



# CONTRACTOR'S GUIDE TO ENVIRONMENTAL COMPLIANCE



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## **ABOUT THIS GUIDE**



The ***Contractor's Guide to Environmental Compliance*** at NAVSEA Division Keyport, herein referred to as Keyport or the 'Base', is designed to meet the environmental information needs of contractors working at the facility. The information provided in this guide offers the level of detail needed to comply with key environmental regulations. This knowledge will help you develop and maintain an efficient and effective environmental plan for the performance of your task.

Compliance with all applicable Federal, State, local, and Keyport environmental requirements is mandatory. In emergency situations when the Contracting Officer is not available, call Keyport's designated points of contact using the telephone numbers provided on the next page. These individuals may provide information and guidance, but are not authorized to provide direction to contractors. Only the Contracting Officer is authorized to make final determinations on appropriate actions.

**Note:** *This document is provided for general awareness only. It remains the contractor's duty to comply with all applicable laws, and this guide alone cannot assure such compliance. To the extent the requirements of this document are in conflict with the contract specifications, the contract specifications control. If the contractor believes this guidance conflicts with the specifications, the issue should be discussed with the Contracting Officer.*

Acknowledgement: NUWC *Keyport* recognizes and appreciates the help provided by Contractor Guides developed by the Puget Sound Naval Shipyard in preparing this document.

# **TELEPHONE LISTING**



## **EMERGENCIES** (Medical Assistance, Fire, Flooding, Emergency Spill Response, etc.):

When using a non-Keypoint (personal) telephone/mobile ..... (360) 396-4444  
When using a Keypoint (government) telephone ..... 911

## **CONTRACTING OFFICES**

NAVFAC NW Silverdale Field Office ..... (360) 396-6844  
Facilities Support Division (Code 173) ..... (360) 396-2358

## **ENVIRONMENTAL DIRECTOR**

Carl Haselman ..... (360) 396-5430

## **ENVIRONMENTAL POINT OF CONTACT**

Air Discharges and Ozone Depleting Substances (Mark Halvorsen) ..... (360) 396-5878  
Asbestos Management (James Tanksley) ..... (360) 315-3854  
Environmental Law Compliance (Fabio D'Angelo) ..... (360) 396-5682  
Hazardous Material Management (Bob Myers) ..... (360) 396-5438  
Dangerous Waste Management (Dale Hunt) ..... (360) 396-2320  
ISO 14000 Environmental Management System (Mark Halvorsen) ..... (360) 396-5878  
Installation Restoration (Superfund Sites) (Douglas Thelin) ..... (360) 396-0206  
Solid Waste Management ..... (360) 396-7005  
Emergency Response Planning (Reinout van Beynum) ..... (360) 396-5435  
Stormwater (Mark Halvorsen) ..... (360) 396-5878  
Water Quality, Sewer/Wastewater Discharge (Reinout van Beynum) ..... (360) 396-5435

## **ENVIRONMENTAL SERVICES:**

Waste Designation (Chris Stull) ..... (360) 396-7991  
Dangerous Waste Pick Up (Dale Hunt) ..... (360) 396-2320

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# INTRODUCTION



The Navy is committed to operating in a manner compatible with the environment and in compliance with environmental regulations. Consequently, an important part of Keyport's mission is to prevent pollution and protect the environment. Keyport's Environmental Policy fulfills this vision and mission and you (as a company under contract with the Navy) must provide a personal commitment to environmental protection.

## ENVIRONMENTAL POLICY

It is the Environmental Policy of the Naval Undersea Warfare Center Division, Keyport that we are committed to:

- *Conducting business in an environmentally responsible manner that promotes pollution prevention, resource conservation, and environmental stewardship.*
- *Operating our processes in compliance with applicable legal requirements and with other requirements that relate to our environmental aspects.*
- *Continually improving our workplace to reduce environmental risk.*
- *Developing annual targets to serve as guidance for planning and operations.*
- *Ensuring this policy is communicated to all persons working for or on our behalf and is available to the public.*

This commitment is important regardless of whether your job is large or small. Whether you are involved in a major construction project or a small paint job, it is mandatory to consider the environment in all of your operations. Your awareness and participation are vital to the success of our Environmental Management System (EMS) and our ability to comply with the various environmental laws. To support our EMS, you should be knowledgeable of:

- ◆ Keyport's Environmental Policy,
- ◆ Potential environmental impacts/aspects associated with your work, and
- ◆ Emergency response procedures.

Environmental regulations have increased exponentially in recent years and Keyport now operates under separate permits for air emissions, wastewater/sewer, stormwater, and Dangerous Waste disposal. Specific to dangerous waste, Keyport operates as a fully-regulated, large quantity generator. Compliance with environmental regulations requires specialized knowledge and expertise. Keyport's environmental staff will provide you, upon request and through this guide, with information that will help you understand your responsibilities towards environmental compliance.

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# WHAT IS ENVIRONMENTAL COMPLIANCE

## Compliance



**“Environmental Compliance”** means conforming to the many environmental regulations and Keyport requirements. These rules can vary with the different regulated media (e.g., air, water, waste) depending on your project status. For example, your project could be in compliance with water quality regulations but out of compliance with dangerous waste regulations. In order for you to comply with the rules, you must have a solid understanding of the local, State and Federal regulations and the requirements of Keyport’s Environmental Programs.

## Why Compliance is Important

Environmental compliance, although it may be more costly initially, is a responsibility you must plan for and accept as a cost of doing business with Keyport and the Navy. Non-compliance is far more costly in the long run, not only in dollars, but also in bad publicity that can affect relations with the community and your ability to obtain future Federal contracts. Conversely, following proper environmental procedures also benefits your project by preventing time delays or operational shutdowns and improves public relations. To this end, you must always include environmental compliance in your policies, procedures, and operations.

