Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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CONNECTICUT HAZARDOUS WASTE PERMIT RENEWAL

TO OPERATE A

HAZARDOUS WASTE STORAGE FACILITY UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

FOR

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

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SECTION I

STANDARD FACILITY CONDITIONS
RCRA PART B PERMIT RENEWAL

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
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SECTION I
STANDARD FACILITY CONDITIONS

(A) DESIGN AND OPERATION. The Permittee shall operate, maintain and repair the Facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

(B) EFFECT OF PERMIT

(1) Except as is provided for in the Regulations of Connecticut State Agencies (RCSA) Section 22a-449(c)-110(a)(2) and except for any federally enforceable requirement(s), compliance with this Permit during its term constitutes compliance, for purposes of enforcement, with Section 22a-449(c) of the Connecticut General Statutes (CGS). This Permit may be modified, revoked and reissued, or terminated by the Commissioner of the Department of Energy and Environmental Protection ("the Commissioner") during its term as set forth in RCSA Section 22a-449(c)-110(a)(1), which incorporates by reference Title 40 of the Code of Federal Regulations (CFR) Sections 270.41, 270.42 and 270.43, as modified by 22a-449(c)-110(a)(2).

(2) The issuance of this Permit does not authorize any injury to persons or property, invasion of other private rights, or any infringement of state or local law or regulations.

(C) SEVERABILITY. The provisions of this Permit are severable, as specified in 40 CFR 124.16, and if any provisions of this Permit, or the application of any provision of this Permit to any circumstances is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

(D) CONFIDENTIAL INFORMATION. The Permittee may claim that any information required to be submitted by this Permit contains or constitutes a trade secret in accordance with Section 1-210(b)(5) of the CGS.

(E) DUTIES AND REQUIREMENTS

(1) Duty to comply. The Permittee shall comply with all conditions of this Permit, except that the Permittee need not to comply with the conditions of this Permit to the extent and for the duration that such noncompliance is authorized in an Emergency Permit that explicitly authorizes any such noncompliance. Noncompliance by the Permittee with the terms of this Permit, except under the terms of an Emergency Permit, shall constitute a violation of this Permit and any applicable laws or regulations and is grounds for enforcement action, for permit termination, revocation and reissuance or denial of a permit renewal. Emergency Permit as used herein shall mean Emergency Permit as identified in 40 CFR 270.61. Unless superseded by a more stringent provision in this Permit, in which case the more stringent provision of this permit shall apply, as a condition of this

Permit, the Permittee shall comply with all of the applicable requirements of the state's hazardous waste regulations RCSA Section 22a-449(c)-100 et seq., including any applicable portion of 40 CFR 260 through 279 incorporated by reference therein.

(2) Duty to reapply. If the Permittee wishes to continue engaging in an activity regulated by this Permit after the expiration date of this Permit, the Permittee shall apply for a renewal permit at least one-hundred-eighty (180) calendar days before this Permit expires, in accordance with Section 22a-3a-5 of the RCSA and any other applicable law.

(3) Need to halt or reduce activity not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce any activity authorized by this Permit in order to maintain compliance with the conditions of this Permit.

(4) Duty to mitigate. In the event of noncompliance with this Permit, the Permittee shall take all reasonable steps to minimize releases to the environment and shall carry out such measures as are reasonable to prevent its noncompliance from having significant adverse impacts on human health or the environment. No action taken by the Permittee pursuant to this section of this Permit shall affect or limit the Commissioner's authority under any other statute or regulation.

(5) Proper operation and maintenance. The Permittee shall at all times properly operate and maintain the Facility and all systems of storage, treatment and control (and related appurtenances) installed or used by the Permittee to achieve compliance with this Permit. Proper operation and maintenance at a minimum include effective performance, adequate funding, adequate operator staffing and training, and adequate analytical data, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this Permit.

(6) Permit actions. This permit may be modified, revoked and reissued, or terminated as provided for in 40 CFR, Subpart D, Parts 270.40 through 270.43, as modified by RCSA Section 22a-449(c)-110(a)(2), and in accordance with all applicable law, including but not limited to, Sections 22a-6g and 6h of the CGS and Section 22a-3a- 5 of the RCSA. The filing of a request by the Permittee for a Permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any condition of this Permit.

(7) Property rights. This Permit does not convey any property rights of any sort, or any exclusive privilege to the Permittee.

(8) Duty to provide information. The Permittee shall furnish to the Commissioner, within a reasonable time, any information which the Commissioner may request to determine whether cause exists for modifying, revoking and reissuing, or

terminating this Permit or to determine compliance with this Permit. The Permittee shall also furnish to the Commissioner, upon request, copies of records required to be kept by this Permit.

(9) Inspection and entry. The Permittee shall allow the Commissioner, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:

(a) Enter at reasonable times upon the Permittee's premises where a regulated Facility or activity is located or conducted, or to where records shall be kept under the conditions of this Permit;

(b) Enter at reasonable times upon the Permittee's premises where a regulated Facility or activity is located or conducted, or to where records shall be kept under the conditions of this Permit;

(c) Have access to and copy at reasonable times, any records that shall be kept under the conditions of this Permit;

(d) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this Permit; and

(e) Sample or monitor at reasonable times, for the purposes of assuring the Permittee's compliance with this Permit or as otherwise authorized by RCRA, any applicable statute, any substances or parameters at any location.

