

ENVIRONMENTAL INTERNAL COMPLIANCE AUDIT PROTOCOL

Defense Logistics Agency Strategic Materials

This audit covers depot specific elements as well as elements of the organizational Environmental, Safety, and Occupational Health Management System.

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Environmental Internal Compliance Audit Protocol Summary

Protocol	Environmental Compliance	Findings		Recommendation	
		Adverse	Favorable	Yes	No
1	Air Emissions (United States Code [USC] Title 42, Chapter 85)				
2	Cultural Resources (Department of Defense [DoD] Instruction 4715.3, Environmental Conservation Program [May 1996], and More Than 22 Laws, Regulations, and Guidance)				
3	Hazardous Materials (40 <i>Code of Federal Regulations</i> [CFR] 350–399, 29 CFR, and 49 CFR)				
4	Hazardous (40 CFR 260–272) and Universal (40 CFR 273) Wastes				
5	Natural Resource Management (DoD Instruction 4715.3, Environmental Conservation Program [May 1996], and More Than 26 laws)				
6	Other: National Environmental Policy Act (NEPA) (40 CFR 1501–1508), Installation Restoration Program (IRP) (40 CFR 300), Pollution Prevention (P2) (Energy Security and Independence Act [ESIA]; 7 CFR 2902, 10 CFR 436, 40 CFR 247, 48 CFR, Energy Policy Act [EPACT] of 2005)				
7	Pesticides (40 CFR 150–189)				
8	Petroleum, Oil, and Lubricant Management (40 CFR 110, 40 CFR 112, 40 CFR 279, 49 CFR 130)				
9	Solid Waste (40 CFR 243)				
10	Aboveground Storage Tanks (ASTs) (29 CFR 1910, 40 CFR 60, 40 CFR 63, 40 CFR 112, 40 CFR 279)				
11	Toxic Substance (40 CFR 700–766)				
12	Water Discharges (40 CFR 125–136)				
13	Drinking Water (40 CFR 141–143)				

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ENVIRONMENTAL COMPLIANCE

PROTOCOL 1: Air Emissions

Clean Air Act (USC Title 42, Chapter 85)

The Clean Air Act includes regulations, responsibilities, and compliance requirements associated with air pollution emissions from stationary and mobile sources. The significant types and sources of air pollution emissions include the following:

- Particulates, sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and hazardous air pollutants from fuel burning at steam and hot water generation plants and boilers
 - Particulates and toxic air emissions from the operation of hazardous waste, general waste, classified material, and medical, pathological, or infectious waste incinerators
 - Air pollutant emissions from open burning and open detonation operations
 - VOC vapors from the operation of degreasers and other processes that use solvents
 - The emission of CO from vehicles and equipment
 - Fugitive particulate emissions from training activities and construction and demolition operations
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PROBE QUESTIONS

1. Is the depot in a nonattainment area? (Note: A nonattainment area is an area that does not meet the national primary or secondary ambient air quality standard established by the U.S. Environmental Protection Agency [USEPA] for designated pollutants, such as CO and ozone. For DLA Strategic Materials, the Hammond Depot is a nonattainment area. The Scotia and Warren Depots are not nonattainment areas.)
2. What type or air emission sources does the depot have (furnaces, boilers, etc.)?
3. Is the depot a major or a synthetic minor source for criteria pollutants (ozone, CO, NO_x, sulfur oxides, particulate matter)?
4. Does the depot need or have any other federal or state air operating permits? If so, is the depot following all of the conditions of the permit?

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PROTOCOL 1: Air Emissions

5. Does the depot use ozone depleting substance (ODS) containing equipment? Is an inventory maintained? A list of ODSs is provided on the USEPA website:
<http://www.epa.gov/ozone/science/ods/index.html>

6. Does any the equipment contain over 50 pounds of ODSs? If yes, are leak rates checked as needed?

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PROTOCOL 2: Cultural Resources

Cultural Resources

Historic and archeological resources at federal facilities are regulated by **DoD Instruction 4715.3, Environmental Conservation Program (May 1996), and more than 22 other laws, regulations, and guidance**. The ultimate goal is to preserve sites that have historic and cultural importance to our society while simultaneously being able to conduct government activities important to today's economy.