## Compliance Guidelines

If you are involved in a large project such as construction, environmental controls will be specified in your contract. Your contract should include Sections 01 57 19.01 20 and 01 57 19.01 24, TEMPORARY and SUPPLEMENTAL ENVIRONMENTAL CONTROLS For NBK Keyport. They specify several environmental compliance obligations or limited requirements (hazardous material, dangerous waste, air pollution, etc.). If not included with the contract, a copy of these Sections can be obtained from your Contracting Officer upon request.

Your contract will specify if you will be required to submit a formal *Environmental Protection Plan* to the Contracting Officer for review and comment. Guidelines for this plan are contained in Sections 01 57 19.01 20 and 01 57 19.01 24 of the contract specifications. If this requirement is not specified in your contract, you will still be required to meet with members of the Environmental Office prior to starting your job to determine the job requirements and if such a plan is needed. Information about contacting the Keyport Environmental Program Managers is contained in the list on page ii of this guide.

If a plan is required, you will be provided with any guidance that you require. If a plan is not required, you will still be expected to comply with this guide and any additional instructions provided to you by Keyport Environmental Managers.

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# HAZARDOUS MATERIAL MANAGEMENT

## What is Hazardous Material Management?



**“Hazardous Material”** is defined as any material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment.

The procurement, storage, use, and minimization of hazardous materials at Keyport require stringent control measures to protect the user and environment from potential or actual hazards. All hazardous materials must be approved by the Keyport Hazardous Material Program Manager prior to being brought on Base.

## How Do I Comply?

All hazardous material brought on Base must be reported to the Keyport Hazardous Material Program Manager and specified in your *Environmental Protection Plan*. Before any material is stored or used to perform a task, the contractor must contact the Hazardous Material Program Manager identified in the list on page ii. If you are unable to reach the Hazardous Material Program Manager at this number, leave a message or call (360) 396-7090.



Contractors shall provide a *Material Safety Data Sheet* (MSDS) for each material at least 10 working days before the material arrives and the quantity (to include type and size of containers) that will be brought on Base, where and how it will be used, and how many days it will be on Base. Hazardous materials include, but are not limited to, hazardous gases, liquids, powders, or solids, such as acids, alkalis, bases, caustics, cleaners, coatings, coolants, corrosives, cryogenics, degreasers, finishes, epoxies, flammables, fluxes, inks, lubricants, oils, paints, sealants, solders, solvents, strippers, toners, thinners, varnishes, and waxes.

The Hazardous Material Program Manager will record the information and, if it is determined we are permitted to store and/or use the material at Keyport, grant authorization to bring it on the Base. If appropriate, the manager may also specify methods of storage and/or use. If the job is large enough, contractors will also be required to provide a *Hazardous Material Plan* for review and concurrence prior to the start of any work. This plan will typically be part of the *Environmental Protection Plan*, but may be required as a separate document. A typical *Hazardous Material Plan* includes the following information:

- ◆ An inventory of hazardous materials to be used at the work site. The inventory includes information identifying the material, manufacturer, and describing material

storage requirements and usage. The inventory shall be updated at completion of the project specifying the quantities used. MSDSs must be readily available at the work site where the materials will be used.

- ◆ Procedures for protecting personnel and property during the transport, storage, and use of hazardous materials.
- ◆ A description of the labeling system used to identify contents of all containers on-site.

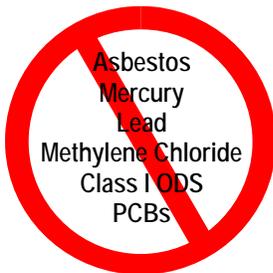
Contractors shall also ensure their employees working at Keyport are apprised of the Occupational Safety and Health Administration (OSHA), Hazard Communication (HAZCOM) standard. This standard states that employees have the “*Right-to-Know*” about hazardous materials in their workplace. Any personnel working with hazardous material should be trained in accordance with the HAZCOM standard. If you are unfamiliar with this standard, you must contact your Contracting Officer before starting any project.



**Quick Tip: Plan jobs to ensure processes or operations use the least hazardous and minimum quantity necessary for the job. This saves costs and reduces waste.**

## **What Hazardous Materials are Prohibited?**

Materials that contain asbestos, mercury, or Polychlorinated Biphenyls (PCB) shall never be used.

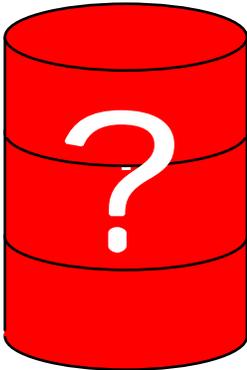


Class I Ozone Depleting Substances (ODS) shall not be used, nor be provided as part of any equipment. This prohibition is in effect for all Department of Defense activities and shall take precedence and prevail over any other provision of your contract or any specification, drawing, or referenced document.

Class I ODS substances generally consist of products such as solvents and refrigerants that contain Chlorofluorocarbons (CFC), or fire extinguishing agents such as Halon. If you need assistance in determining if your products contain Class I ODS, contact your Contracting Officer or call the Air Quality Manager identified in the list on page ii.

# DANGEROUS WASTE MANAGEMENT

## What is Dangerous Waste?



A waste is considered dangerous if it meets certain levels of reactivity, ignitability, corrosivity, or toxicity, or is otherwise listed as a dangerous waste. The State of Washington regulates more waste as dangerous than mandated by Federal Law, and has adopted the term “**Dangerous Waste**” to include Federal *hazardous* waste **and** State regulated waste. All listed dangerous waste can be found in the *Washington State Dangerous Waste Regulations* (WAC 173-303). A copy of the WAC may be obtained by contacting the Washington Department of Ecology Records Center at (360) 407-6038 or retrieved from the DOE website: <http://www.ecy.wa.gov/laws-rules/ecywac.html>.

Keyport uses the terms *hazardous waste* and *dangerous waste* interchangeably, so whenever the term hazardous waste is used, it includes all waste regulated by Washington State.