(10) Monitoring and records

(a) Samples and measurements taken for the sole purpose of monitoring shall be representative of the monitored activity.

(b) The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit, the certification required by 40 CFR 264.73(b)(9), and records of all data used to complete the application for this Permit and comply with the requirements of this Permit, for a period of at least three (3) years from the date of the sample, measurement, certification, report or application. This period may be extended by request of the Commissioner at any time. The Permittee shall maintain records from all groundwater monitoring wells and associated groundwater surface elevations, for the active life of the Facility.

(c) Records for monitoring information shall include

(i) The date, exact place and time of sampling or measurements;
(ii) The individual(s) who performed the sampling or measurements
(iii) The date(s) analyses were performed;
(iv) The individual(s) who performed the analyses;
(v) The analytical techniques or methods used; and
(vi) The laboratory results of such analyses.

(d) Each record or report required by this Permit, including, but not limited to, records in the Operating Record for the Facility and reports submitted to the Commissioner, shall be true, accurate and complete to the best of the knowledge and belief of the person responsible for generating or signing such record or report, based on personal examination and familiarity with the information contained in the record or report, including all attachments thereto, and reasonable investigation, including, as necessary, inquiry of those individuals responsible for obtaining the information contained in such record or report.

(11) Signatory requirements. The Permittee's application and all reports or information submitted to the Commissioner by the Permittee pursuant to this Permit shall be signed by the person specified in and contain the certification prescribed by RCSA Section 22a-449(c)-110(a)(1), incorporating 40 CFR 270.11.

(12) Transfers. This Permit is not transferable to any person without the advance written authorization of the Commissioner, who may request whatever information the Commissioner deems necessary regarding the potential transferee. Before any such transfer, the Permittee and any proposed transferee shall fully comply with the requirement of Section 22a-6o of the CGS and any applicable requirement of 40 CFR 260 seq., relating to the transfer of the Facility or this Permit, including but not limited to 40 CFR 270.40. The Commissioner may require modification or revocation and reissuance of this Permit to change the name of the Permittee and as an incident to any such transfer incorporate such other requirements, as the Commissioner deems necessary.

(13) Reporting requirements

(a) Anticipated noncompliance. The Permittee shall give as much advance written notice as possible to the Commissioner of any planned changes in the Facility or activity that may result in noncompliance with any requirement of this Permit.

(b) Compliance. Except where otherwise provided for in this Permit, reports of compliance and noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule, (Section V) of this Permit shall be submitted no later than fourteen (14) calendar days following each schedule date.

(c) Twenty-four (24) hour reporting:

(i) The Permittee or his designee shall orally report to the Commissioner any waste related activity at the Facility, irrespective of whether such activity is in compliance with the requirements of this Permit, which does or may pose an imminent and substantial endangerment to human health or the environment, immediately but not later than twenty-four (24) hours from the time the Permittee becomes aware or should be aware of the circumstances causing any such endangerment. The report to the Commissioner shall include:

(A) Name, address, and telephone number of the Permittee;
(B) Name, address, and telephone number of the facility;
(C) Date, time and type of incident;
(D) Description of the occurrence and its cause;
(E) Name and quantity of waste(s) or constituents thereof involved;
(F) The extent of injuries, if any;
(G) An assessment of actual or potential hazards to human health and the environment;
(H) Estimated quantity and disposition of recovered waste that resulted from the incident;
(I) All information concerning the release of any waste or constituents thereof that may cause an endangerment to public drinking water supplies; or
(J) All information concerning a release or discharge of waste or constituents thereof or of a fire or explosion from the Facility, which could threaten human health or the environment.

(ii) A written submission shall also be provided within five (5) calendar days of the time the Permittee becomes aware of the circumstances described in subdivision (i) above. The written submission shall contain a description of the endangerment and its cause; the period of endangerment including exact dates and times, if the endangerment has been abated, and if not, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the endangerment. The Permittee shall maintain in the operating record of the Facility a copy of all of such written reports. The Commissioner may waive the five (5) calendar days written notice requirement in favor of a written report within fifteen (15) calendar days of the incident requiring reporting.

(iii) Nothing in this section shall effect or relieve the Permittee of its obligations under Section 22a-450 of the CGS.

(d) Manifest discrepancy report. The Permittee shall report manifest discrepancies in accordance with 40 CFR 264.72, which is hereby

incorporated by reference herein.

(e) Unmanifested waste report. The Permittee shall report unmanifested waste in accordance with 40 CFR 264.76, which is hereby incorporated by reference herein.

(f) Biennial report. The Permittee shall fully and accurately complete and submit to the Commissioner by March 1st of each even numbered year a biennial report regarding waste activities at the Facility for the previous calendar year on a form or electronic method prescribed by the Commissioner. In addition, the Permittee shall provide any other information which the Commissioner specifies relating to the activities at the Permittee's Facility.