PROBE QUESTIONS

1. Has there been a cultural resource assessment conducted?
2. If yes, where is this documented?
3. Are you aware of any cultural resources on depot grounds?
4. If yes, do you have a plan for preservation and protection of the resource?

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PROTOCOL 3: Hazardous Materials

Emergency Planning Community Right to Know (40 CFR 350–399), Occupational Safety and Health Act (29 CFR), and Hazardous Materials Transportation Act (49 CFR)

This section addresses the proper storage and handling of chemicals and the training, reporting, spill contingency, and response requirements related to hazardous materials.

PROBE QUESTIONS

Emergency Planning and Community Right-to-Know Act (EPCRA) Section 301— Emergency Planning

1. Does the depot have a designated person to work with local emergency personnel?
2. Have copies of material safety data sheets (MSDSs) been submitted to the State Emergency Response Commission (SERC), local emergency planning committees (LEPC), and fire department?

EPCRA Section 304—Emergency Release Notification

3. Have there been releases of hazardous materials in amounts greater than the “reportable quantity”? If so, were the SERC and LEPC notified?
4. Were the proper follow-up notifications submitted?

EPCRA Section 311–312—Tier II

5. Are Tier II reports being submitted annually to the SERC, LEPC, and fire department? Are there records stating that these organizations have received the reports? Is the depot keeping the reports on file?
6. Are Tier II reports complete? If the depot is submitting reports using TIER II Submit, all required information is included.

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PROTOCOL 3: Hazardous Materials

EPCRA Section 313—Toxic Release Inventory (TRI)

7. Is the depot required to submit TRI reports? If yes, have the TRI reports been submitted annually by July 1?
8. Does the depot maintain supporting documentation for TRI reports?
9. Do the TRI reports include all the required information? If the depot is submitting the TRI report using TRI-MEweb, all required information is included.

U.S. Occupational Safety and Health Administration (OSHA) Hazardous Communication Requirements (29 CFR 1910.1200)

10. Are all containers of chemicals labeled?
11. Are areas of hazardous material storage neat and clear of hazards from tripping, fire, explosion, or pest harborage?
12. Are personnel working with hazardous materials trained?
13. Are flammable and combustible materials stored in appropriate cabinets?
14. Does the depot have MSDSs for every chemical/mixture stored and used onsite?
15. Are MSDSs readily available for all chemicals and accessible by all employees?

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PROTOCOL 4: Hazardous and Universal Wastes

Hazardous Wastes (40 CFR 260–272)

The Resource Conservation and Recovery Act (RCRA) addresses nonhazardous and hazardous waste management activities.

Regulations promulgated under RCRA (40 CFR 260 through 299) establish a “cradle-to-grave” system governing hazardous waste from the point of generation to disposal. RCRA hazardous wastes include the specific materials listed in the regulations (commercial chemical products designated with the code “P” or “U,” hazardous wastes from specific industries/sources designated with the code “K,” or hazardous wastes from non-specific sources designated with the code “F”) or materials that exhibit a hazardous waste characteristic (ignitability, corrosivity, reactivity, or toxicity and designated with the code “D”).

Regulated entities that generate hazardous waste are subject to waste accumulation, manifesting, and recordkeeping standards. Facilities generally must obtain a permit either from the USEPA or from a state agency that the USEPA has authorized to implement the permitting program if they store hazardous wastes for more than 90 days before treatment or disposal. Facilities may operate less-than-90-day tanks or containers of hazardous wastes without a permit. RCRA permits contain general depot standards, such as contingency plans, emergency procedures, recordkeeping and reporting requirements, financial assurance mechanisms, and unit-specific standards.