## Why is Dangerous Waste Compliance so Important?

**Dangerous Waste Compliance** is a responsibility you must plan for and accept as a cost of doing business at Naval facilities. Non-compliance can be very costly, and will not be tolerated by Keyport or the regulators.

Proper coordination and operations at Keyport are not only needed for compliance reasons, they also benefit your project by preventing time delays or operational shutdowns, and improve public relations. To this end, you should take a proactive approach to your policies, procedures, and operations.

## Identifying Waste

All waste, not just the waste that is known to be dangerous or hazardous, must be designated. The Keyport Dangerous Waste Program designates and tracks all dangerous waste generated at Keyport. You may be asked to provide a Waste Profile sheet if you are arranging for the transport of waste off-base.

The Keyport Dangerous Waste Program Manager will try to identify your potential waste streams at the initial meeting. If these waste streams are determined before you create them, it eliminates having to control everything as a potential dangerous waste. Once a waste stream is identified, it is added to the waste tracking system that contains all designated waste streams for Keyport. The **Waste Generation Record (WGR)** that Keyport uses to record new wastestreams is shown here in Figure 1. You will be expected to provide any information requested in order to properly designate the waste.

# WASTE GENERATION RECORD (WGR)

|  |   |                     |                   |
|--|---|---------------------|-------------------|
| GENERATOR'S NAME<br>a  |   | MAY ALSO STOW<br>b  |                   |
| GENERATOR'S CODE<br>c  |   | BLDG/LOCATION<br>d  | PHONE NUMBER<br>e |
| SITE MANAGER'S NAME<br>f   |   | PHONE NUMBER<br>g   |                   |
| SITE MANAGER'S CODE<br>h   |   | SITE ID NO.<br>i    | WGR NUMBER<br>j   |
| WASTE  |   |                     |                   |
| WASTE NAME<br>k  |   |                     |                   |
| PROCESS GENERATING WASTE<br>l  |   |                     |                   |
| PROJECTED WASTE GENERATION (CIRCLE UNITS USED)<br>m                      LB.                      Per                      WK.                      MO.                      YR. |   |                     |                   |
| DESCRIPTION  | COMPOSITION                                     |                     | % / PPM           |
| pH<br>n  |   |                     |                   |
| COLOR<br>o   |   |                     |                   |
| LAYERS<br>p  | t   |                     | u                 |
| FLASHPOINT<br>q  |   |                     |                   |
| PHYSICAL STATE<br>r  |   |                     |                   |
| SPECIFIC GRAVITY<br>s  |   |                     |                   |
|  |   |                     |                   |
|  |   |                     |                   |
| CERTIFICATION<br>To the best of my knowledge the above information is complete and accurate  |   |                     |                   |
| GENERATOR'S SIGNATURE<br>v   |   | DATE<br>w           |                   |
| MANAGER'S NAME<br>x  |   | DATE<br>y           |                   |
| WASTE OPERATION BRANCH USE ONLY BELOW THIS LINE  |   |                     |                   |
| WIT NO.  | HAZARD CLASS                                    | UN/NA NO.           |                   |
| SHIPPING NAME  |   |                     |                   |
| EPA/WDGE NO. (S)   |   | WDGE DESIGNATION    |                   |
| DOT MAJOR RISK LABEL (S)   |   | SPECIAL MARKING (S) |                   |
| COMMENTS   |   |                     |                   |
| [ ]  | DUMPSTER  | [ ]                 | SEWER             |
| [ ]  | TURN-IN TO SITE MANAGER/WASTE OPERATIONS BRANCH |                     |                   |
| SIGNATURE  |   | DATE                |                   |

**Figure 1 – Waste Generation Record (WGR)**

## Will I be Responsible for Sampling my Waste?

Regardless of who is responsible for disposing of dangerous waste, Keyport will direct all sampling and analysis functions. The Dangerous Waste Program Manager will coordinate sample collection and testing with the contractor at the initial meeting.

## Accumulating Waste



All hazardous substances are carefully controlled and Keyport prefers that contractors not manage dangerous waste unless it is specified in the contract. A *Treatment, Storage and Disposal Facility* (TSDF) is located on Base and will pick up and receive all dangerous waste generated by the Government and Contractors. Containers will be provided to the work site and picked up at the end of each day if the generated quantity is sufficient. These containers must be managed in accordance with the procedures specified below. If waste will accumulate on site for more than 24 hours, the Dangerous Waste Program Manager will provide additional instructions for storage and disposal.

- ◆ Containers must be closed at all times, except when waste is being added or removed. Containers with liquids must be closed and secured with ring and bolt, or bung screwed in (wrench tight) and provided with secondary containment that will contain 100% of the single largest container present and at least 25% of all containers. Containers with solids must have snug fitting lids. If you have waste that is classified as a volatile organic compound, the container must be closed in accordance with special requirements that will be provided by the Dangerous Waste Program Manager.
- ◆ No items except waste specifically designated for the container may be placed in the container. Any questions about what can be placed in the container should be directed to the Dangerous Waste Program Manager.
- ◆ Only re-use containers for the same waste stream, unless they are uncontaminated overpack containers.
- ◆ Position containers so that the labels are clearly visible. Place the labels on the side of the upper one-third of the drum whenever possible. When using roll-off boxes, place labels on the door of the container.
- ◆ Maintain a 36-inch aisle space between each row of containers. This is required so that containers can be readily inspected and personnel have access to them.
- ◆ Most waste will be designated. Keyport requires that all known dangerous wastes have an ID Label on the accumulation container(s). The label must reflect the contents of the container and the ID label should be visible for inspection. The Government will supply all labels.

In some cases waste will not be designated until tests are performed to verify the dangerous constituents. In such cases, each waste container is put into a separate secondary containment and labeled as “*Waste Awaiting Designation*”. These containers should be physically segregated from containers of designated dangerous waste.