(g) Other Noncompliance. The Permittee shall report all instances of noncompliance with this Permit not otherwise required to be reported by this Permit to the Commissioner along with any other required monitoring report, but no later than thirty (30) calendar days of the date the Permittee is aware, or reasonably should have been aware, of any such noncompliance. Any such report shall contain the information listed in paragraph (13)(c)(i) of this Section as well as all steps taken to correct any such noncompliance.

(h) Other information. When the Permittee becomes aware that it failed to submit any relevant facts or incorrect information in a permit application, report or other document provided to the Commissioner regarding this Permit, the Permittee shall promptly submit such relevant facts or correct information to the Commissioner.

(i) Requirements Incorporated. Different sections of this Permit contain requirements for the Facility. Compliance with all of the provisions in each Section of this Permit is required, even if one section or provision of this Permit does not specifically refer to or incorporate requirements from another section or provision of this Permit.

(14) Computation of Time

(a) Computation of time. Except as is expressly provided for in this Permit, the computation of time periods set forth in this Permit shall be as follows:

(i) Any time-period scheduled to begin on the occurrence of an act or event shall begin on the day after the act or event.

(ii) Any time-period scheduled to begin before the occurrence of an act or event shall be computed so that the period ends on the day before the act or event.

(iii) If the final day of any time period falls on a federally or state

recognized legal holiday, the time period shall be extended to the next working day. If the final day ends on a Saturday or Sunday, the time-period shall not be extended to the next working day.

(b) Submission of reports. Where this Permit requires the submission of a written report, a notification or other information or documentation to the Commissioner, such report, notification or other information or documentation shall be deemed submitted, including, but not limited to, submissions made by electronic mail, on the date such report, notification or other information is received by the Department of Energy and Environmental Protection ("the Department").

(15) Waste Minimization. The Permittee shall have a program in place to reduce the volume or toxicity of the waste that is generated to the degree determined by the Permittee to be economically practicable; and the method of treatment, storage or disposal currently available to the Permittee which minimizes the present and future threat to human health and the environment.

(16) Additional Requirements. Requirements not included in this Permit, which become effective by statute or regulation and not made specifically inapplicable to facilities with a Permit shall apply to the Permittee's Facility. In the event of any conflict between this Permit and any such requirement, the Permittee shall comply with the more stringent requirement, provided that if the Permittee does not fully comply with the more stringent requirement, the Department may enforce either requirement.

(17) Federal and State Laws. Nothing in this Permit shall be construed to prohibit any federal, state or political subdivision thereof from imposing any requirements to the extent authorized by law which are more stringent than those imposed by this Permit. In addition, nothing in this Permit shall relieve the Permittee of its obligation to comply with any other applicable federal, state, or local statute, regulation or ordinance.

(18) Modification of the Compliance Schedule Submittals.

(a) The Permittee may request to modify the submittal due dates of the Compliance Schedule (Section V) of this Permit at any time. Such requests shall be submitted for the Commissioner review and written approval and shall include sufficient justification for such request(s).

(b) The Commissioner may grant extensions of submittal due dates based on the Permittee's demonstration that sufficient justification for the extension exists. Extensions to due dates, which this Permit explicitly defines as being due by a certain time or during a certain time interval, may be granted by the Commissioner if sufficient justification for the extension is demonstrated by the Permittee.

(19) Incorporation by Reference.

(a) Unless specifically excluded by the state hazardous waste management regulations, when a provision of the Code of Federal Regulations (CFR) is used in this Permit, all notes, comments, appendices, diagrams, tables, and figures referred to or cited in such provision shall also be included in such reference. In addition, when a provision of the CFR is used or cited in this Permit, such reference shall include all modifications made to any such provision by the state hazardous waste management regulations.

(b) When a provision of the CFR is used in this Permit, unless otherwise noted all internal references contained therein shall also be included by such reference. In addition, each such internal reference to the CFR is intended to include any modifications to such internal reference made by the state hazardous waste management regulations.

(c) In the event of any inconsistency or duplication in the requirements of the provisions incorporated by reference from 40 CFR 260 *et seq*., the state hazardous waste management regulations, and the provisions of this Permit, the provision that is more inclusive or more stringent shall prevail and shall be enforceable.

(F) DEFINITIONS. The following terms shall be defined as follows for the purpose of this Permit. Any term not otherwise defined herein shall be defined as that term is defined in the RCSA Section 22a-449(c)-110(b) and (c).

(1) "Active Portion" means that portion of the Permittee's facility where wastes are being or have been managed, placed and which has not undergone closure in accordance with the terms of this Permit.

(2) “Battery” means a device consisting of one or more electrically connected electrochemical cells, which is designed to receive, store, and deliver electric energy. An electrochemical cell is a self-contained system consisting of an anode, cathode, and an electrolyte, plus such connections (electrical and mechanical) as may be needed to allow the cell to deliver or receive electrical energy. The term battery also includes an intact, unbroken battery from which the electrolyte has been removed.

(3) “Area of Concern” or “AOC” shall mean any area at the Facility where hazardous waste or hazardous constituents have or may have been released.

(4) “Bulking” shall mean the act of adding, consolidating or combining like wastes.

