

1. PROGRAM MANAGEMENT

| | SATIS- FACTORY | UNSATIS- FACTORY |
|---|-------------------|---------------------|
| PERSONNEL APPOINTMENTS | | |
| 1. Are the unit's Hazardous Waste Manager and alternate appointed in writing? Para. 3.3a , Table 4.1 | _____ | _____ ✱ |
| 2. Are job titles, with the name of the person filling the job, available for each job related to regulated waste management? Para. 4.3 | _____ | _____ ✱ |
| TRAINING | | |
| 3. Have personnel handling regulated waste received formal USARAK training and yearly refresher training, and are the certificates for this training on file? Para 15.1 Table 15-1 | _____ | _____ ✱ |
| 4. Is there a record indicating when workers last received unit level training concerning the Hazard Communication Program and regulated waste management, including spill clean-up procedures? Para 3.4d , 15-1 Table 15-1 | _____ | _____ |
| HAZARDOUS MATERIAL/REGULATED WASTE SOP | | |
| 5. Does the unit/activity have a hazardous material/regulated waste SOP on file? Is the SOP current and being followed? Para 3.3k , 3.4f , 4.3 Table 4-1 | _____ | _____ ✱ |
| 6. Does the unit/activity have a diagram of the area(s) where hazardous materials and regulated waste are stored? Is this diagram current? Para 4.3 | _____ | _____ |
| INSPECTIONS | | |
| 7. Are inventories of hazardous materials recorded and up-to-date? Table 13-1 , 4-1 & Appendix B | _____ | _____ |
| 8. Are weekly regulated waste inspections conducted/documentated? Para. 3.4b , 3.4l , 911b Table 9-7 | _____ | _____ ✱ |
| 9. For containers holding regulated waste, are container logs maintained? Para. 3.4g , 3.5d , 9.11a , Table 4-1 , 9-7 and Appendix b | _____ | _____ ✱ |
| 10. Is stormwater run-on/run-off properly managed? Para 3.3c | _____ | _____ |
| SAFETY/WASTE DETERMINATIONS | | |
| 11. Does the unit/activity have current MSDSs on file for hazardous materials? Para 3.3i , 4.2 Table 4-1 | _____ | _____ |
| 12. Has the unit/activity properly determined whether its wastes are regulated as hazardous wastes? Chap 5 | _____ | _____ ✱ |

OTHER RECORD KEEPING REQUIREMENTS

**SATIS-
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- 13. Is a copy of the Commanding General's latest Environmental Management Memorandum on file in unit/activity Environmental Notebook? Chap. [17](#) Table [4-1](#)
- 14. Does the unit/activity have a current copy of the Pamphlet 200-1 on file? Para. [1.0](#) Table [4-1b](#)
- 15. Are all Directorate of Public Works, Environment Resources Office Bulletins on file in the unit/activity Environmental Notebook? Para [18.2](#) Table [4-1t](#)

Inspector's Comments:

2. HAZARDOUS MATERIALS MANAGEMENT

| THIS SECTION NOT APPLICABLE _____ | SATIS- FACTORY | UNSATIS- FACTORY |
|---|-------------------|---------------------|
| Building and location stored _____ | | |
| 1. Are new products segregated from in-use containers? | _____ | _____ |
| 2. Are new product shipping seals left in place until the product is needed? Para 10.1 | _____ | _____ |
| 3. MATERIAL COMPATIBILITY. Are the following not stored together: flammables with corrosives or oxidizers; poisons with corrosives; caustics with acids? Para. 7.0 Figure 7-1 | _____ | ★ _____ |
| 4. Are flammable materials stored in a flammable material locker? Para. 9.12c | _____ | _____ |
| 5. Are hazardous materials in operating areas kept to a minimum? Are hazardous materials containers closed when not in use? Para. 8.1c , 9.10g | _____ | _____ |
| 6. Are product containers serviceable? Are product containers labeled to identify the contents? Para 8.1a , 10.0 , 10.1 | _____ | _____ |
| 7. Is the material storage area(s) properly designated and marked? Para 9.7a | _____ | _____ |
| 8. Are containers that are stored outside covered in a manner to prevent them from becoming regulated waste ? | _____ | _____ |
| 9. Are spill response supplies readily available? Para 16.2 | _____ | _____ |
| 10. Are there procedures to ensure stock rotation on a "first-in/first-out" (FI/FO) basis? Para 3.3m , 3.7f , 6.1a | _____ | _____ |
| 11. Are unneeded, damaged, leaking, and excess hazardous materials and empty containers formerly holding hazardous material promptly and properly turned in? Para 5.12 , 8.1a | _____ | ★ _____ |
| 12. Are procedures in place for turn-in of excess hazardous material? Section 5 | _____ | _____ |
| 13. Is the product inventory up-to-date and accurate? Para 3.4k | _____ | _____ |