## **Tracking Waste**

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An inventory of all waste picked up from the site is required. The Keyport Dangerous Waste Program Manager will maintain this inventory.

## **Storing Waste**

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The Keyport Dangerous Waste Program Manager assumes the responsibility for designating and collecting contractor-generated waste, but you are responsible for its storage, labeling, and proper containerization. Before any waste is accumulated the Dangerous Waste Program Manager will inspect your area and certify it for use if all requirements have been met. The following is a quick list of major requirements that you are responsible for. Adhering to these guidelines will help you store your waste in a safe manner and protect you from inadvertent compliance violations:

- ◆ The area cannot be located on a pier or upslope from a storm drain.
- ◆ All wastes must be transported to the TSD within 90 days of the accumulation start date.
- ◆ The area will be used only for the storage of waste and waste awaiting designation. It will not be used to store hazardous materials, equipment, or processes.
- ◆ Container use and management requirements that are specified above, in your contract specifications, and in your *Environmental Protection Plan*, must be followed.

Signs reading “**HAZARDOUS WASTE ACCUMULATION AREA**” and “**DANGER - UNAUTHORIZED PERSONNEL KEEP OUT**” must be posted at the entrance to the accumulation area and must be legible from a distance of 25 feet or more.

“**NO SMOKING OR OPEN FLAME**” signs must be posted on all visible sides of the accumulation area and must be legible from 50 feet.

- ◆ The Keyport Dangerous Waste Program Manager will conduct periodic inspections of the accumulation area. The Manager will maintain a logbook of the inspections in which any findings and actions taken are recorded. Any significant findings of

non-compliance will be forwarded to the Contracting Officer for review and action, if required.

- ◆ Prior to closure of the accumulation area, all containers, liners, bases, and soil (as applicable) must be decontaminated or removed. The Contracting Officer and the Keyport Dangerous Waste Program Manager shall be notified within 3 working days, so that a closeout inspection may be arranged.

## **Turning in your Waste**

The Dangerous Waste Program Manager will direct you on how to turn in dangerous waste. The Manager will supply the appropriate government furnished labels (i.e., ID, HW, and DOT) and provide a tracking number as soon as the waste is profiled. The Waste Disposal Request (WDR) form used is illustrated in figure 2, although contractors will not normally be required to sign it as a generator.

Make arrangements with the Keyport Dangerous Waste Program Manager to ship bulk containers of waste. Non-bulk containers (e.g., 55-gallon drums) need to be turned in to the Government 45 days from the start date. Depending on the quantity of the waste, Keyport may want to ship the waste directly off-site from your area, or may transfer it to the TSD. The Keyport Dangerous Waste Program Manager needs about 45 days if the waste is going to be shipped directly off-site.

## **If you Ship your own Waste**

If your contract specifies for you to provide the transporter, submit copies of the profile(s) to the Dangerous Waste Program Manager for approval at least 20 working days before requesting a manifest. The Government encourages submitting profiles as soon as the waste is first generated. At least 10 days before you want to ship, contact the Keyport Dangerous Waste Program Manager for manifest and Land Disposal Restriction (LDR) preparation. The profile should already be approved. The Keyport Dangerous Waste Program Manager will prepare the manifest and the LDRs. On the date of shipping, personnel from the TSD will verify the type and weight of the waste, and sign the manifest. They keep one copy after the transporter signs in his block and the rest of the documents go with the transporter.

Within ten working days after the final disposal, you are required to submit the Certificate of Final Disposal (CFD). Final disposal means disposal of all wastes and any residues from the treatment of waste prior to disposal. Review your contract specification for all the information included in a CFD.

**WASTE DISPOSAL REQUEST FORM**

---

**WIT:**

**WASTE:**

**WGR Number:**

\*\*\*\* Pickup Requested \*\*\*\*

Phone 396-2320 to request waste pickup

Date: \_\_\_\_\_ Time: \_\_\_\_\_ Person contacted: \_\_\_\_\_

\*\*\*\* Split Breakdown \*\*\*\*

\*\*\*\* Manager \*\*\*\*

Site ID: \_\_\_\_\_ Site Manager: \_\_\_\_\_ Phone: \_\_\_\_\_

Alternate: \_\_\_\_\_ Phone: \_\_\_\_\_

\*\*\*\* Generator \*\*\*\*

Generator: \_\_\_\_\_

Bldg: \_\_\_\_\_ Code: \_\_\_\_\_ Phone: \_\_\_\_\_

\*\*\*\* Certification \*\*\*\*

I certify that the materials listed herein are the only compounds in the waste containers listed above and have not been mixed with any other materials to the best of my knowledge.

Generator's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

\*\*\*\* Label \*\*\*\*

**MARK ACCUMULATION START DATE WHEN WASTE FIRST ENTERS CONTAINERS**

\*\*\*\*\*:\*:\*\*\*\*\*\*

\*\*\*\* Handling Information \*\*\*\*

Physical State: \_\_\_\_\_ Container Type: \_\_\_\_\_ Container Size: \_\_\_\_\_

Accumulation Start Date: \_\_\_\_\_

\*\*\*\*\*Waste Operations Branch Use Only Below\*\*\*\*\*

Pick-up Number: \_\_\_\_\_

Weight (lbs.): \_\_\_\_\_ Volume (gal): \_\_\_\_\_ Consolidation: \_\_\_\_\_

Storage: \_\_\_\_\_ Treatment: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Figure 2 – Waste Disposal Form (WDR)**

# RECYCLING



**Hazardous Waste Minimization** is one of Keyport's top priorities. Some dangerous waste can be recycled and recycling is one tool to help reduce the quantity of waste. The regulations vary on how waste must be managed prior to recycling, depending on the waste itself. The most common categories for recycling are:

(1) Specifically regulated recyclable materials. These are recyclable materials regulated under their own respective sections of Washington State Administrative Code (WAC) 173-303 (e.g., spent lead-acid batteries).