(5) “Code of Federal Regulations” or “CFR,” in reference to all or any portion of 40 CFR 124 and 40 CFR 260 to 279, inclusive, shall mean the Code of Federal Regulations revised as of July 1, 2000. All other references to the Code of Federal Regulations (i.e., references to provisions other than 40 CFR 124 and 40 CFR 260 to 279, inclusive) shall mean the Code of Federal Regulations, in effect

on the date that this Permit is issued by the Commissioner.

(6) "Commissioner" shall mean the Commissioner of Energy and Environmental Protection of the state of Connecticut, or the Commissioner's duly authorized designee.

(7) "Container" shall mean any portable device, not including a roll-off container, a separate type of container defined below, in which a waste or material is stored, transported, treated, or otherwise managed.

(8) "Container Storage Bays" shall mean the entire container storage bays and other appurtenances as shown on Figure II-2 and as specified in Section II (A) of this permit.

(9) "Containment Pallet" shall mean a pallet on which containers are placed equipped with a self-contained secondary containment system sufficient to contain 10 percent of the volume of all containers or 100 percent of the volume of the largest container, whichever is greater, on the pallet.

(10) "CR02" shall mean oil or petroleum waste that is not a hazardous waste and is no longer suitable for the services for which it was manufactured due to the presence of impurities or loss of original properties, and is not miscible in water. The term includes, but is not limited to, crude oil, fuel oil, lubricating oil, kerosene, diesel fuel, motor oil, non-halogenated oil, and oils that are recovered from oil separators, oil spills, or tank bottoms.

(11) "CR03" shall mean oil or petroleum waste that is not a hazardous waste and is no longer suitable for the services for which it was manufactured due to the presence of impurities or loss of original properties, and is miscible in water. The term includes, but is not limited to, cutting oil emulsions and coolants.

(12) "CR04" shall mean any wastes that are not a hazardous waste and are liquid, free flowing or contain free draining liquids and are toxic, hazardous to handle and/or may cause contamination of ground and/or surface water if improperly managed. The term includes, but is not limited to, grinding wastes, waste sludge, antifreeze wastes and glycol solutions.

(13) "CR05" shall mean any chemical solid or semi-solid waste, excluding a hazardous waste, from a commercial, industrial, agricultural, or community activity. The term includes, but is not limited to, grinding, dusts, tumbling sludges, scrap plastic and rubber flash and other ground or chipped waste solid.

(14) "Daily" or "Day" shall mean a twenty-four (24) hour period beginning at midnight.

(15) "Department" or "DEEP" shall mean the Connecticut Department of Energy and Environmental Protection.

(16) "Department of Transportation" or "DOT" shall mean the U.S. Department of Transportation.

(17) "Empty" shall mean empty as prescribed in 40 CFR 261.7(b) and shall also apply to containers of non-hazardous waste or other materials.

(18) "Facility" shall mean the contiguous land and structures, other appurtenances, and improvements on the land within the boundaries/perimeter of the property shown on Figure II-2, Facility Layout.

(19) "Final Closure" shall mean the completion of the closure of all waste management areas at the Permittee's facility in accordance with the requirements of this Permit.

(20) "Hazardous Waste" or "Hazardous Wastes" shall mean any waste material which may pose a present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed, including, but not limited to, hazardous wastes specified in 40 CFR Part 261 and RCSA Section 22a-449(c)-101. The term "hazardous waste" shall include: (a) hazardous wastes that are included in the federal hazardous waste program, even if such wastes have not been added to the State's hazardous waste program; and (b) all hazardous waste included in the state's hazardous waste program, even if such waste is not included in the federal hazardous waste program.

(21) "Hazardous Waste Storage Building 562" or "HWSB-562" shall mean the building where the Permittee's hazardous waste or materials are managed, including all areas incidental to such management as shown on Figure II-2, and as specified in Section II (A) of this Permit.

(22) "Lab Pack Container" or "Lab Pack" shall mean a container that meets the requirements of 49 CFR 173.12, including inner, outer packaging and other requirements.

(23) "Liquid" or Liquid Form" shall mean visibly free flowing, a nearly incompressible fluid that conforms to the shape of its container but retains a (nearly) constant volume independent of pressure. As one of the fundamental states of matter (the others being solid, gas and plasma), it is the only state with a definite volume but no fixed shape.

(24) "Less than 90-Days Hazardous Waste Storage Areas" shall mean those portions of the Permittee's facility where hazardous wastes or other materials are stored for less than 90 days, including all areas incidental to such storage.

(25) "NIOSH" shall mean the federal National Institute of Occupational Safety and Health.

(26) "Non-Hazardous Waste" shall mean any waste material which may pose a present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of or otherwise managed, excluding hazardous

waste.

(27) "Non-RCRA Regulated Media" means Non-RCRA waste solids such as contaminated media (CR05), construction debris, spent filters, scrap metals, unwanted wood and any other material that is not prohibited by this Permit.

(28) "OSHA" shall mean the federal Occupational Safety and Health Administration.

(29) "Other Material" or "Other Materials" shall mean:

(a) The following commercial chemicals, provided such commercial chemicals are used by the Permittee at the Facility:

(i) new, unused or virgin commercial chemicals including chemical intermediates and mixtures;
(ii) off-specification commercial chemical product; and
(iii) commercial chemicals reused without processing of any kind.