Many operations and organizations may have numerous operations that result in the generation and management of different types of solid and hazardous waste. These operations may be subject to specific parts of RCRA, depending on the type of waste generated, its management (for example, stored, transported), and its disposal. Most RCRA requirements are not industry specific but apply to any entity that generates, transports, treats, stores, or disposes of hazardous waste.

Defense Logistics Agency (DLA) Strategic Materials depots are usually conditionally exempt small-quantity generators (CESQG). That is, they generate less than 100 kilograms of hazardous waste a month.

HAZARDOUS WASTE PROBE QUESTIONS

1. Does the depot generate hazardous waste? Note: DLA Strategic Materials facilities are CESQG.
 2. What hazardous wastes are generated at the depot?
 3. What is the quantity of hazardous waste generated annually?
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PROTOCOL 4: Hazardous and Universal Wastes

4. Is the depot permitted for treatment, storage, or disposal of hazardous waste?

5. Are packages and containers of hazardous waste ready for shipment labeled in accordance with DOT regulations?

6. What Defense Reutilization and Marketing Office (DRMO) or company is used for disposal?

7. Does the Treatment, Storage, and Disposal Facility (TSDF) that receives waste have a USEPA ID number?

8. Are hazardous waste drums in good condition, not leaking, closed at all times except when placing or removing waste from drum, and labeled with the words “Hazardous Waste”?

9. Are containers used to store hazardous waste compatible with the type of waste?

10. Are analytical records and waste determination records maintained onsite for a period of 3 years and available for each waste?

11. Does the depot have at least one emergency coordinator on site or on call?

12. Are the name and number of the emergency coordinator, location of fire extinguishers and spill equipment, location of any fire alarms, and number to the fire department posted near the phone?

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PROTOCOL 4: Hazardous and Universal Wastes

13. Is the amount of waste generated less than 100 kilograms per month (220 pounds) with no more than 1,000 kilograms stored at any time? If yes, see additional audit questions in Appendix A.

Used Oil Generation

1. Does the depot generate used oil?
2. Are all used oil containers in good condition, with no visible leaks, and labeled "Used Oil"?
3. Is the used oil recycled at a USEPA-approved used oil recycler?

Spills of Hazardous Wastes

14. Have there been spills of hazardous wastes?
15. Was each spill reported, documented, and cleaned up?
16. If the amount of the spill exceeded the reportable quantity amount, was the National Response Center (NRC) notified?

Training

17. Has hazardous waste training been given to personnel who manage hazardous waste?
18. Is refresher training provided every year for these employees?

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PROTOCOL 4: Hazardous and Universal Wastes

19. Is the training documented?

NOTE: If the depot exceeds the limits in question 13, the additional requirements in Appendix A apply.

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PROTOCOL 4: Hazardous and Universal Wastes

Universal Waste (40 CFR 273)

Universal wastes are defined in 40 CFR 273 as batteries, fluorescent light bulbs, mercury-containing equipment, and pesticides. Universal wastes are considered hazardous wastes but have fewer requirements than other hazardous wastes due to the common nature of the items.

UNIVERSAL WASTE PROBE QUESTIONS

1. Does the depot store universal waste onsite?

2. Does the depot store more than 5,000 kilograms of universal waste at any one time? If so, has the depot notified the USEPA and followed other requirements for a large-quantity handler of universal waste?

3. Is universal waste disposed of within 1 year of generation? Is this documented?

4. Does the depot dispose of, treat, or dilute universal waste onsite?

5. Are releases of universal waste immediately contained?

6. Are employees trained in handling universal waste?

7. Batteries:
 - a. If depot stores waste batteries, are the batteries in good condition, with no visible leaks?

 - b. Are batteries that show visible leaks placed in a container to contain the leak?