(2) Recyclable materials that are not regulated. These are materials that are not regulated prior to use or reuse (e.g. cardboard or paper).

(3) Recyclable materials that are fully regulated. These materials are fully regulated up to the point when they actually enter the recycling process that recycles the material (e.g. CFCs and anti-freeze).

The majority of waste that is destined for recycling must still be controlled as dangerous waste until the point at which it is reclaimed. The Keyport Dangerous Waste Program Manager will advise you on the proper procedures or refer you to the Solid Waste or Recycling Managers.

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# **STORMWATER AND WASTEWATER**



The purpose of storm drains is to prevent flooding by conveying stormwater runoff (rain, snowmelt) to the Sound. All discharges going directly into surface waters such as Liberty Bay and Port Orchard Reach are strictly controlled and no contaminant discharge is authorized. Examples of prohibited discharges include all hazardous materials and wastes, petroleum products, solvents, wastewater, potable water and groundwater. Only stormwater is allowed into the stormwater drainage system. Potable water and ground water discharges may be permitted through a special request and after a review by the Keyport Stormwater Program Local Point of Contact identified in the list on page ii. All industrial wastewaters must be disposed of in accordance with dangerous waste regulations.



**Quick Tip: All storm drains are marked for easy identification. Get approval before discharging *any* water *anywhere*!**

## **Stormwater General Guidelines**

### **Worksite Cleanup**

- ◆ Keep the work site clean to minimize loss of accumulated debris into the storm drains. When dirt, surplus materials, solid waste, and dropped materials are allowed to accumulate, these materials can be washed into the stormwater system when it rains.
- ◆ Conduct weekly cleanliness inspections of outdoor work and storage areas. Clean up work areas as necessary to maintain control of potential pollutants.

### **Material Storage and Handling**

- ◆ Handle and store materials using methods that reduce or eliminate exposure to rainfall and minimize the potential for spills.
- ◆ Protect containers storing liquids (e.g., fuels, oils, paints, and solvents) from the weather (if applicable, place inside a covered area or under a tarp) in a secure location away from drains. Proper protection methods require placing materials inside secondary containment and using rubber mats over storm drains when loading and unloading supplies from trucks and trailers. You are responsible for establishing the secondary containment if none exists. Secondary containment is an impervious basin compatible with all materials stored in the basin, and large enough to contain 100% of the single largest container or 25% of all containers stored, unless the containment is exposed to storm water. In that case, the containment must be able to hold 125% of the single largest container.
- ◆ If outdoor material storage is necessary, protect smaller parts, materials, and containers from the weather and place them on pallets and under tarps.

## Drip Pans

- ◆ When doing work where drips or leaks could occur, use drip pans or other protective devices to prevent pollutants from getting on the ground.
- ◆ Use drip pans or other protective devices at hose connections when transferring oil, fuel, solvent, industrial wastewater, paint and hazardous substances/wastes. Use them also when making and breaking hose connections. Where design constraints, vertical connections, or interferences do not allow use of drip pans, use other measures such as chemical resistant drapes.
- ◆ Immediately repair, replace, or isolate leaking connections, valves, pipes, hoses, and soil chutes carrying wastewater, fuel, oil, or other hazardous substances/wastes. Place drip pans under leaking connections before starting any corrective action.

## Control of Dust and Overspray

- ◆ Carry out any activity that generates pollutants (i.e. grinding, welding, painting) in enclosed, covered areas to the maximum extent practical.
- ◆ Perform spray paint operations in a way that contains the over spray and spillage and minimizes emissions of particulates.

## Preventive Maintenance

- ◆ Regular preventive maintenance on vehicles and equipment will help prevent drips and leaks from washing into storm drains when it rains. **NOTE: No contractor preventive maintenance or equipment repair is authorized within the Keyport fenceline. All equipment must be moved offsite for maintenance or repairs.**
- ◆ Inspect your vehicles and equipment for leaks before use. Immediately stop all identified leaks.

## Discharges

- ◆ Unless authorized by the NUWC Keyport Environmental Compliance Branch Program Manager in writing, do not discharge anything into the storm drains.

## Dewatering

- ◆ Special requirements apply to dewatering of excavations because some areas are contaminated. Contact your Contracting Officer or the Keyport Stormwater Program Local Point of Contact identified in the list on page ii for specific direction if dewatering is anticipated.

## **Equipment Cleaning**

- ◆ The preferred method is to arrange for cleaning of equipment off-base. Never discharge rinse-water directly into the storm drains or allow it to run into Liberty Bay or the Port Orchard reach. Contact the Keyport Stormwater Manager if any cleaning of equipment is required.

## **Wastewater General Guidelines**

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Our Industrial Wastewater Discharge Permit strictly regulates industrial discharges into the sanitary sewer. This permit prohibits the introduction of any pollutants that would interfere with the operation of the Offsite (Brownsville) Wastewater Treatment Plant.

For information concerning any possible discharges to the wastewater system contact the Keyport Wastewater Program Manager identified in the list on page ii.

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# **SPILL PREVENTION**



To ensure protection of Washington waters, land, air, and natural resources from the impacts of Oil and Hazardous Substance (OHS) spills, you must operate in a manner that will provide the best protection for the environment. Implementing the following procedures will help reduce the risk of a spill occurring and protect the area if one does occur.