(30) "Partial Closure" means the closure of a waste management area in accordance with the applicable closure requirements of this Permit while other waste management areas continue in operation or active.

(31) "PCB" or "PCBs" shall mean any chemical substance that is limited to the biphenyl molecule that has been chlorinated to varying degrees or any combination of substances which contains such substances.

(32) PCB Item" shall mean any PCB Article, PCB Article Container, PCB Container, PCB Equipment, as those terms are defined in 40 CFR 761.3, or anything that deliberately or unintentionally contains or has as a part of it any PCB or PCBs

(33) "Permittee" shall mean the Naval Submarine Base New London, Groton, CT.

(34) "Process Room" shall include the aerosol can puncture area, the oil filter crusher area, the mercuric nitrate reclamation area and structures and other appurtenances as shown on Figure II-2 and as specified in Section II (A) of this Permit.

(35) "Release" or "Spill" shall mean spilling, leaking, pouring, emitting, emptying, pumping, escaping, leaching, dumping, discharging or disposing of wastes or other materials, or constituents thereof, from any container, transportation vehicle, and any other article or device used to contain, convey, or transport waste or other materials into or onto anything or anywhere, including, but not limited to an area used for secondary containment, except as an authorized activity under Section II of this Permit.

(36) "Remediation Standard Regulations" or "RSRs" shall mean Regulations of Connecticut State Agencies (RCSA) Sections 22a-133K-1 through 22a-133k-3.

(37) "Roll-off Container" shall mean a container that meets the criteria specified by the

U.S. Department of Transportation that is a minimum of ten (10) cubic yards to a maximum of seventy (70) cubic yards in size and into which is placed waste or other material that is solid or semi-solid, but not liquid. Roll-off containers are designed to be transported on vehicles specifically designed to load and off-load the container. Roll-off Storage Area is shown on Figure II-2, Facility layout and as specified in Section II of this Permit.

(38) "Scrap Metal" shall mean bits and pieces of metal parts (e.g., bars, turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering which when worn or superfluous can be recycled.

(39) "Site" means the same or geographically contiguous property which may be divided by public or private right-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way that he controls and to which the public does not have access, is also considered part of the site property.

(40) "Staging Area" shall mean the entire staging area located in HWSB-562 along with any structures and other appurtenances as shown on Figure II-2 and as specified in Section II (A) of this Permit.

(41) "Storage" shall mean the holding or accumulating of waste or other materials for a temporary period of time in accordance with this Permit.

(42) "Sufficiently impervious" means:

(a) Free of gaps, cracks and areas of bare earth;
(b) Capable of containing any waste or other material that may be accidentally or otherwise released such that any such waste or other material released does not migrate or seep from or through the secondary containment system into the environment;
(c) Compatible with any waste or other material that may be accidentally or otherwise released into the secondary containment system;
(d) If necessary, coated with a material resistant to weathering or damage such that any waste or other material that may be accidentally or otherwise released into the secondary containment system does not migrate or seep from or through the secondary containment system into the environment; and
(e) Free of floor or other drains, catch basins or similar structures that would allow waste or other material to be released into the environment.

(43) "Truck Parking Transfer Area" shall mean two truck parking bays along with a loading and unloading area, structures and other appurtenances as shown on Figure II-2 and as specified in Section II (A) of this Permit.

(44) "Truck Yard" shall mean the entire fenced-in area adjacent to HWSB-562 and structures and other appurtenances as shown on Figure II-2 and as specified in

Section II (A) of this Permit.

(45) "Universal waste" shall mean the wastes (batteries, pesticides, mercury-containing equipment and lamps) covered under 40 CFR Part 273, and used electronics specified in RCSA Section 22a-449(c)-113(b)(4).

(46) "Used Oil" shall mean any oil refined from crude oil or synthetic oil, that: (A) has been used and as a result of such use is contaminated by physical or chemical impurities; or (B) is no longer suitable for the services for which it was manufactured due to the presence of impurities or a loss of original properties.

(47) "Wastes" shall mean "hazardous wastes," "CR02," "CR03," "CR04," and "CR05," wastes, "non-hazardous wastes," "Used Oil," "Scrap Metal," "Universal Waste," and all waste which after treatment at the Facility, no longer exhibits the characteristic of a hazardous waste and can be land disposed under 40 CFR Part 268.

(48) "Waste Management Units" or "Waste Management Areas" unless specifically limited by this Permit or unless the context unequivocally indicates otherwise (e.g., that reference is being made to only one and not both areas), shall mean all of the waste management units at the Permittee's Facility, including the (1) HWSB-562 (Container Storage Bays, Staging Area and the Process Work Room Area); (2) the Truck Parking Transfer Area; and (3) the Truck Yard. Waste Management Areas shall include all land used for, and any structure, other appurtenances, secondary containment areas, area(s) on the property such as a road or path that is used for the transportation, movement, or temporary storage/staging of hazardous wastes on the property of the Facility, and improvements in such areas.