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PROTOCOL 4: Hazardous and Universal Wastes

- c. If the depot removes the electrolyte from the batteries or generates any other solid waste from the batteries, is the solid waste characterized before disposal to determine if waste is hazardous?
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8. Pesticides: Note that pesticide use is prohibited in DLA Strategic Materials depots.
 - a. If the depot stores waste pesticides, are the pesticides stored in a closed container that is structurally sound and compatible with the container?

 - b. Are any pesticide containers that are leaking placed in overpack drums?

 - c. Are containers labeled with the words “Universal Waste-Pesticides” or “Waste Pesticides”?

 9. Mercury-containing equipment:
 - a. Is mercury-containing equipment with any noncontained elemental mercury, or that shows any evidence of damage or leaking, placed in a closed, structurally sound, compatible container?

 - b. Are containers labeled with the words “Universal Waste—Mercury-Containing Equipment,” “Waste Mercury-Containing Equipment,” or “Used Mercury-Containing Equipment”?

 10. Fluorescent light bulbs:
 - a. Are fluorescent light bulbs stored in closed containers to minimize potential for breakage?

 - b. Are containers labeled with the words “Universal Waste—Lamps,” “Waste Lamps,” or “Used Lamps”?

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PROTOCOL 5: Natural Resource Management

Natural Resource Management

Natural resources, such as threatened and endangered species, and wetlands at federal facilities are regulated by **DoD Instruction 4715.3, Environmental Conservation Program, and more than 26 laws**. The ultimate goal is to preserve sites that have significant natural resources while simultaneously being able to conduct government activities important to today's economy.

PROBE QUESTIONS

1. Is the depot required to have an Integrated Natural Resource Management Plan (INRMP)?
2. If so, are the goals of the INRMP being met or is progress being made toward the goals?
3. Has the INRMP been reviewed in the past 5 years?
4. Was the INRMP prepared in coordination with the U.S. Fish and Wildlife Services?
5. Does the depot prohibit the tampering of threatened and endangered species?
6. Is training on natural resources management issues given to employees, tenants, and contractors?
7. Are there any endangered or threatened species at the depot? If so, do you have a list of the endangered or threatened species?
8. Have Environmental Impact Studies (EISs) that meet NEPA requirements been conducted for new construction activities?

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PROTOCOL 6: Other (NEPA, IRP, P2)

Other

This section addresses the following issues:

1. NEPA process (**40 CFR 1501–1508**)
 2. IRP (**40 CFR 300**)
 3. P2 (**ESIA, 7 CFR 2902, 10 CFR 436, 40 CFR 247, 48 CFR, EPACK of 2005**)
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PROBE QUESTIONS

NEPA

1. Is the NEPA process routinely part of new project development? Are potentially environmentally significant issues identified?
2. Are Environmental Assessments (EAs) and EISs developed when needed? Are alternative actions identified?
3. If there is only an EA, has there been a documented Finding of No Significant Impact (FONSI)?
4. For EISs, are notices of intent published and the public involved?

IRP

5. Does the depot have a contaminated site that might need to undergo Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) response actions?
6. Has there been a remedial site evaluation? If yes, have follow-up actions occurred in accordance with the findings of the remedial site evaluation?

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PROTOCOL 6: Other (NEPA, IRP, P2)

7. Has there been a remedial investigation/feasibility study?

8. Have appropriate engineering and institutional controls (such as land use controls) been implemented to prevent or limit exposure to hazardous substances, pollutants, or contaminants?

9. Is waste generated from the cleanup handled appropriately?

10. Is the Administrative Record complete and up to date?

11. Is the community involved in any remedial investigations?

Pollution Prevention

12. Does the depot have a green procurement program?

13. Are contracts written so as to encourage P2 and green procurement?

14. Are alternative fuels used where feasible?

15. Is purchased electronic equipment Energy Star-rated (or Energy Star-equivalent)?

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PROTOCOL 7: Pesticides

Herbicides and Pesticides (40 CFR 150–189)

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) regulates the sale, distribution, and use of pesticides. Pesticides include insecticides, herbicides, fungicides, rodenticides, and antimicrobials.