## **Preventative Measures**

- ◆ All OHS Handling and Transfer Equipment shall be inspected prior to use and during intervals of the operation to ensure equipment is in proper working condition. All connections and transfer points shall be carefully checked prior to, during, and after transfer operations to monitor for leaks. Hose connections shall be wrapped and/or containment placed under them.
- ◆ All OHS shall be carefully controlled and all OHS liquid storage areas must be properly managed. Areas that can impact the stormwater system must have discharge control structures (e.g., curb, sumps, secondary containments, or other types of spill prevention) to contain potential spills, leaks, and discharges. Storage of OHS containers in uncovered secondary containment locations must have provisions for sampling of, controlled draining of, and proper disposal of stormwater that accumulates in the containment area. You, as a contractor, are responsible for storing your OHS only in authorized areas and in an authorized manner.
- ◆ Keyport will respond to all spills, but contractors must provide a spill response kit and discharge control devices for any handling and transferring operation involving a large amount of OHS. The kit needs to contain items appropriate for the clean up of the type of spill that could occur. If you have any questions concerning this requirement, call the Environmental Branch at (360) 396-7090 and you will be directed to the appropriate point of contact for clarification.

## **Required Training**

The Washington Department of Ecology requires that all personnel involved in oil handling operations are certified. Certification is accomplished by successful completion of a training course in Oil Spill Prevention and Response. Key supervisory and operations personnel must have a certification that meets the requirements of WAC 173-180C.

Key operations personnel are identified as employees with direct involvement in the transfer, storage, handling, or monitoring of oil (e.g., person-in-charge, storage tank operators, or oil transfer monitors). Key supervisory personnel must directly supervise the transfer, storage, handling, or monitoring. Before conducting any OHS transfer at

Keyport you are responsible for ensuring your personnel are trained to the State and facility specific requirements **before** starting the operation.

If you need additional help or clarification on the required training for certification, contact your Contracting Officer or the NUWC Keyport Environmental Branch at (360) 396-7090 and you will be directed to the appropriate point of contact for clarification or call.

## **What Should I do if I have a Spill?**

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A **Spill Event** involves the unauthorized spilling, leaking, pumping, emitting, emptying, discharging, injecting, escaping, leaching, disposing, or dumping of oil or a hazardous substance. A spill event can be categorized as non-emergency or emergency.

### **EMERGENCY Spill Event**



An emergency spill event is any release of a known or unknown material or hazardous substance that poses an immediate threat to human health or the environment and is not classified as a non-emergency spill event. In these situations, the individual that discovers the spilled material must immediately place an emergency call (see Page 32 for more calling information) and request assistance. All unpermitted or uncontrolled releases on land, or discharges to any waterways or outside Keyport properties, are classified as emergency spill events.

#### **Actions Required:**

- ◆ From a personal or company supplied mobile phone or a non-Navy phone call: (360) 396-4444. From a Navy phone call: 911 to report the event. (See Page 32 for more calling information)
- ◆ Provide the requested information.
- ◆ If it is safe and necessary, try to stop the source of the spill or contain it to prevent it from going into drains or waterways.
- ◆ If you don't know the properties of the material or do know that it is a threat to human health, evacuate the area and go upwind.
- ◆ Warn others in the area and direct them upwind.
- ◆ Ask someone to warn others away from the spill site.
- ◆ Maintaining a safe distance, return to the spill site and stand by for emergency response personnel.
- ◆ If you are able to, provide the Material Safety Data Sheets for the spilled material to the emergency response personnel when they arrive.



**Quick Tip: From a personal or company supplied mobile phone or a non-Navy phone call: (360) 396-4444. From a Navy phone call: 911 to report the event. An emergency response team can be at your site very quickly. (See Page 32 for more calling information)**

## NON-EMERGENCY Spill Event



A non-emergency spill event is a discharge of a known material or any hazardous substance that does not pose an immediate threat to human health or the environment, can be cleaned up as part of normal housekeeping by the personnel who discovered the spill, and is **not** released on the soil or into any waterway inlet (e.g., storm drain) or outside the Keyport boundaries.

### Actions Required:

If the spill can be *completely* cleaned up and all cleanup materials can be properly disposed of without any damage to the environment, no reporting is required. Otherwise notification *must* be made even if the spill is completely contained and poses no known threat to human health or the environment.

- ◆ Stop the source of the spill.
- ◆ From a personal or company supplied mobile phone or a non-Navy phone call: (360) 396-4444. From a Navy phone call: 911 to report the event. (See Page 32 for more calling information)
- ◆ Contain the spilled material by keeping the spill away from drains or waterways and by blocking off drains located near the spill if the spill may reach them.
- ◆ Clean up the spilled material wearing the proper personal protective equipment.
- ◆ Dispose of the spill debris as a potential dangerous waste per designation.

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# **AIR POLLUTION**

## **What is Air Pollution?**



Air pollution is caused by airborne contaminants that can be injurious to human health, plant or animal life, or which can unreasonably interfere with enjoyment of life and property. The Puget Sound Clean Air Agency (PSCAA) is the local regulatory agency responsible for air pollution control, including all asbestos, demolition, and renovation work.

## **How do I Control Air Pollution?**

PSCAA requires the use of Best Available Control Technology (BACT) to control fugitive emissions. Fugitive emissions are those emissions (e.g., dust, mist, vapors, fumes) not caught by a capture system. Depending on the project, BACT can be as simple as a light water spray or as complex as a Class I containment system. Some examples include:

- ◆ Perform spray-painting operations inside a spray enclosure equipped with an overspray emission collection device. If you are working outdoors, reasonable methods such as tarps, shrink-wrap or mobile enclosures shall be used.
- ◆ Keep containers of paints or solvents closed unless they are being used.
- ◆ Control dust from construction, road travel, demolition projects, sanding, grinding, concrete work, abrasive blasting, and clean-up work with a BACT such as water spray, enclosures, or control equipment.

No internal combustion or compression ignition engine may be used inside buildings or any confined space unless specific provision is made to conduct exhaust gases to the outside air, or the Air Quality Manager agrees that the area is adequately ventilated so as to prevent the accumulation of dangerous gases.

All air pollution source and control equipment brought to Keyport must be maintained in good working order and maintained per manufacturer's recommendations. The Contracting Officer may direct that defectively maintained equipment be secured until adequate repairs are completed.