SECTION II

PERMITTED ACTIVITIES
RCRA PART B PERMIT RENEWAL

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

SECTION II
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PERMITTED ACTIVITIES

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SECTION II
PERMITTED ACTIVITIES

This Permit authorizes only those activities that are explicitly provided for in this Permit. As used in this Permit, the terms "management" or "storage" shall not be construed to authorize any activity that is not explicitly authorized by this Permit.

(A) WASTE MANAGEMENT UNITS. This Permit authorizes the Permittee to store and manage hazardous waste and other materials in Hazardous Waste Storage Building 562 ("HWSB-562"), adjacent Truck Parking Transfer Area and Truck Yard as described herein. Figure II-2, identifies the location of the Permitted Waste Management Areas.

(1) Hazardous Waste Storage Building 562 ("HWSB-562")

(i) Authorized Activity. The Permittee shall operate, maintain and repair HWSB-562 in conformance with its permit application (Application Number 201903839) submitted on March 8, 2019, and as revised, and the requirements of this Permit. In the event of a conflict between the Permittee's application and the requirements of this permit, the requirements of this permit shall take precedence and apply. HWSB-562 shall contain: (a) nine (9) container storage bays; (b) staging area; and (c) a process work room for volume reduction treatment activities such as an oil filter crusher, mercuric nitrate reclamation unit and aerosol can puncturer.

(ii) Permitted Capacity

(a) The Permittee shall ensure that, at any one time, the total volumetric storage capacity of all the containers in HWSB-562 storage area shall not exceed a combined total of 32,835 gallons of RCRA and Non-RCRA wastes.

(b) The Permittee may place containerized waste in the staging area (Up to 3,718 gallons) as long as the total combined volumetric capacity of 32,835 gallons is not exceeded.

For purposes of determining compliance with the volume capacity limit, each container in this area shall be assumed full.

(iii) Secondary Containment. The Permittee shall ensure that HWSB-562 has secondary containment volume sufficient to hold at least 10 percent of the total permitted volume of all the wastes or 100 percent of the largest container, whichever is greater.

The Permittee shall ensure that the concrete floor of HWSB-562 is coated with a chemical resistant material.

(iv) Permitted Wastes and Other Materials. In addition to the Specific Prohibitions specified in Section II (B)(1) below, the Permittee shall not place within or allow any waste any container with a waste other than those wastes types described in Section II (B)(2) in the container storage bays, staging area, loading/unloading area, and process work room.

(1)(a) Container Storage Bays within HWSB-562

(i) Authorized Activity. The Permittee is authorized to store containers of wastes or other materials in the nine (9) container storage bays within the HWSB-562.

(ii) Permitted Capacity. The permitted maximum allowable volumetric capacities for the nine (9) container storage bays is as identified in Table II-1, Container Storage Bays in Building 562 (HWSB-562), Permitted Capacities.

For purposes of determining compliance with the volume capacity limit, each container in this area shall be assumed full.

(iii) Secondary Containment

(A) The Permittee shall ensure that each container storage bay has a secondary containment volume sufficient to hold at least 10 percent of the total permitted volume of all the wastes in each storage bay or 100 percent of the largest container, whichever is greater.

(B) The Permittee shall ensure that the container storage bay secondary containment is equipped with a drainage trench around the perimeter of the area.

(iv) Permitted Wastes and Other Materials. Provided it is not otherwise prohibited by this Permit, the Permittee shall not bring to, place within or allow in the container storage bays any waste or other material other than those waste codes identified in Section II (B).

(v) Prohibited Wastes. The Permittee shall not allow in the Loading/Unloading area any wastes or other materials that are specifically prohibited by this permit in Section II (B) (1), Specific Prohibition, to be brought to, placed within or to enter the loading/unloading area.

(1)(b) Staging Area within HWSB-562

(i) Authorized Activity. The Permittee is authorized to stage containers in the two (2) 8 foot wide loading docks and one (1) 8 foot wide entranceway.

(ii) Permitted Capacity. The Permittee shall ensure that at any one time, the total volumetric storage capacity of the staging area shall not exceed a combined total of 3,718 gallons.

(iii) Secondary Containment. The Permittee shall ensure that the secondary containment of the staging area has a concrete base coated with an epoxy resin which is resistant to acids and alkalines.

(iv) Permitted Wastes and Other Materials. The Permittee shall not place, store, treat, mix, bulk, dispose of, or engage in the management of any waste, other material or product in the staging area other than permitted compatible wastes listed in Section II (B) (2), to be staged for no greater than five (5) calendar days.

(v) Prohibited Wastes. The Permittee shall not allow any of the wastes, other materials or products specifically prohibited by this permit in Section II (B) (1), Specific Prohibitions, to be brought to or be placed within the staging areas.

(1)(c) Process Work Room Area within HWSB-562

(i) Authorized Activities. The Permitted is authorized to conduct volume reduction treatment activities in the process room located within HWSB-562 permitted management area. The authorized volume reduction treatment activities are an Oil Filter Crusher, a Mercuric Nitrate Reclamation Unit, and an Aerosol Can Puncturer. The Process Room location is shown on Figure II-2, Building 562 (HWSB-562). At a minimum, the Permittee shall ensure that the volume reduction treatment activities are conducted with the following equipment or its equivalent:

(A) Oil Filter Crusher. The Permittee shall ensure that oil filters are crushed with an Oberg International Model P-200L Heavy Duty Truck Filter Crusher Unit or its equivalent. Such crushing shall be conducted in accordance with the protocol listed in the Operating Records for the facility for such a unit.