PROBE QUESTIONS

1. Does the depot use pesticides or restricted-use pesticides? Note: Pesticides are strictly prohibited at DLA Strategic Materials depots.
2. Are all pesticides labeled?
3. Are personnel who apply restricted-use pesticides certified? Is it documented? (If pesticide application is contracted, contract personnel must show certification.)
4. If noncertified personnel apply pesticides, are they directly supervised by a certified applicator?
5. Are records kept of the amount of pesticides applied and pests targeted? Are records kept for at least 3 years?
6. Are waste pesticides properly disposed of in accordance with the universal waste regulations?

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PROTOCOL 8: Petroleum, Oil, and Lubricant Management

Petroleum, Oil, and Lubricant Management

The storage, transport, disposal, or use of petroleum-based fuels, oils, or lubricants (POL) is regulated by **40 CFR 110, 40 CFR 112, 40 CFR 279, and 49 CFR 130**. Facilities conducting these activities should have procedures and organizational mechanisms designed to prevent or limit the accidental release of POL materials to surface water, groundwater, or soils. Spill Prevention Plans, POL transfer operations, and POL storage in containers other than tanks are addressed here. Storage tanks are addressed in Protocol 10.

PROBE QUESTIONS

1. Does the depot have a Spill Prevention, Control, or Countermeasures (SPCC) Plan or Integrated Contingency Plan?
2. If so, are all requirements and best management practices of the depot's SPCC Plan being followed?
3. Does the SPCC Plan list the integrity testing requirements?
4. Has integrity testing been conducted as required?
5. Are required inspections conducted and documented?
6. Is the SPCC Plan certified by a professional engineer?
7. Have any new POL containers (55 gallons or above) been added to the SPCC Plan within the past 6 months?
8. Have any amendments made to the SPCC Plan been certified by a professional engineer?

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PROTOCOL 9: Solid Waste

Solid Waste (40 CFR 243)

Solid waste is considered to be nonhazardous trash, rubbish, garbage, bulky wastes, liquids, or sludges generated by any operations and activities. This section addresses the collection, storage, and disposal of solid waste at facilities.

PROBE QUESTIONS

1. Are solid waste collection areas clean, neat, and safe for employees?
2. Are solid wastes and recyclables removed at regular frequency?
3. Does the depot recycle?
4. Were any wastes diverted?
5. Are all solid wastes sent offsite for disposal?
6. Are adequate records maintained?

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PROTOCOL 10: Aboveground Storage Tanks

Aboveground Storage Tanks

The storage of chemicals and materials in ASTs is regulated at the federal level via **29 CFR 1910, 40 CFR 60, 40 CFR 63, 40 CFR 112, and 40 CFR 279**. Often states have additional regulations. In the case of the three DLA Strategic Materials depots (Hammond, IN; Warren, OH; and Scotia, NY), only New York has state-specific regulations for ASTs. If auditing Scotia, please see Appendix B for these requirements.

PROBE QUESTIONS

1. Are ASTs in good condition?
2. Has integrity testing been conducted on ASTs that require it?
3. Are required inspections conducted and documented?
4. Are ASTs included in the depot's SPCC Plan?
5. Are ASTs double-walled?
6. Are single-walled ASTs within secondary containment?
7. Are secondary containments in good condition?
8. Have there been discharges in the past year from an AST? If so, were the proper notifications made?

NOTE: At Scotia, the additional requirements in Appendix B apply.

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PROTOCOL 11: Toxic Substances

Toxic Substance Control Act (40 CFR 700–766)

This section is used to determine the compliance status of the management activities associated with polychlorinated biphenyls (PCBs), asbestos, radon, and lead-based paint.