Inspector's Comments:

3. WASTE MANAGEMENT

| THIS SECTION NOT APPLICABLE _____ | SATIS- FACTORY | UNSATIS- FACTORY |
|--|-------------------|---------------------|
| WASTE CONTAINER REQUIREMENTS | | |
| 1. Are containers properly closed? Are bungs tightly closed (more than finger tight) after every use? Para. 8.1c , 9.10g | _____ | _____ |
| 2. Are any containers: leaking, rusted (more than surface), corroded, dented more than 2 inches? Do any containers have unserviceable filler caps/bung and/other sealing devices, any bulges, grooves other than removed metal, or dents in seams/corrugations? Are containers deteriorated in any other way? Para 8.1 | _____ | _____ |
| 3. Is container the appropriate material and construction for the waste it is holding? Para 8.1b , 8.2 | _____ | _____ |
| 4. Are containers not over-filled? (Liquids should be no more than 3 to 4 inches from the top of a 55-gallon drum, 1.5 to 2-inches from the top of a 5-gallon can, 1 inch from the top of a 1-gallon can. Soils/solids should fill no more than 3/4 of container.) Para 8.3b | _____ | _____ |
| CONTAINER MARKING | | |
| <i>Regulated Waste Only</i> | | |
| 5. For HWAAAs and EAAs, is accumulation start date marked on container(s) and storage time limits not exceeded? For SAAs, is start date put on when last drop is added to container, and the container is prepared for transport? Para 9.9 , Table 9-5 | _____ | _____ |
| 6. Are the words "Hazardous Waste" marked on container(s) holding hazardous waste? Para 10.2 | _____ | _____ |
| 7. Are containers of flammable hazardous waste properly marked with a flammable sticker? Para 10.2 | _____ | _____ |
| <i>Non-Hazardous Wastes Only</i> | | |
| 8. Are the words "Non-Hazardous Waste" marked on container(s) holding the non-hazardous waste? Para 10.2 | _____ | _____ |
| 9. Are containers of used oil marked "Used Oil" and "Non-Hazardous waste for Energy Recovery and Recycling" where applicable? Para 5.30 | _____ | _____ |
| 10. Are used oil drip pans, drain buckets and tank fill pipes marked "Used Oil"? Para 10.0 | _____ | _____ |
| <i>All Containers</i> | | |
| 11. Is container(s) information properly marked? Para 10.2 | _____ | _____ |
| 12. Are all other nonapplicable (old) labels painted out? Para 8.2 , Section 10 | _____ | _____ |
| 13. Are overpack containers labeled and marked correctly to reflect their contents? Section 10 | _____ | _____ |

| | SATIS-FACTORY | UNSATIS-FACTORY |
|---|---------------|-----------------|
| WASTE STORAGE AREA MANAGEMENT | | |
| 14. Can the waste storage area be differentiated from other shop activities? Para 9.2 , 9.6d , 9.7a | _____ | _____ |
| 15. Is the waste storage area free of severe structural deterioration? Para 9.6b | _____ | _____ |
| 16. Are there signs designating the area as a waste storage area posted on all visible sides? Do the signs correctly specify the type of waste storage area (e.g., SAA, HWSA, NHWSA, etc.)? Para 9.7 , Appendix A | _____ | ⊕ _____ |
| 17. Are signs stating "No Smoking Within 50 Feet" posted? Para 9.7 , Appendix A | _____ | ⊕ _____ |
| 18. At SAAs, are there no more than a total of 55 gallons of hazardous waste (or 1 quart of acutely hazardous waste) being stored? Para 9.4 , 9.8b | _____ | ⊕ _____ |
| 19. Are any vents for the waste storage area unobstructed? Para 9.10c | _____ | _____ |
| WASTE COMPATIBILITY | | |
| 20. Are the following not stored together: flammables with corrosives or oxidizers; poisons with corrosives; caustics with acids? Para 7.0 , Figure 7-1 | _____ | ⊕ _____ |
| 21. Are regulated wastes segregated from hazardous materials? Para 2.0 | _____ | _____ |
| 22. Are flammable wastes segregated from non-flammable wastes? Para 9.12d | _____ | _____ |
| 23. Does the storage area have adequate secondary containment capable of holding 110 percent of the liquid contents of the largest container? Para 9.7f | _____ | _____ |
| 24. Are drums that are stored outside covered in a manner to prevent accumulation or intrusion of rain and have secondary containment? | _____ | _____ |
| 25. Are drums positioned so labels can be easily read? Para 9.7g | _____ | _____ |
| 26. Are flammable drums properly grounded? Para 9.12j | _____ | _____ |
| 27. Is adequate aisle space (3 feet) present between drums to allow unobstructed movement for emergency response? Para 9.7g | _____ | ⊕ _____ |
| 28. Are container logs present for each barrel containing waste? Para 3.4g , 3.5d , 9.11a | _____ | ⊕ _____ |
| 29. Is the waste storage area clean and neat? Para 9.10i | _____ | _____ |
| 30. Are current personnel contacts posted at the storage area in case of an emergency? Para 9.7a , Appendix A | _____ | ⊕ _____ |