(B) Mercuric Nitrate Reclamation Unit. The Permittee shall ensure that mercury-contaminated waste is filtered through a mercury ion exchange cartridge system or its equivalent to reduce the volume of mercury-contaminated waste. Such activity shall be conducted in accordance with the protocol listed in the Operating Records for the facility for such a unit.

(C) Aerosol Can Puncturer. The Permittee shall ensure that compressed gases from aerosol cans are removed with an AEROSOLV Treatment Unit or its equivalent. Such removal shall be conducted in accordance

with the protocol listed in the Operating Records for the facility for such a unit.

(ii) Secondary Containment. The Permittee shall ensure that the concrete floor of the Process Work Room Area is in good condition at all times and it is coated with a chemical resistant material to acids and alkalines. The perimeter of the process work room area shall be equipped with floor drainage trenches.

(iii) Permitted Capacity. The Permittee shall ensure that either one 30-gallon container or one 55-gallon container per treatment activity is utilized at any one time.

(iv) Permitted Wastes and other Materials. The Permittee shall not place, store, treat, mix, bulk, dispose of, or engage in the management of any waste, other material or product in the Process Work Room Area within HWSB-56 other than the permitted wastes and other material listed in Table II-2, Process Room Permitted Activities and Wastes.

(2) Truck Parking Transfer Area

(i) Authorized Activity. The Permittee is authorized to park two (2) trucks in the parking transfer Area at the permitted area of the facility.

(ii) Permitted Capacity. The Permittee shall maintain two (2) open truck pads located in the truck parking transfer area to load and unload containerized wastes from the permitted facility.

(iii) Secondary Containment. The Permittee shall ensure that the truck parking transfer area has a loading/unloading dock entranceway with a concrete floor base and such a base is sloped towards HWSB-562 to minimize any spill runoff.

(iv) Permitted Wastes and other Materials. The Permittee shall not place, store, treat, mix, bulk, dispose of, or engage in the management of any waste, other material or product in the Loading/Unloading Area of the truck parking transfer area other than the permitted wastes and other material listed in Section II (B) (2).

(v) Prohibited Wastes. The Permittee shall not allow in the Loading/Unloading area any wastes or other materials that are specifically prohibited by this permit in Section II (B) (1), Specific Prohibition, to be brought to, placed within or to enter the loading/unloading area.

(3) Truck Yard

(i) Authorized Activity. The Permittee is authorized to transfer, store, bulk or engage in the management of waste in the Truck Yard of the Facility.

(ii) Permitted Activities. The Permittee may transfer, store, bulk or engage in the management of waste which has been stored for less than ninety (90) days in any of six (6) self-contained storage modules. The Truck Yard location is shown on Figure II-2, Layout of Building 562.

(4) Miscellaneous Activities

(4)(a) On-Site Storage of Lead Acid Battery Recycling Area

(i) Authorized Activity. The Permittee is authorized to operate, maintain and repair a Lead Acid Battery Recycling Storage Area at the Facility.

(ii) Permitted Wastes. The Permittee shall store only lead acid batteries (i.e., automotive, heavy equipment) in a storage module located in the truck yard. The lead acid battery recovery operation is limited to on-site storage only.

(iii) Secondary Containment. Secondary containment for the Lead Acid Battery Recovery shall be provided in this area by means of the storage module floor. Run-on into this area is prevented by the walls and roof.

(4)(b) Hazardous Materials Minimization Center (HAZMINCEN)

(i) Authorized Activity. The Permittee is authorized to manage a Hazardous Materials Minimization Center (HAZMINCEN) in Building 561 adjacent to HWSB-562 to provide life cycle management of hazardous materials for the purpose of reducing the generation of hazardous wastes by the Permittee.

(ii) Permitted Wastes. The Permittee is authorized to place and consolidate in the HAZMINCEN hazardous materials to be used or reused at the facility.

(B) CHEMICAL MANAGEMENT

(1) Specific Prohibitions. The Permittee shall not allow any of the following hazardous wastes, other materials or products to be brought to, processed or be managed anywhere within the Permitted Facility.

(a) Infectious materials, as defined in 49 CFR 173.134 (DOT Class 6);

(b) Materials that are Poison by Inhalation, as defined in 49 CFR 173.115, 173.132 and/or 173.133;
(c) Radioactive materials, as defined in 49 CFR 173.403 (DOT Class 7);
(d) Cryogenic liquids, as defined in 49 CFR 173.115(g);
(e) Any forbidden hazardous material identified in 49 CFR 173.21 and 173.54;
(f) Materials that are pyrophoric or ignite spontaneously;
(g) Listed and characteristic wastes with a Reactivity Hazard rating of 4, as defined by the NFPA 704, Degree of Hazard Criteria, most recent edition;
(h) Listed and Characteristic wastes with a Health Hazard rating of 4; as defined by the NFPA 704, Degree of Hazard Criteria, most recent edition. Note: The degree of hazard for specific chemicals specified in this Section II (B) (1) (h) shall be found in NFPA 325 M and NFPA 49 or the equivalent in the HMIS system.
(i) Shock sensitive materials, defined as materials that are readily capable of detonation or explosive decomposition or reaction at normal temperatures and pressures, and materials sensitive to mechanical or localized thermal shock at normal temperatures and pressures, including materials designated by the NFPA 704 as having a Reactivity Hazard Rating of 4.
(j) Special Hazards: The limits identified below are maximum storage quantities of the combined total of both liquid and solid wastes present at the Permittee's waste storage management unit(s). These limitations apply per area.