PROBE QUESTIONS

1. Are there any PCBs on the depot? If so, how much and at what concentration?
2. If transformers or other equipment have PCB-containing fluid, are they marked and serviced appropriately?
3. Is the depot working to become PCB-free?
4. Is there any asbestos at the depot? If yes, is there an inventory?
5. Are there renovations or other construction projects planned for the areas with asbestos? If yes, are proper precautions and notifications occurring?
6. Has the depot done any radon testing?
7. Are there any lead-based paints at the depot? If yes, is there an inventory?
8. Are there renovations or other construction projects planned for the areas with lead-based paint? If yes, are proper precautions and notifications occurring?

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PROTOCOL 12: Water Discharges

Clean Water Act (40 CFR 125–136)

The Clean Water Act (CWA) governs the control of water pollution in the nation. The act's primary objective is to restore and maintain the chemical, physical, and biological integrity of the nation's surface waters. The CWA made it unlawful to discharge any pollutant from a point source into navigable waters, unless a permit was obtained. The USEPA's National Pollutant Discharge Elimination System (NPDES) permit program controls discharges of wastewater and stormwater. Many facilities qualify for Multi-Sector General Permits (MSGPs) for their stormwater discharges.

PROBE QUESTIONS

1. What is the type of sewer system (public or septic)?
2. Is there any backflow prevention in these systems?
3. Does the depot have an individual NPDES permit for wastewater or stormwater discharge?
4. Have any discharge permit violations occurred?
5. Have any corrective actions occurred?

Stormwater Management

6. Is the stormwater system separate? Where does it discharge?
7. Does the depot discharge stormwater under an MSGP?
8. Are permit requirements—such as monitoring/sampling, recordkeeping, and reporting—being followed, and is there documentation that they are being met? When do the permits expire?

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PROTOCOL 12: Water Discharges

9. Does the depot have a Stormwater Pollution Prevention Plan?

10. How are samples collected, and who performs the analyses?

11. Where are the records kept?

12. Who reviews these records?

13. Are the best management practices outlined in the Stormwater Pollution Prevention Plan being implemented and regularly inspected?

14. Are annual inspections being conducted?

15. Has initial training been conducted for new employees?

16. Is annual refresher training being conducted?

17. Are training records maintained?

18. Are records required in the Stormwater Pollution Prevention Plan being maintained?

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PROTOCOL 12: Water Discharges

Construction Activities

19. Are any construction activities occurring at the depot? If so, has the depot obtained a stormwater construction permit for the activity and implemented the best management practices?

20. If any construction projects have been recently completed, has the Notice of Termination been submitted for the stormwater permit?

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PROTOCOL 13: Drinking Water

Safe Drinking Water (40 CFR 141–143)

The Safe Drinking Water Act identifies and regulates facilities that have a public water supply system. A public water system is defined as a system for providing piped water for human consumption. To qualify, the system must have at least 15 service connections or an average of 25 individuals for at least 60 days out of the year.

PROBE QUESTIONS

1. What is the source? Is water quality tested periodically? If yes, by whom?
2. What parameters are measured?
3. Are records maintained?
4. How are out-of-compliance events reported?
5. Has lead been tested in water fountains?
6. Are depot personnel aware of drinking water quality and testing?

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Appendix A

For Small-Quantity Generators of Hazardous Waste

1. Does the depot have a USEPA ID number?
2. Are hazardous waste drums in good condition, not leaking, closed at all times except when placing or removing waste from drum, and labeled with the words “Hazardous Waste”?
3. Are containers used to store hazardous waste compatible with the type of waste?
4. Are analytical records and waste determination records maintained onsite for a period of 3 years and available for each waste?
5. Does the depot have at least one emergency coordinator on site or on call?
6. Are the name and number of the emergency coordinator, location of fire extinguishers and spill equipment, location of any fire alarms, and number to the fire department posted near the phone?

Satellite Accumulation Areas

7. Are satellite accumulation areas at or near the point of generation, within control of the operator, containing less than 55 gallons of waste stored at each accumulation point, and labeled with the words “Hazardous Waste”?
8. When the satellite accumulation reaches 55 gallons of waste, is the drum labeled with the date and moved to a 90-day storage area or offsite within 3 days?

