

HAZARDOUS WASTE MANAGEMENT PROCESS
HAZARDOUS WASTE STORAGE BUILDING (N48) HOURS ARE
Monday – Thursday 0800-1130 & 1245-1500

All communications to U.S Coast Guard (USCG) Base Kodiak Environmental shall be routed through the Government's project or construction representative. This will typically be the Contracting Officer Representative (COR) or another designated government representative.

Base Kodiak Environmental Division shall be contacted prior to any production of Hazardous or Regulated Waste. The Contractor will schedule a walk through inspection of the accumulation site for the government project representative and Base Environmental, prior to the site becoming operational. Once the site has government approval, the contractor may initiate its use.

Work shall meet or exceed all applicable requirements established by Federal, State and Local laws and regulations, as well as the Project site/Facility and the disposal facility. These requirements are amended frequently and the Contractor shall be responsible for complying with amendments as they become effective.

1. **Waste Accumulation:** The contractor is responsible for maintaining all their locations IAW 40CFR parts 239 thru 282 and USCG Base policies. All containers put into service shall be new or D.O.T. certified reconditioned and free of excessive corrosion and damage.
2. Containers holding liquid or aqueous solutions shall have secondary containment and shall not be filled past 80% of their capacity.
3. All containers shall be maintained in a closed status (Tool Tight) as defined by EPA regulation unless being actively used. Inspection logs and records will be maintained on site and available for inspection at all times.
4. Site must be under direct control of the contractor at all times.
5. All containers will be marked IAW EPA regulations.
6. Accumulation starts dates (where applicable) will be clearly marked on the container.
7. Hazard labels & hazard indicators will be clearly visible on the containers.
8. Multiple containers will be spaced as to allow easy access between rows and/or pallets.
9. Spill containment for liquids or semi-solids will be in place and of the correct sizing appropriate to the largest container.

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10. Spill kits will be readily available.

Shipping:

1. The contractor is responsible for all shipping of waste materials generated by the project they are awarded. The Contractor shall dispose of all incidental wastes generated during the performance of work authorized under Contract; The Contractor shall ensure that the shipping containers meet U.S. and State Department of Transportation (DOT) requirements; The Contractor shall be responsible for all operations associated with the shipping containers, such as moving, handling, weighing, etc.
2. USCG Base Kodiak is the “Generator” for D.O.T shipping manifests.
3. An authorized Base Kodiak Command representative must sign all manifests, after verifying they are correct. Contractors cannot sign on behalf of USCG.
4. All materials shall be shipped in compliance with federal and state regulations.
5. The Contractor shall package, mark, label, and placard shipping containers, and shall submit all required documents to USCG, including, but not limited to, Certificate of Disposal from the disposal facility and all shipment records.
6. Prior to shipping, copies of all lab analysis, Safety Data Sheets (SDS)’s, Waste Profile sheets, or other waste identifying materials shall be provided to Base Kodiak Environmental for review and record keeping. These shall be provided to, electronically, no later than 10 working days prior to the desired shipping date. The government will review all supporting documentation for waste profiling and approve or supply waste profiles (HWP) as needed. If used, Government provided HWP’s are for the one time use for a specific waste shipment. Under no circumstance shall a HWP be used for any other shipments.
7. Prior to shipping arrangement, the contractor will verify the government’s availability to sign the manifest as the generator. Notice to the government is required at five working days prior to the shipping date.

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8. The contractor will provide copies of all shipping documents to the government no later than five working days prior to the scheduled shipping date. These will be reviewed and any questions resolved prior to signing of the manifest(s).
9. For manifest signing, the contractor will have coordinated shipment, packaged and labelled all containers. The contractor is responsible for loading all materials for shipment. Thus, the government requires the contractor be the signatory as the first transporter on all documents. As such the representative signing will be currently certified IAW the most current DOT (49CFR) and EPA (40CFR) regulations.
10. All materials must stay onsite until approved for transfer and are ready to be loaded on the transport. Prior to loading, a Base Kodiak environmental protection specialist (EPS) is to insure the materials, containers and labeling are compliant with DOT and EPA regulation. Any discrepancies will be corrected and re-inspected prior to loading.
11. Once loaded, the shipping containers will be secured or sealed by the contractor until they are transported off site.
12. No containers of hazardous waste, hazardous materials, or any other project-generated waste are to be stored at N48 without pre-approval by the HWSB manager or the Base Environmental Division Chief.
13. On transfer day, the government contract representative and a Base Kodiak EPS will re-inspect the materials and compare to them to manifest.
14. If after 35 days the contractor has not provided the final shipping documents to the government, they shall contact the destination facility to determine the disposition of the shipment and its associated documents. The government project representative shall be included on all communications and provided any information on the same day as the information is received. The project representative shall provide that information to the Environmental Division the same day as they receive it.

* Base Kodiak Environmental Protection Specialists are available for any questions and want to help keep our customers and the Base within the guidelines of EPA regulation. Feel free to contact the division at any time via your Government site inspector or Project Manager. In the event of an emergency, call CGPD at 487-5555.

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We require consulting with our branch prior to the work commencing. Known hazardous waste streams and possible solutions can be discussed so that all are aware of any testing requirements or landfill restrictions prior to project start.

Common Violations of (RCRA), Subtitle C (Hazardous Waste):

1. Failure to properly sample and/or test hazardous waste or apply user knowledge of waste in order to comply with Subpart C: waste determinations.
2. Failure to close hazardous waste containers not currently in use. Absence of hazardous waste labels on containers, or mislabeled containers.
3. Hazardous waste signs and emergency numbers not posted at hazardous waste storage areas.
4. Satellite accumulation areas with more than 55-gallon storage capacity.
5. Incompatible waste materials/wastes stored next to each other as well as drums that lack secondary containment per state requirements.
6. Lack or incomplete inspection of the weekly logs at the hazardous waste storage areas per state & federal requirements.
7. Hazardous materials illegally disposed of (trash cans and dumpsters).

Any violations of regulation or USCG policy will be reported directly to the Contracting Officer.