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EMERGENCY RESPONSE

- 31. Is the telephone easily accessible with emergency contacts posted in case of emergency? Is the telephone working? Para [9.7b](#) _____ ⊕ _____
- 32. Is there always a designated employee at the unit/activity or on call within a short distance of the unit/activity who has the responsibility for coordinating all emergency response measures? [Para 3.4h](#) _____ ⊕ _____
- 33. Does the unit commander/activity supervisor know what responses are required in cases of fire, explosion, spills, etc.? Para [3.3d](#) _____ _____
- 34. Is each hazardous material/regulated waste storage area marked on the Facility Site Plan? Para [4.3](#) _____ _____

SPILL CONTROL

- 35. Is an empty salvage drum nearby? Para [16.2](#) _____ _____
- 36. Are absorbent materials on hand appropriate to the wastes stored? Para [16.2](#) _____ ⊕ _____
- 37. Is all appropriate personal protective equipment (PPE) nearby?
 Gloves Boots Apron Goggles Respirator (if applicable) Para [16.2](#) _____ ⊕ _____

FIRE PROTECTION

- 38. Is a fire extinguisher readily accessible? Is the fire extinguisher fully charged? Para [9.7d, 9.10b, 9.12c](#) _____ ⊕ _____
- 39. Is the fire extinguisher seal intact and the monthly inspection tag completed? Para. [9.10b](#) _____ ⊕ _____

PERSONAL SAFETY

- 40. Is there an evacuation route from the storage area? Para. [4.3](#) _____ _____
- 41. Do personnel working with hazardous materials/regulated wastes know the locations of MSDSs and safety precautions for the materials/regulated wastes? Para. [3.3i, 4.2](#) _____ _____

Inspector's Comments:

5. MAINTENANCE BAYS

| THIS SECTION NOT APPLICABLE | SATIS-FACTORY | UNSATIS-FACTORY |
|--|---------------|-----------------|
| 1. Are the maintenance bay floors free of POL buildup? Para 3.3i | _____ | _____ |
| 2. Are containers for new and used dry sweep in place and properly marked? Para 5.10 , 5.11 , 10.0 | _____ | _____ |
| 3. Are all personnel aware of the proper procedures for disposing of contaminated dry sweep? Para 3.5d | _____ | ✱ _____ |
| 4. If parts washers are available, are lids secured when not in use? Para 6.1b , 8.1c | _____ | _____ |
| 5. Are dry sweep, rags, and other foreign matter kept out of parts washer? | _____ | _____ |
| 6. Are parts washers used for cleaning parts only? | _____ | _____ |
| 7. Are parts washing machines properly installed (i.e., hard-wired, vented, drains installed)? | _____ | _____ |
| 8. Are drip pans used? | _____ | _____ |
| 9. Are spills and leaks promptly and properly repaired and cleaned? | _____ | ✱ _____ |
| 10. Are workers using proper protective equipment (PPE) when required? Para 14.0 | _____ | _____ |
| 11. Is vehicle parking area free of oil spills/stained soils? Para 3.3i | _____ | _____ |
| 12. Are unsuitable materials, such as used oil, soap, and detergents, restricted from reaching oil/water separators, sand traps, and ditch drains? Para 3.3c , 9.2 & Table 9-1 | _____ | _____ |

Inspector's Comments:
