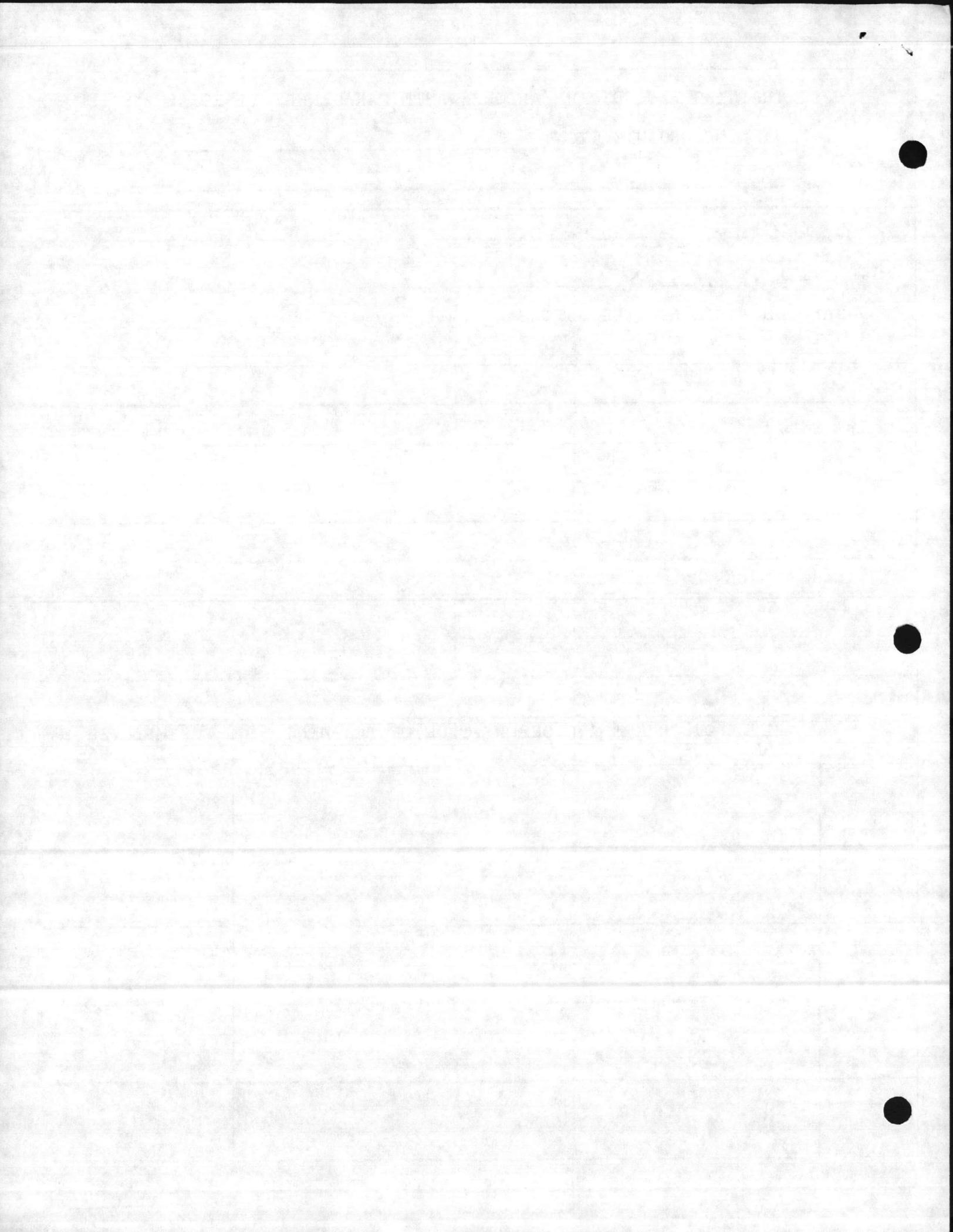
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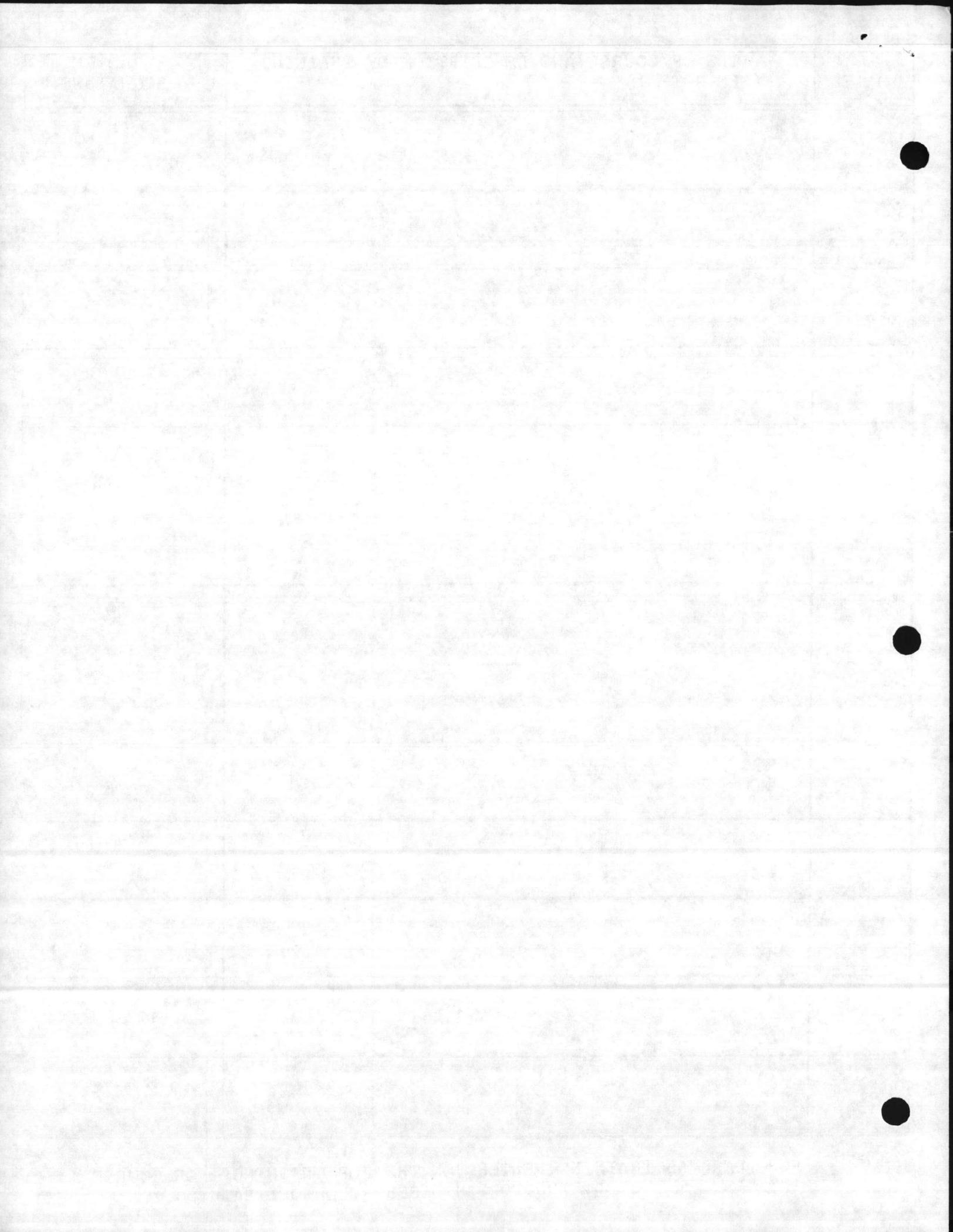
- c. HMDC's for personnel shown in 2d above within HMDC's cognizance
  - d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.
5. Organizational commanders are responsible for developing and implementing plans and procedures to provide RCRA required training and maintain records outlined in Appendix A. Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Facilities representative will coordinate the scheduling and funding of specialized HW training.
6. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:
- a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.
  - b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.
  - c. Assistant Chief of Staff, Logistics will maintain HW training records for all subordinates involved in activities identified in paragraph 2c above.
  - d. HW training records for all employees identified in paragraphs 2(a) - 2(d) will be maintained on Appendix A, Part I. HMDO will maintain HW training records for personnel identified in paragraph 2(d) above. A copy of training records for personnel identified in paragraph 2(d) above will be maintained in HWMSOP.