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9. Are satellite accumulation areas inspected weekly and inspections documented?

Manifests

10. Are manifests from hazardous waste shipments kept on file for a period of 3 years?
11. Has the depot received a signed copy of all manifests from the owner of the TSDF within 60 days (for small-quantity generator) or 45 days (for large-quantity generator)? If not, has the depot submitted a written notification to the USEPA that they have not received a signed copy of the manifest?
12. Has the depot submitted a biennial report to the State by March 1 of every even-numbered year?

Spills of Hazardous Wastes

13. Have there been spills of hazardous wastes?
14. Was each spill reported, documented, and cleaned up?
15. If the amount of the spill exceeded the reportable quantity amount, was the NRC notified?

Training

16. Has hazardous waste training been given to personnel who manage hazardous waste?
17. Is refresher training provided every year for these employees?
18. Is the training documented?

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19. Does the depot document the following?
- Job title for each position at the depot related to waste management
 - Name of the employee filling each job
 - Written job description for each position
 - Written description of the type and amount of both introductory and continuing training to be given to each person filling a position
 - Records that document the training or job experience required has been given to and completed by each person

For Large-Quantity Generators of Hazardous Waste, the additional requirements apply:

20. Does the depot have a Hazardous Waste Contingency Plan or an Integrated Contingency Plan?
21. For drums stored in 90-day storage areas, has the accumulation start time been listed on the label, are the drums in good condition, and have they been onsite for fewer than 90 days?
22. Are storage areas for hazardous waste designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste?

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Appendix B

For ASTs in Scotia, New York (New York Department of Environmental Conservation [NYDEC] Regulations, Ch.V, Part 596 and Part 598 Hazardous Substance Bulk Storage Regulations)

This part applies to storage facilities located in the state of New York that have one or more ASTs storing a hazardous substance, or mixture thereof, with a capacity of 185 gallons.

1. Have out-of-service storage tanks that have not been permanently closed been registered with the NYDEC?
2. Are tank registrations renewed every 2 years?
3. Are all ASTs registered together using the NYDEC application form? Have the fees been paid?
4. Was the application form signed by either a principal executive official or other duly authorized employee?
5. Were new ASTs registered with the NYDEC 3 business days prior to installation, unless installed on an emergency basis?
6. Are records of changes in types of hazardous substances stored in ASTs maintained and provided to the state when registration is renewed every 2 years?
7. If the storage facility has been substantially modified, was the NYDEC notified 3 days in advance? Did the notification include the dates substantial modification would begin and end?
8. Does the depot conspicuously display the NYDEC registration certificates?

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9. Are the registered ASTs clearly marked or labeled with the tank ID number, chemical name or common name, total capacity and working capacity of tank, and warning signs?

10. In the event of a release, were immediate actions taken to protect human health, safety, and environment? Were there follow-up actions to determine the quantity of the release or spill, extent of contamination, and threat to public health, safety, and the environment?

11. Were the results of the investigation submitted to the NYDEC within 14 days of the release or spill? Did the NYDEC require additional actions? If so, were these actions completed?

12. Is secondary containment provided at transfer stations?

13. Are spill prevention kits provided at AST pumps and valves?

14. How often are the ASTs inspected? What information is included in the inspection reports?

15. If an inspection indicates that continuation of an operation or practice will result in release or that the AST is inadequate, was the operation or practice modified or discontinued? Was the AST replaced, repaired, or taken out of service?

16. Are exposed exterior surfaces of all ASTs, piping, and ancillary equipment protected from corrosion?

17. Are rupture disks replaced at least every 3 years or as recommended by the disk manufacturer?

18. Is vegetation growing within secondary containment systems?

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19. Is repaired equipment inspected for tightness and sound before it is returned to service?

20. Does a qualified engineer evaluate an AST system if the contents are switched?

21. If the depot has any out-of-service or closed tanks, have the proper notifications been made to the NYDEC?

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