## **Do I Need a Permit?**

PSCAA requires notification for asbestos removal and demolition projects. Receipt of the processed notification with PSCAA's case number and review signature constitutes a "permit" to start work. A Notice of Construction (NOC) is required for the installation of new equipment that has the potential for creating air pollution.

## **What do I Need to Know About Asbestos?**

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The government is responsible to identify all asbestos that will be removed or is likely to be disturbed. Contractors are responsible to ensure their employees and work areas are in compliance with the applicable OSHA and PSCAA regulations when working on an Asbestos Project. PSCAA defines an Asbestos Project as any activity involving the abatement, renovation, demolition, removal, salvage, clean up, or disposal of asbestos-containing material (ACM).



**Quick Tip: Contractor employees performing work on an Asbestos Project must be trained and certified before beginning any asbestos work.**

### **Asbestos Removal Permit**



Site surveys of buildings that contain asbestos are maintained in Bldg. 206 (Facilities Division). The contractor will meet with the Asbestos Manager identified in the list on page ii to review all work that involves the abatement of asbestos containing material or to review specific locations where potential disturbance might occur. Should an accidental disturbance of asbestos containing material occur, the contractor will immediately suspend operations and from a personal or company supplied mobile phone or a non-Navy phone call: (360) 396-4444. From a Navy phone call: 911 to report the event. (See Page 32 for more calling information)

When the asbestos survey results show asbestos is present in the building, you must submit a Notification for Asbestos Removal through PSCAA at least ten days prior to start of work. Your approved notification (“permit” to disturb or remove asbestos or perform a demolition) must be in-hand prior to work. Provide a copy of the approved notification to your Contracting Officer and the Asbestos Manager or Air Quality Manager prior to starting work.

**NOTE:** If the amount of Asbestos removed from a single building does not exceed 260 linear feet or 160 square feet per year, the amount may be covered by Keyport’s annual permit and a separate permit may not be required. Check with your Contracting Officer or the Air Quality Manager identified in the list on page ii.

### **Asbestos Waste**

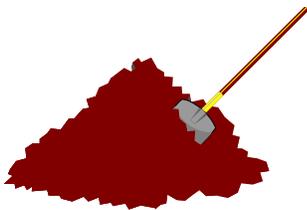
Asbestos waste must be transported by a hauler who is licensed to do so, and disposed of at a landfill permitted to receive asbestos waste. The Dangerous Waste Program Manager will make arrangement for the disposal of all asbestos material removed from Keyport buildings.

# EXCAVATIONS

## Dewatering

Dewatering of excavations is complicated by the fact that some areas are contaminated and special requirements apply. Contact your Contracting Officer or the Keyport Stormwater Local Point of Contact identified in the list on page ii for further direction if dewatering is anticipated.

## Soil Management



You need to know if your work will take place in a contaminated site. This knowledge serves two purposes, one is for health and safety reasons, and the other is for determining possible options for excess soil. How much soil will be reused at the same site is also important information. Regardless of where soil is being excavated, the following guidance applies for reusable and non-reusable soil at the same worksite, unless otherwise approved by the Contracting Officer or the Keyport Dangerous Waste Program Manager identified in the list on page ii. Remember that all soil is considered to be a “Problem Waste” until it has been sampled and designated.



**Quick Tip: All soil is considered to be a “Problem Waste” until it has been sampled and designated.**

**(1) When soil is reusable at the same work site.** Accumulate reusable soil within the same area as the excavation from which it was removed, preferably as near to the excavation as practicable. Create a soil pile storage area in the following manner:

- ◆ Soil piles should be located on an impervious area such as concrete, asphalt concrete, or compacted gravel (in order of preference). The Contracting Officer will designate the location of the soil pile.
- ◆ Install a berm around the pile so that soil remains in the designated area.
- ◆ Unless the soil pile is actively accessed, it should be covered with an impervious continuous sheet of plastic, ten mil minimum thickness, extending over the outside of the berm so that rainwater is directed away from the soil inside the berm. The edges of the plastic cover must extend beyond the berm and be secured with weights such as sand bags located outside the berm to keep the cover in place. If it is necessary to join two or more sheets of plastic to cover the pile, all seams shall be welded, heat sealed, or taped continuously on both sides of the sheet.

**(2) When soil is not reusable at the same work site.** Soil may not be reusable due to compaction, excavation needs or other reasons. If this is the case, check with your Contracting Officer to see if it can be used somewhere else at Keyport. This may require testing, depending on where the soil came from and where it will be placed. If not, it is waste soil and must be designated. The Keyport Dangerous Waste Program Manager will arrange for any sampling and will designate the waste.

# SOLID WASTE



This section describes the control, management, and recycling or disposal of solid waste. Remember that **all waste**, including what you probably would think of as “trash,” is designated prior to removal from Keyport. At Keyport, the term “**Solid Waste**” is used to describe designated waste that has **not** been given the designation by the government as *Dangerous Waste, PCB, or Asbestos*. This term can include construction debris, liquids, and landfill-controlled waste.

## Control and Management

- ◆ Place solid waste in approved, labeled containers, so that it is not stored on the ground.
- ◆ If recycling is an option for a waste stream (e.g., asphalt, concrete, cardboard, scrap metals & unpainted, untreated wood) keep the other types of “trash” out of it.
- ◆ Good housekeeping is important. Keep your solid waste accumulation area, and the surrounding area, clean and free of debris.
- ◆ Remember that *liquids are not allowed in the dumpster or at the landfill!* Containerize and recycle or dispose of in accordance with your Environmental Compliance Plan or this guide.



**Quick Tip: Remember that liquids are not allowed in the dumpster or at the landfill. Containerize and recycle or dispose of liquids in accordance with your *Environmental Compliance Plan* or this guide.**

## Disposition

- ◆ Be sure to empty your containers no less than once per week, unless your Contracting Officer or the Solid Waste Manager has approved a different schedule. Vehicles and haulers used for the transportation of solid waste shall be permitted, licensed, or otherwise approved by the applicable County Health District(s).
- ◆ Ensure your waste is **not** taken to any site that has **not** been approved by the government **prior** to removal from the work site, and ensure your driver takes the waste where you told the government it was going to go.
- ◆ **You** are responsible to ensure no disposal action is taken that can be construed as illegal dumping.
- ◆ Remember that a cover must be in place over the waste while it is being transported.

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## POLYCHLORINATED BIPHENYLS (PCBs)



Since 1979, the Environmental Protection Agency has regulated the use, storage, disposal, and distribution in commerce of PCBs. The law for PCBs is the Toxic Substance Control Act (TSCA). Most people immediately think about electrical transformers or maybe fluorescent light ballasts.

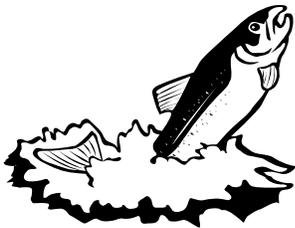
Light ballast may or may not contain PCB. If they are not marked "No PCB" then they are assumed to contain greater than 50 parts per million (ppm) PCB and are fully regulated under the TSCA. Keyport no longer has transformers containing greater than 50 ppm PCB; however, some do contain less than that amount. All transformers should be labeled identifying their PCB content. Discarded transformers, capacitors, or bushings containing PCB at concentrations of 2 ppm or greater (except when drained of all free-flowing liquid) are regulated in this State as dangerous waste. Fluid, core, and core papers from these specific sources are also regulated in this State as a dangerous waste when generated from the salvaging, rebuilding, or discarding of transformers, capacitors, or bushings.

Keyport will take samples of materials that have shown in the past to contain PCBs above the regulatory limit of 50 ppm. Once the results of the analysis from these samples are available, a plan should be developed which includes how to manage and dispose of the waste. Responsibilities for disposal should be specified in the contract. The process for the management, transport, and disposal of PCBs is similar to dangerous waste.

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# NATURAL AND CULTURAL RESOURCES

## What are Natural Resources?



Natural resources are comprised of all the **non** man-made features of the Base. This includes but is not limited to soil, streams, water-bodies, animals, plants, and trees. The Navy is required to protect and preserve these natural resources.

**Natural Resources Compliance** requires extra steps be taken to ensure certain aspects of the natural environmental are protected. There are many laws that direct the Navy, and therefore those working under contract to the Navy, to protect and preserve natural features of the land. One such law is the Endangered Species Act. Presently there are several species on the Threatened and Endangered (T&E) Species List that are found on or around NUWC Division, Keyport. Depending on the nature of the project some restrictions may be imposed on the work being performed. Most of these restrictions deal with timing and should not affect the performance of the project. You should be made aware of any restrictions or limitations in terms of T&E species when your project goes through the Keyport review cycle. Contact your Contracting Officer for specific information concerning the preservation and protection of natural resources.

## What are Cultural Resources?



Cultural Resources are historic buildings, places, or artifacts that hold some significant importance to the history of our nation. Cultural resources are also archeological artifacts that are identified as remnants of past historic or pre-historic civilizations.

**Cultural Resources Compliance** requires that we protect and preserve those cultural resources identified as significant. At NUWC Division Keyport, most of the cultural resources are historic in nature. These resources are the buildings and quarters on Base that have been identified as being eligible for listing on the National Historic Register. The Integrated Cultural Resources Management Plan identifies the structures that have been determined eligible. Archeological artifacts at NUWC Division Keyport are uncommon. However, if something is discovered during excavation that may be an archeological artifact (including human remains) the law requires that any work that could further damage the archeological site is stopped and the Contracting Officer is notified immediately. It should be noted that intentional disturbance of archeological sites or removal of artifacts from Federal property is subject to criminal prosecution and civil penalties under Federal law.

# Navy Emergency Contact Information



When an emergency happens, minutes matter and valuable time can be lost if searching for an emergency contact or location information. It is important to note that there are differences when calling from one installation or another and when using your personal mobile phone.

## Personal/Company Mobile, or Non-Navy Phones

When using a personal or company supplied *mobile phone* or a *non-Navy phone* call:

**Navy Regional Dispatch Center:**

**Emergency Phone: (360) 396-4444**

**Non-Emergency Phone: (360) 315-4064**

NOTE: All 911 calls made from mobile phones or non-Navy phones are routed to Kitsap County Central Command (CENCOM), which must then relay your information to the Navy Regional Dispatch Center. This is an unnecessary additional step, which could delay response.

## Navy Phones

When using a *Navy phone* on a Navy exchange call:

**Navy Regional Dispatch Center:**

**Emergency Phone: 911**

**Non-Emergency Phone: 5-4064**

**NUWC Keyport Duty Office Only:**

**Non-Emergency: 6-2244**

Critical information the dispatcher needs to know:

- ◆ **WHAT BASE ARE YOU CALLING FROM?** Keyport or Bangor Annex.
- ◆ **WHERE IS THE EMERGENCY?** Give the address, nearest cross street, and include building number, spelling out, e.g.; Building One-Zero-Five-Zero, instead of Building Ten-Fifty.
- ◆ **WHAT'S THE EMERGENCY?** Medical, HAZMAT Spill, Explosive incident, Fire (Smell of smoke, etc.)
- ◆ **WHO NEEDS HELP?** Age, gender and number of people.

Once you have related the information the dispatcher will verify it, so don't hang up yet! Remain calm and give direct answers to the questions asked. Speak slowly and clearly. The dispatcher will ask additional questions so they can send the right type of help. All questions are important. The dispatcher may also provide you with CRITICAL PRE-ARRIVAL INSTRUCTIONS, so listen carefully. Lastly, ensure someone with knowledge of the emergency is standing by at the building entrance or street corner to flag down responding units and escort them to the scene.