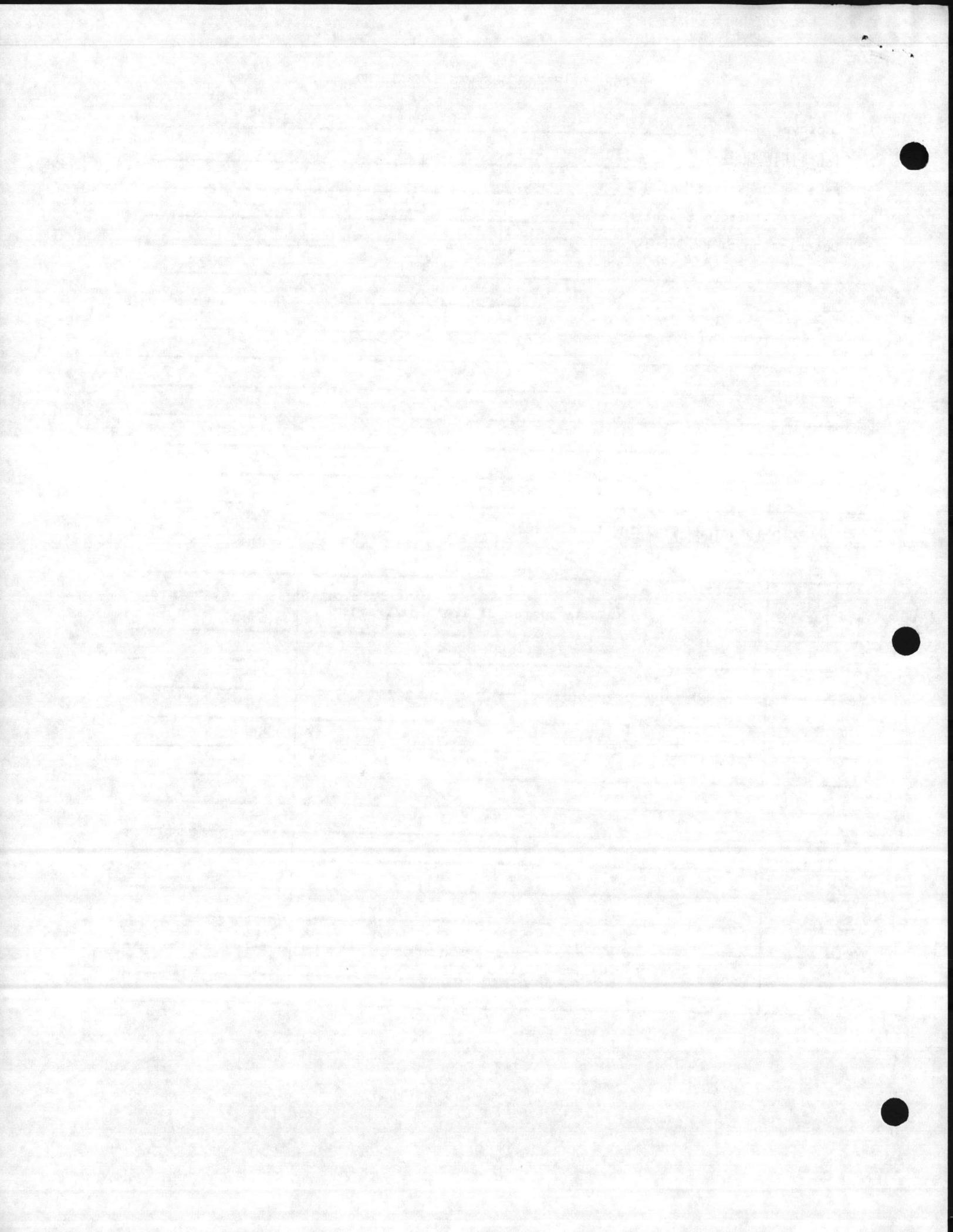




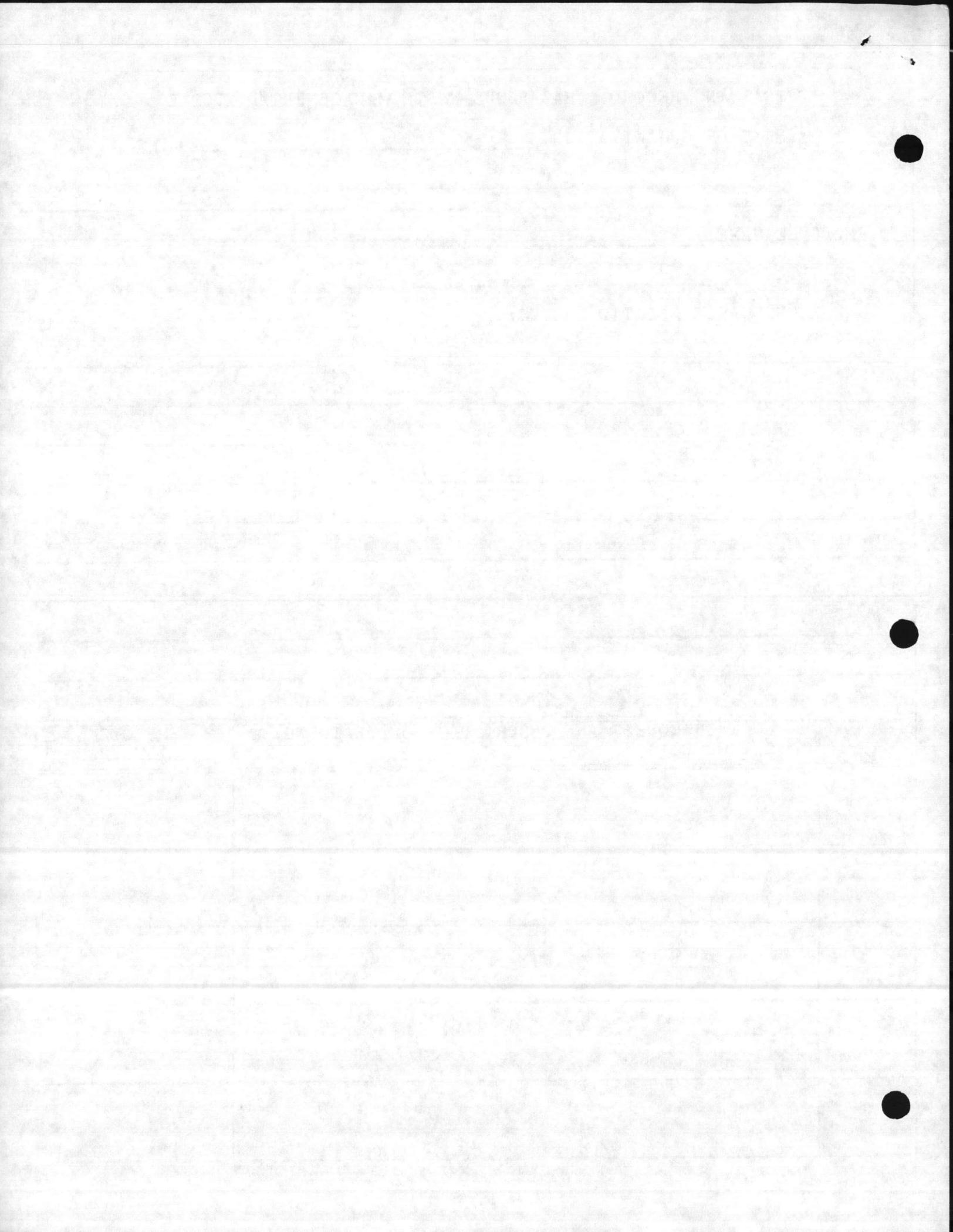




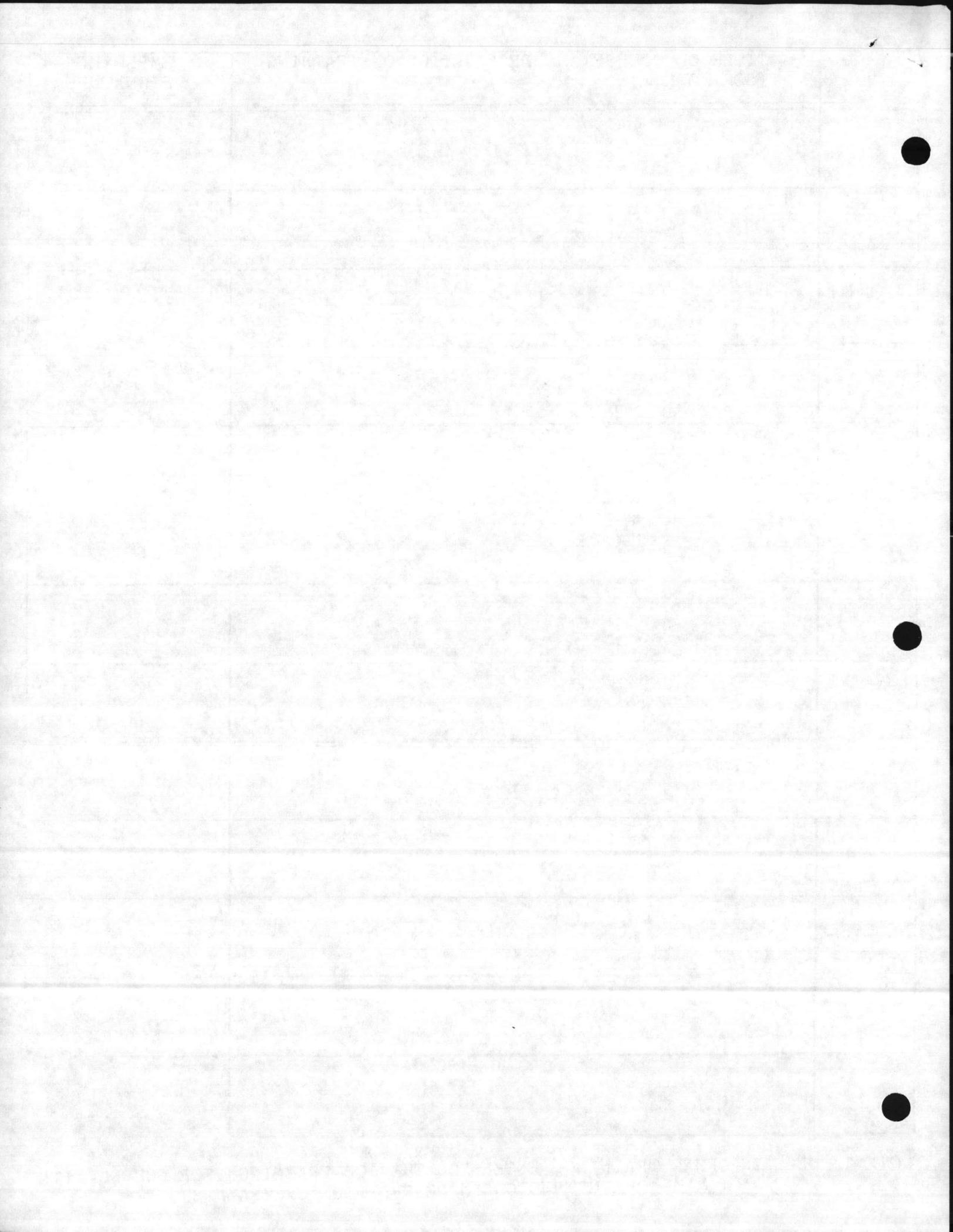




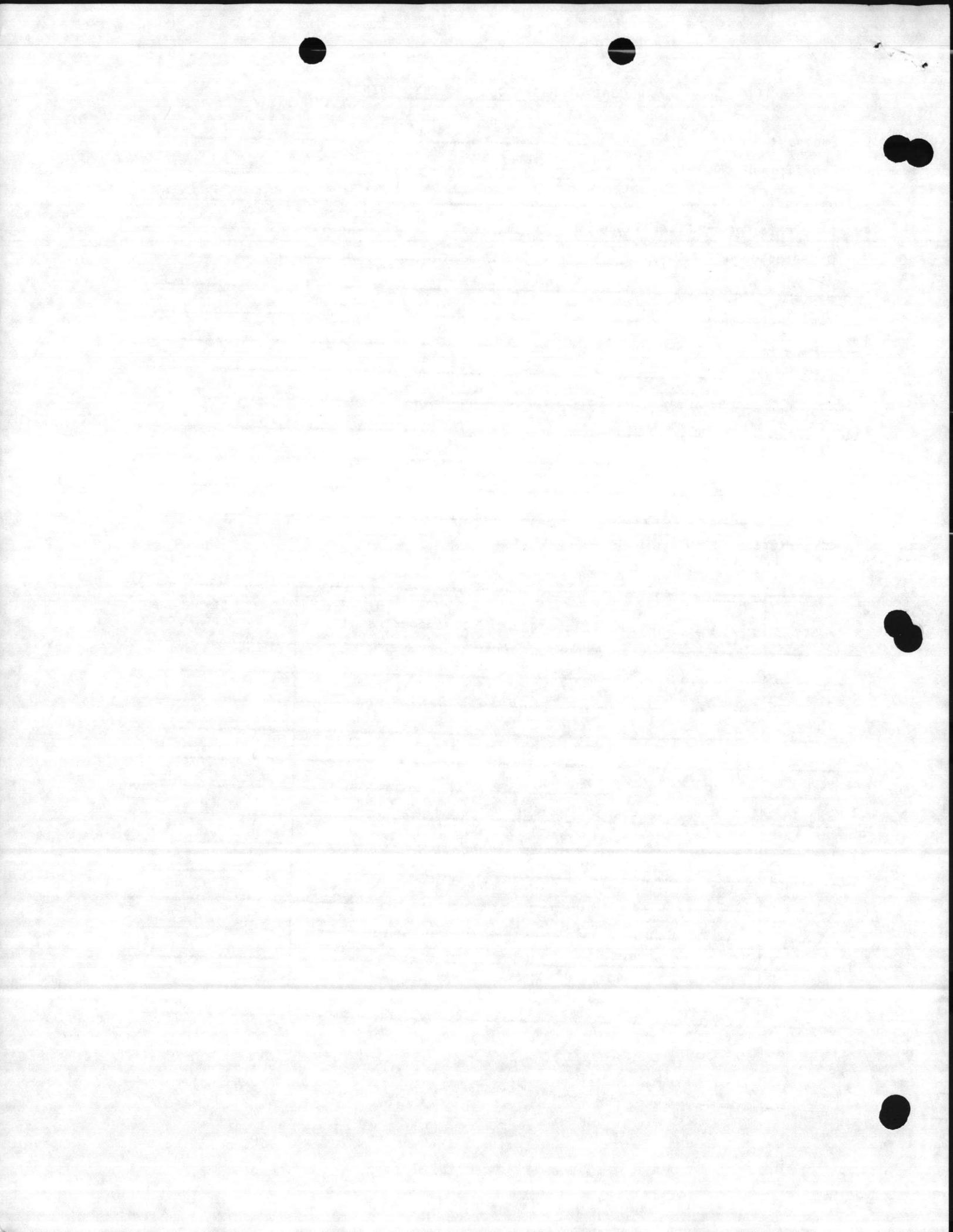




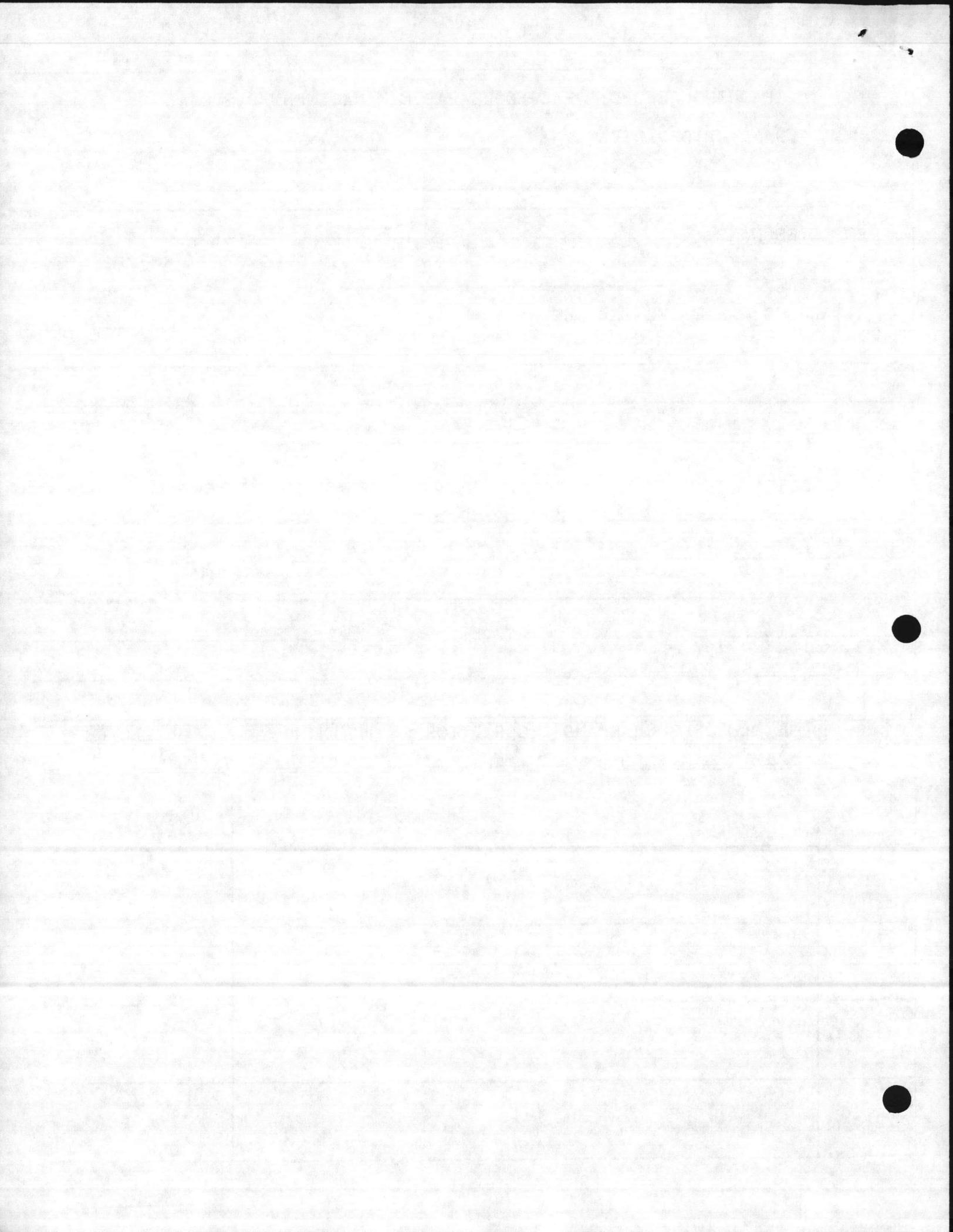




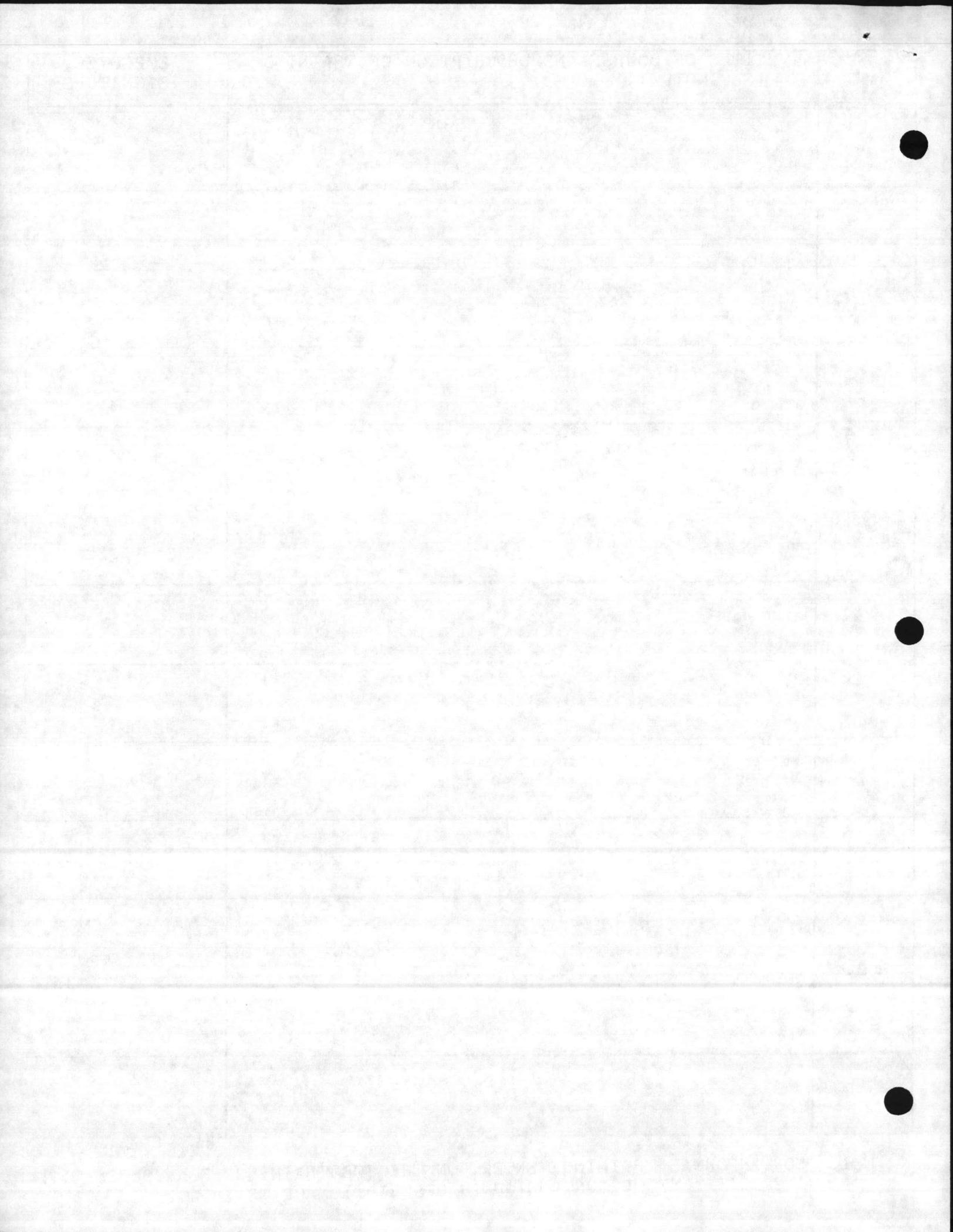




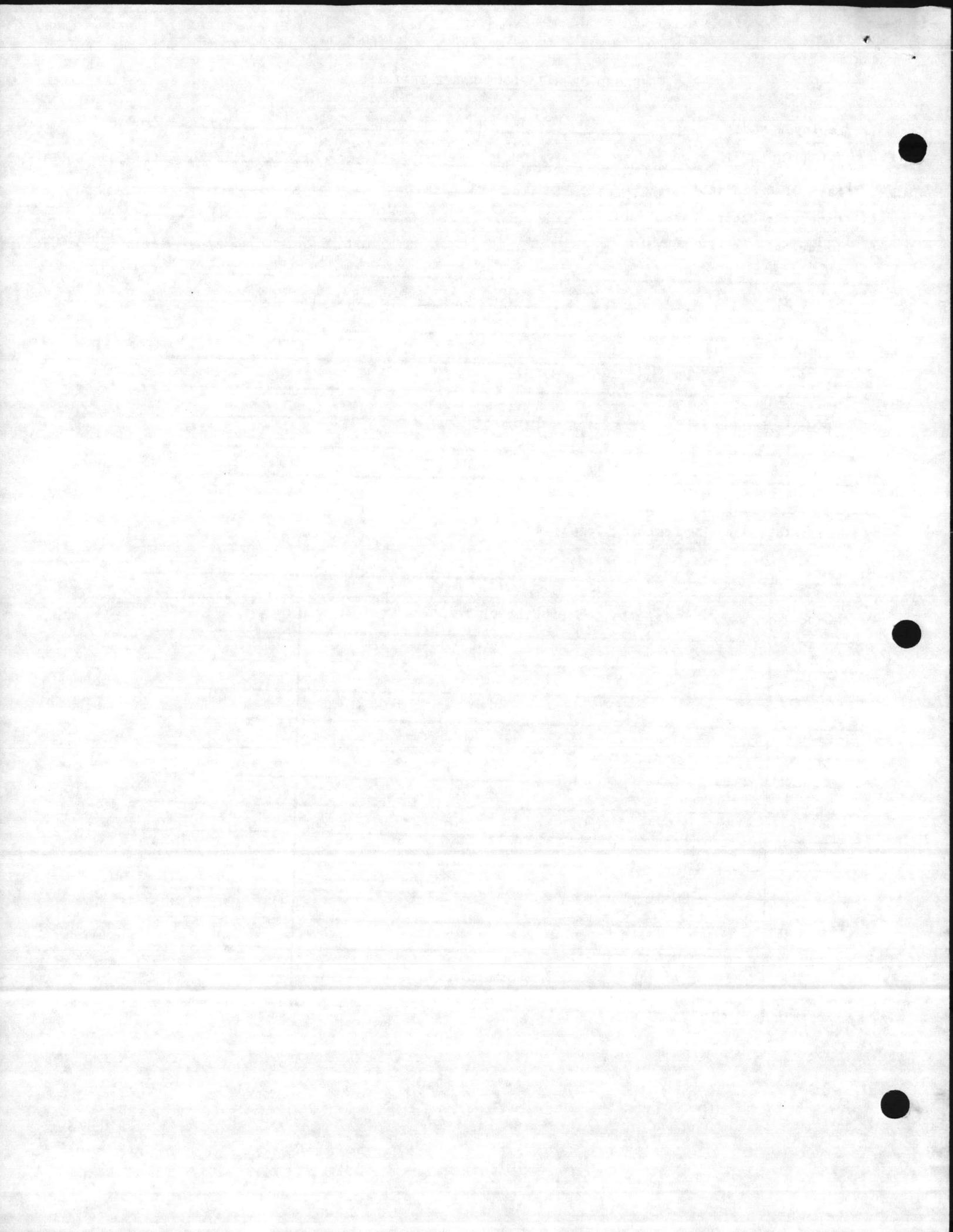




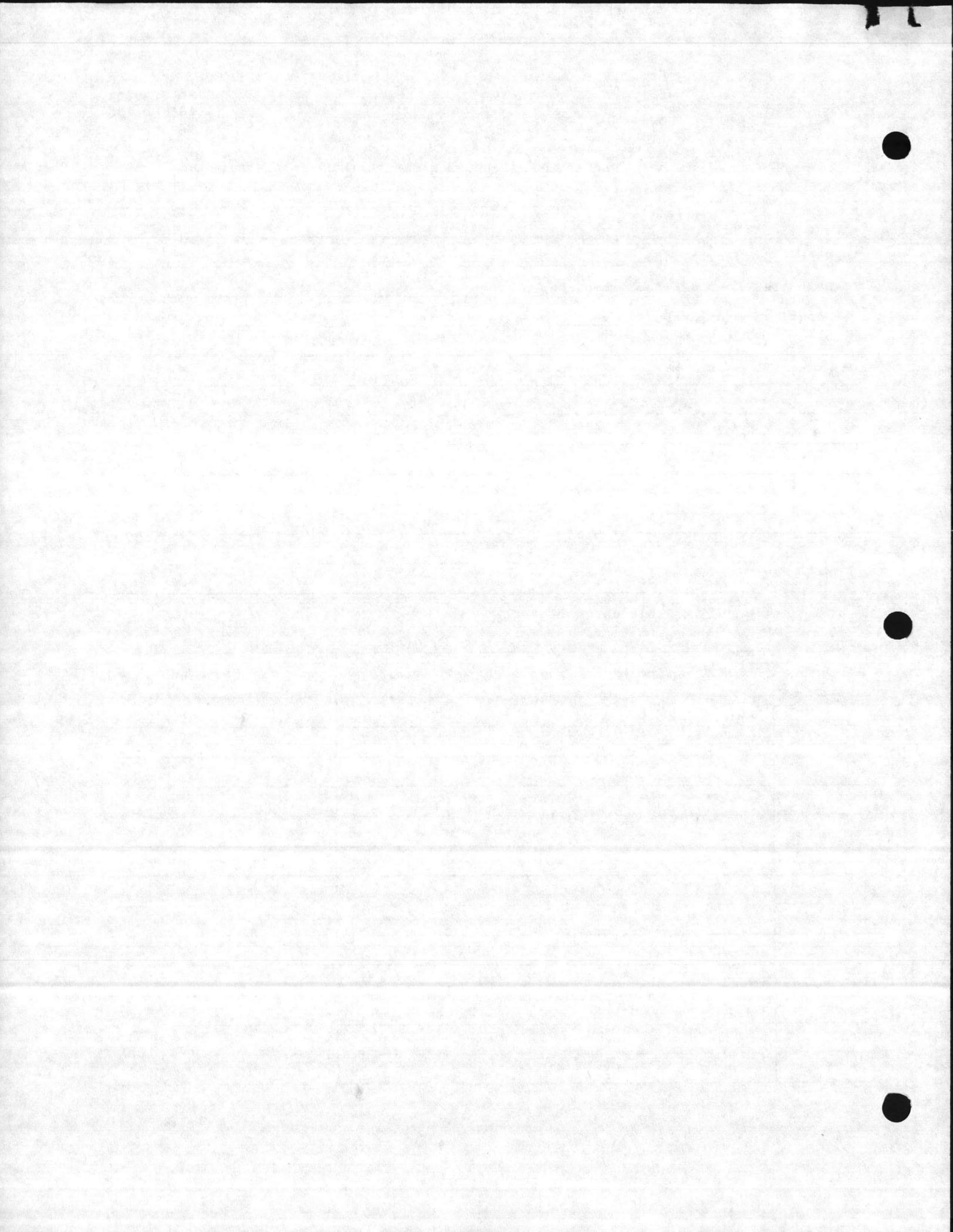




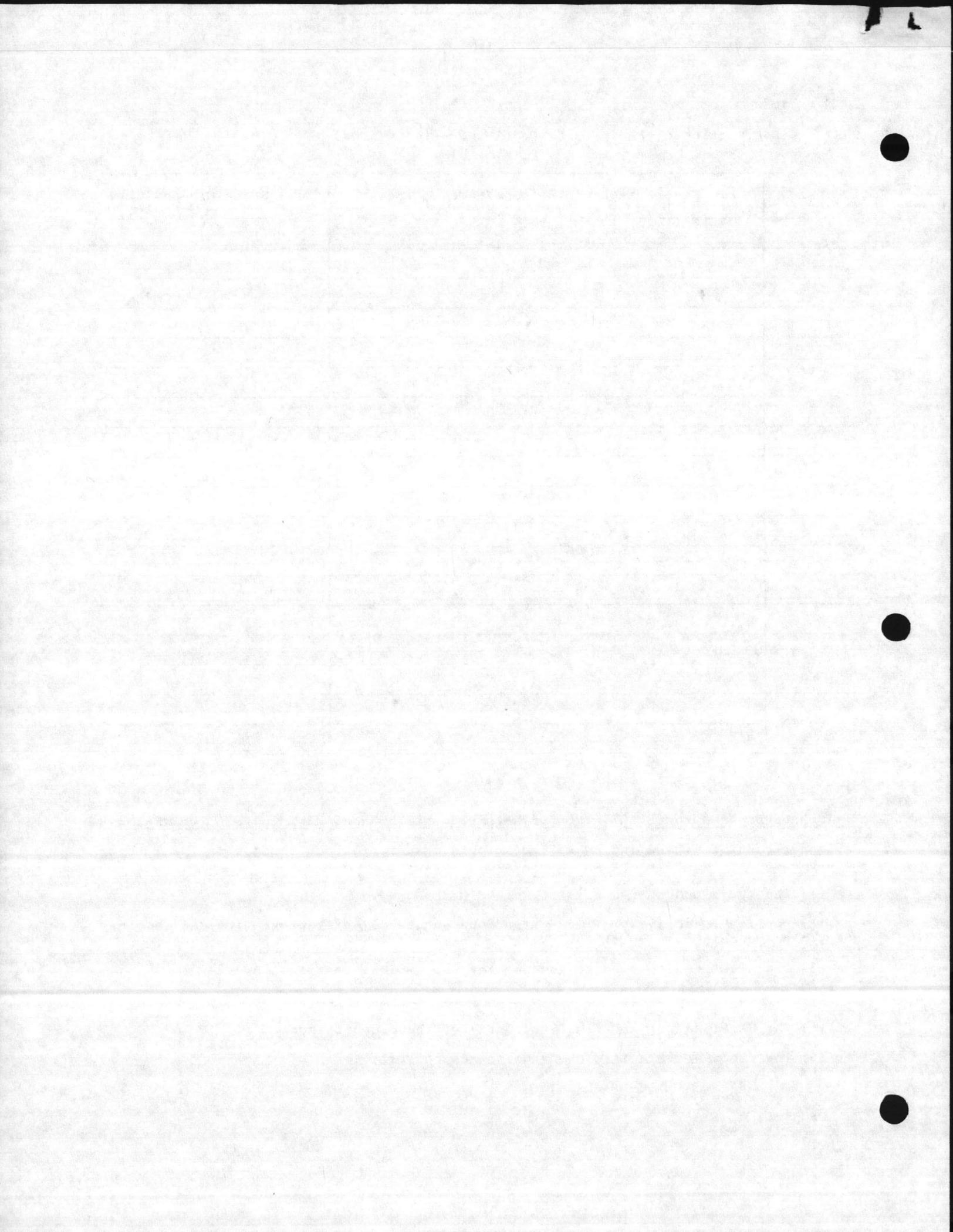




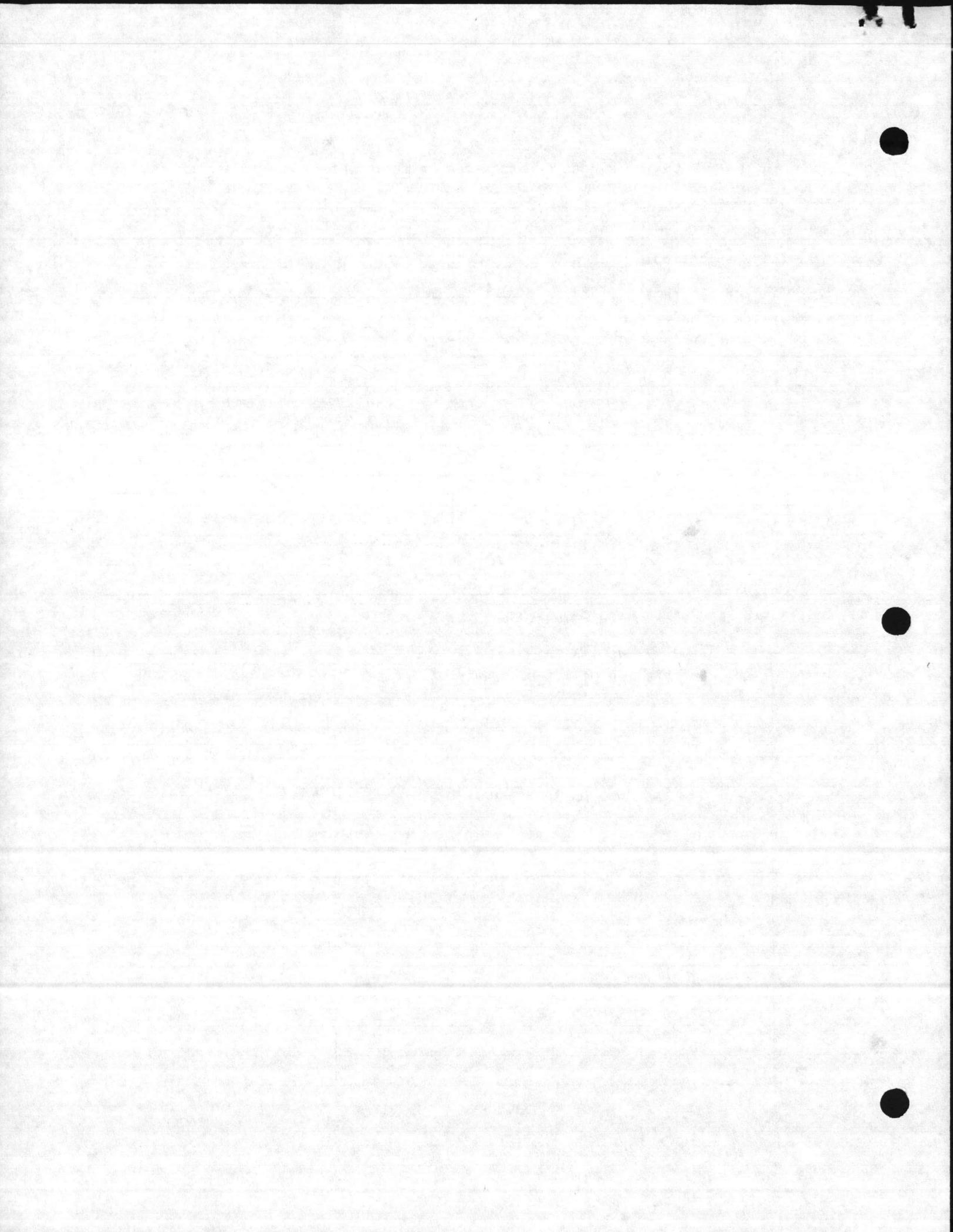














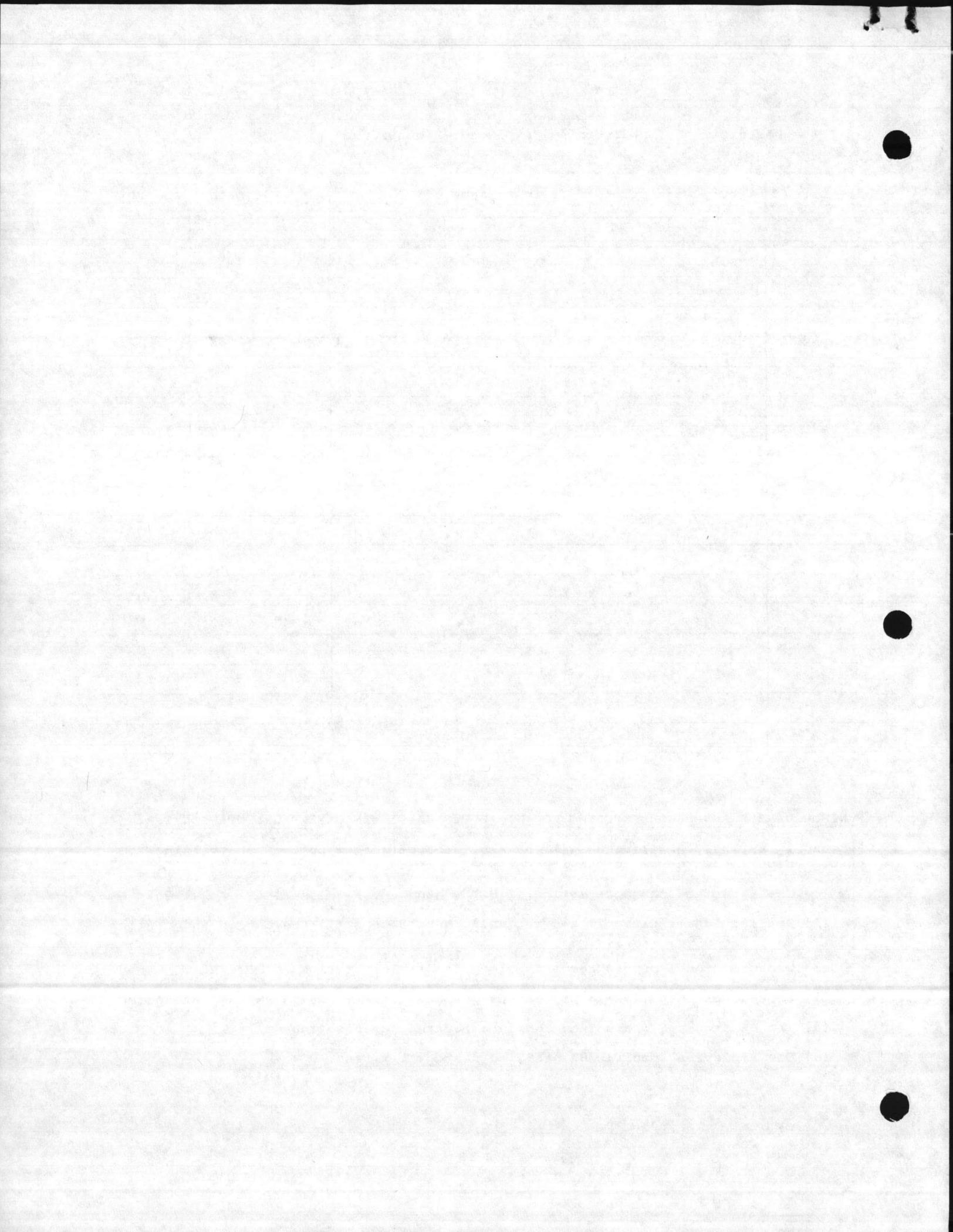
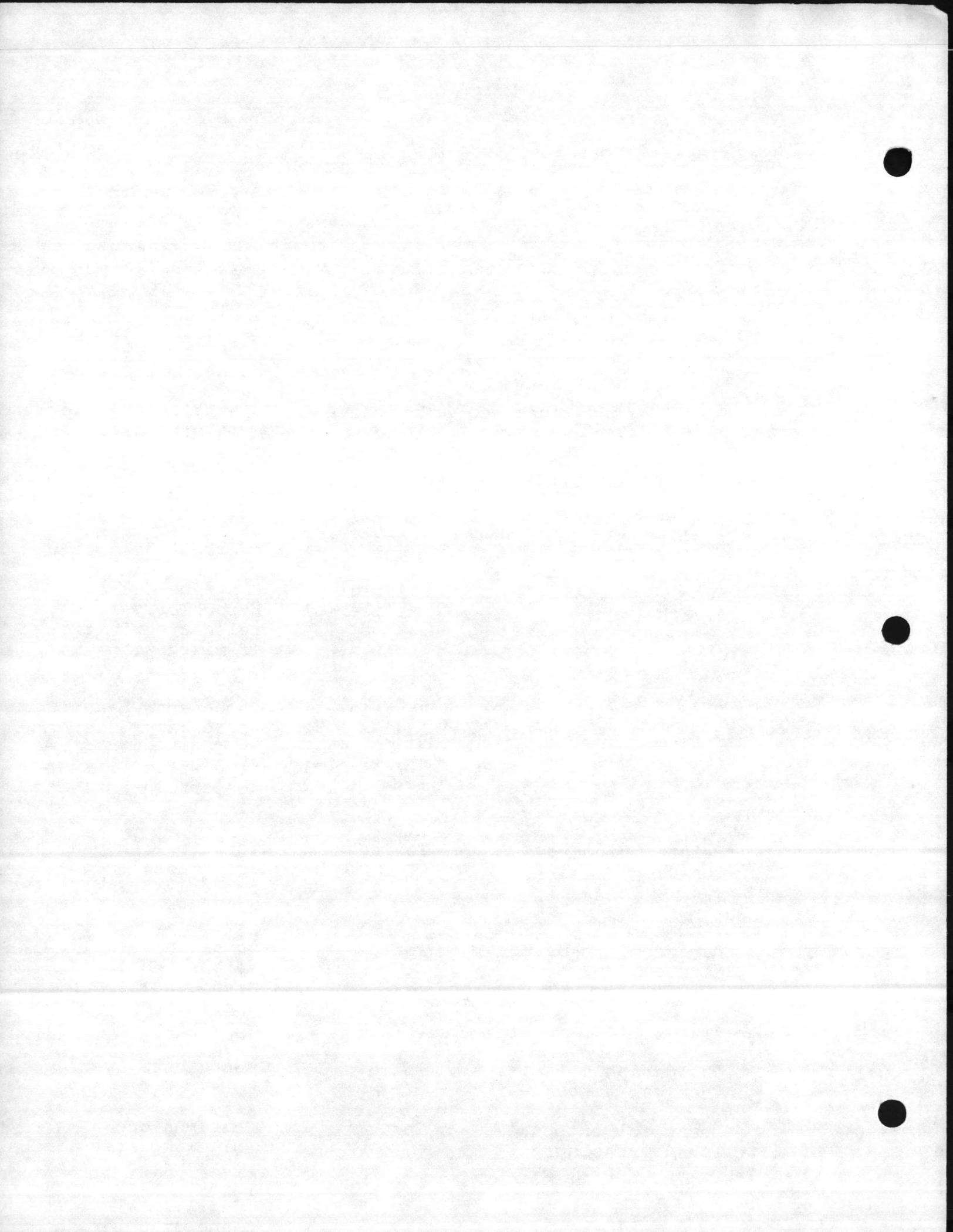


TABLE I

WASTES, ASSOCIATED HAZARDS, AND BASIS FOR HAZARD DESIGNATION:

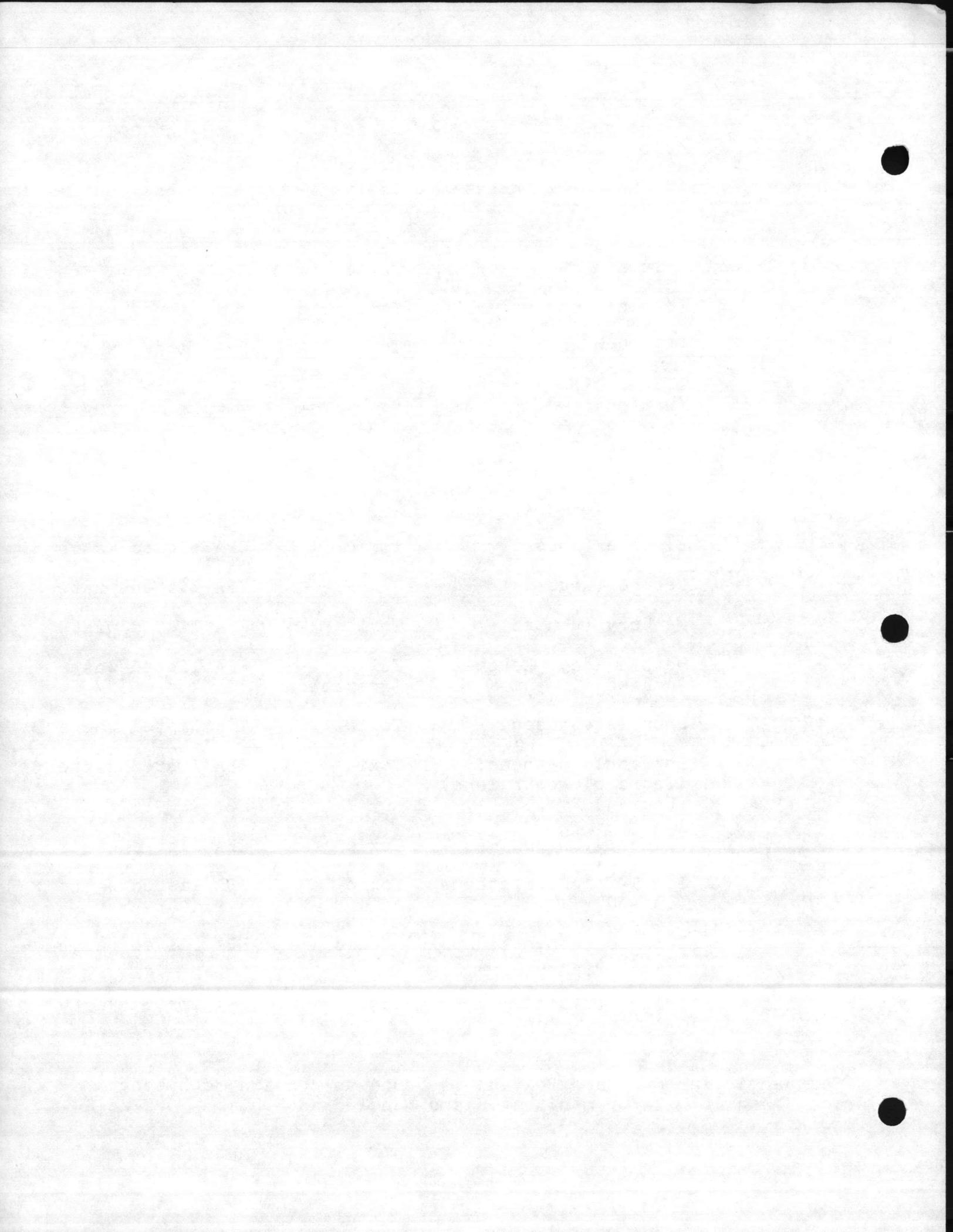
<u>EPA HAZARD WASTE NO.</u>	<u>TYPES OF CHEMICALS</u>	<u>HAZARD(S)</u>	<u>BASIS FOR HAZARD DESIGNATION</u>
D001	Mineral Spirits and Stoddard Solvents (See Note 1)	Ignitable Toxic	Flash point of pure mineral spirits is 100°F.
	Lacquer Paint	Ignitable	Paint is flammable, some have flash points below 140°F.
D002	DS-2, Decontaminating Agent	Corrosive Toxic	Diethylenetriamine, a major constituent (70%) of DS-2, is toxic and corrosive
	Used Electrolyte	Corrosive Toxic	pH of several types of electrolyte are above 12.5 or below
D003	Super Tropical Bleach (STB)	Reactive Oxidizer	Contains Calcium Hypochlorite and can release toxic gases if mixed with water or other chemicals.
	Lithium Batteries	Reactive	Components generate toxic gases, vapors or fumes when mixed with water or exposed to certain pH conditions.
D007	Paint Strippers (used)	Toxic	Contains chromium contamination not properly classified as F009.
D009	Mercury from Meter Maintenance	Toxic	Contains metallic mercury which is in used condition not properly classified as U151.
D011	Photographic Chemical Wastes	Toxic	Contains Silver
F001	Spent solvents used for degreasing	Toxic	Contains one of the following: tetrachloroethylene; trichloroethylene, methylene chloride, 1,1,1-Trichloroethane or chloroform



<u>EPA Hazard Waste No.</u>	<u>Types of Chemicals Generated</u>	<u>Hazard(s)</u>	<u>Basis for Hazard Designation</u>
F002	Spent solvents and paint thinners	Toxic	Same as F001
F003	Spent non-halogenated Solvents	Ignitable	Contains Acetone or Xylene
F005	Spent non-halogenated Solvents	Ignitable Toxic	Contains Toluene, Methyl Ethyl Ketone
U002	Acetone (unused)	Ignitable	EPA listed waste
U061	DDT (unused)	Toxic	EPA listed waste
U076	1,1 Dichloroethane (unused)	Toxic	EPA listed waste
U080	Dichloromethane (unused) (Methylene Chloride)	Toxic	EPA listed waste
U122	Formaldehyde (unused)	Toxic	EPA listed waste
U129	Lindane (unused)	Toxic	EPA listed waste
U142	Kepone (unused)		EPA listed waste
51	Mercury (unused)	Toxic	EPA listed waste
U159	Methyl Ethyl Ketone (unused)	Toxic Ignitable	EPA listed waste
U188	<i>Changed for function with Jimmy Carter on 1 June 1984.</i> Phenols (unused)	Toxic	EPA listed waste
U210	Tetrachloroethene (Tetrachloroethylene) (Unused)	Toxic	EPA listed waste
U220	Toluene (unused)	Toxic	EPA listed waste
U226	1,1,1-Trichloroethane (unused)	Toxic	EPA listed waste
U228	Trichloroethene (unused) (Trichloroethylene)	Toxic	EPA listed waste
U239	Xylene (unused)	Toxic	EPA listed waste

NOTE:

1. If a particular Stoddard Solvent is found to contain Methylene chloride, then it will be manifested and handled as F001 or F002 as appropriate.



WASTE INFORMATION DOCUMENT (WID)

NAME \_\_\_\_\_

WID # \_\_\_\_\_

1. GENERATING WORK CENTER INFORMATION

Shop \_\_\_\_\_ Contract \_\_\_\_\_ Command \_\_\_\_\_ Building: \_\_\_\_\_ Phone ext. \_\_\_\_\_

2. WASTE IDENTIFICATION

A. WASTE NAME: Common \_\_\_\_\_ Chemical(s) \_\_\_\_\_

B. PHYSICAL FORM: (CHECK)  Liquid  Solid  Sludge  Other (Specify) \_\_\_\_\_

C. MANUFACTURER: \_\_\_\_\_ D. NATIONAL STOCK NUMBER: \_\_\_\_\_

E. CONTAINER: (TYPE AND SIZE) \_\_\_\_\_

F. GENERATION RATE: (e.g., gal/day, lbs/day) \_\_\_\_\_

G. FREQUENCY OF GENERATION \_\_\_\_\_

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) \_\_\_\_\_

I. DESCRIBE WASTE GENERATION PROCESS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL?  Yes  No If yes, specify \_\_\_\_\_  
\_\_\_\_\_

3. REASON FOR DISPOSAL: (CHECK)

Exceeded shelf life  Served intended purpose  Unused  Other  
(specify) \_\_\_\_\_

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

HMDO \_\_\_\_\_ DATE \_\_\_\_\_  
Signature

5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. \_\_\_\_\_

HMDC \_\_\_\_\_ DATE \_\_\_\_\_  
Signature

TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. WASTE CHARACTERIZATION: DATE COMPLETED \_\_\_\_\_

7. WASTE CLASSIFICATION: \_\_\_\_\_ Hazardous \_\_\_\_\_ Nonhazardous

8. EPA WASTE NUMBER(S): \_\_\_\_\_

9. REASON FOR HAZARD CLASSIFICATION: \_\_\_\_\_  
\_\_\_\_\_

10. HANDLING INSTRUCTIONS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

11. DTID 1348-1 REQUIRED: \_\_\_\_\_ Yes \_\_\_\_\_ No

12. CONTAINER AND LABELING REQUIREMENTS:

A. DOT/DOD CONTAINER TYPE: \_\_\_\_\_

B. DOT PROPER SHIPPING NAME: \_\_\_\_\_

C. DOT HAZARD CLASS: \_\_\_\_\_

D. UN/NA NUMBER: \_\_\_\_\_

E. ADDITIONAL REQUIREMENTS: (FOR DRMO) \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. SPECIAL PRECAUTIONS AND/OR INSTRUCTIONS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14.

HMDC  
Signature

Code

Date

WASTE IDENTIFICATIONS DOCUMENT (WID)

INSTRUCTIONS FOR HMDO'S

GENERAL INSTRUCTIONS

Indicate the date on which the form is completed. The WID # will be assigned by the HMDC's. Items 1-4 must be completed by the HMDO. Where information is unknown or not applicable indicate accordingly.

1. GENERATING WORK CENTER INFORMATION: self-explanatory
2. WASTE IDENTIFICATION:
  - A. Waste Name - Give common or brand name and chemical composition if known
  - B. Physical Form - self-explanatory
  - C. Manufacturer - As shown on label
  - D. National Stock Number - self-explanatory
  - E. Container - Indicate type and size container in which waste is presently stored (i.e., 55-gallon drum, plastic container, fiberboard box)
  - F. Generation Rate - Indicate the most frequent rate of generation (quantity per day, week, month, year)
  - G. Frequency of Generation - How often and length of time generated (i.e., 8 hrs/day, 7 days/week; 1 day/month; sporadic; one time only)
  - H. Expected Annual Generation - self-explanatory
  - I. Describe Waste Generation Process - Explain the process which results in waste generation in sufficient detail to assist in waste identification
  - J. Waste Mixture - self-explanatory
3. REASON FOR DISPOSAL: self-explanatory
4. CERTIFICATION: WID must be signed by the HMDO
5. Self explanatory; Enter "Not Applicable" if NREAD assistance not required