(i) Liquid and Solid Oxidizing Materials, as defined in NFPA 43A;
Class 2 oxidizers shall not be stored in excess of 10,000 pounds,
Class 3 oxidizers shall not be stored in excess of 5,000 pounds,
Class 4 oxidizers are prohibited;

(ii) Organic Peroxide Formulations, as defined in NFPA 43B;
Class I Organic Peroxides, are prohibited
Class II Organic Peroxides, are prohibited
Class III Organic Peroxides shall not be stored in excess of 1,500 pounds, and
Class IV Organic Peroxides shall not be stored in excess of 10,000 pounds.

(iii) Gaseous Oxidizers, as defined in NFPA 55 (formerly NFPA 43C).

(iv) Spontaneously Combustible Materials, as defined in 49 CFR 173.124(b) as long as the amount does not exceed 10 pounds and shall be stored in a flammable storage locker in Container Storage Bay No. 117; and

(v) Dangerous When wet Materials, as defined in 49 CFR 173.24(c) as long as the amount does not exceed 10 pounds and shall be stored in a flammable storage locker in Container Storage Bay No. 119.

(k) Liquids, or waste or other materials that contain liquids, in roll-off containers. This Prohibition, however, does not apply to liquids that may have settled during transportation, provided that liquids that have settled during transportation shall be limited to liquids present in a separate distinct phase that do not occupy not more than one inch in a container.

The Specific Prohibitions in Section II (B) (1) of this Permit do not apply to the products or materials used by the Permittee in its laboratory or for maintenance at its property, provided such products or materials are present in quantities no greater than that necessary for use by the Permittee.

(2) **Permitted Wastes**. In addition to the Specific Waste Prohibitions specified in Section II (B) (1), the Permittee shall not place or allow to be placed in the Waste Management Areas any waste other than the waste type listed below.

(a) The following hazardous wastes, identified by the EPA hazardous waste identification code(s) are permitted for storage in the waste storage and management areas described in Section II (A) providing the Permittee first complies with Sections II (B)(3)(a) and II (B)(3)(b):

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043;

F001, F002, F003, F004, F005 F027;

P001, P030, P042, P075, P081;

U002, U003, U019, U021, U028, U031, U032, U037, U039, U041, U043, U044, U045, U052, U061, U068, U069, U072, U075, U079, U080, U103, U112, U117, U121, U122, U129, U133, U134**,** U135, U145, U151, U154, U159, U161, U162, U165, U186, U188, U204, U210, U211, U220, U223, U226, U227, U228, U239, U248, and U359

(b) Universal waste as defined in RCSA Section 22a-449(c)-113. These wastes are batteries, mercury containing equipment, lamps, used electronics and pesticides.

(c) Non-RCRA hazardous (Connecticut Regulated Wastes) as defined under CGS Section 22a-448. These wastes are:

(i) Waste PCBs, waste code CR01.
(ii) Waste oil, waste code CR02
(iii) Waste water soluble oil, waste code CR03
(iv) Waste chemical liquids, waste code CR04

(v) Waste chemical solids, waste code CR05

(d) Used Oil as defined in RCSA Section 22a-449(c)-119.

(e) Other materials (e.g., commercial chemicals from technical, analytical reagent, grade chemicals, chemical intermediates, products, non-hazardous wastes and any chemical mixture), except where otherwise prohibited by this permit, (e.g., shock sensitive materials) may be treated, stored, processed and managed in the waste storage and management areas.

(3) <u>Permitted Waste Management</u>

(a) The Permittee may store and manage wastes and other materials (e.g., commercial chemicals from technical, analytical reagent, grade chemicals, chemicals intermediates, products, non-hazardous wastes and any chemical mixture), except where otherwise prohibited by this permit (e.g., shock sensitive materials) in the permitted waste storage management unit(s) providing that the Permittee first complies with the conditions listed in Section II (B) (3) (b) below.

(b) Prior to placing into the permitted waste storage and management unit(s) any hazardous wastes or other materials, the Permittee shall determine that the materials can be properly managed in accordance with the terms and conditions of this permit. At a minimum, the Permittee shall:

(i) Demonstrate that each hazardous waste or other material is not specifically prohibited by Section II (B) (1) and the applicable degree of hazard as defined in the Waste Analysis Plan, incorporated herein as Attachment A of this permit, has been determined for each hazardous waste or other material.

(ii) Characterize each hazardous waste or other material for those parameters specified in the Waste Analysis Plan.

(iii) Verify, using the procedures specified in the Waste Analysis Plan, incorporated herein Attachment A, that each hazardous waste or other material is compatible with all co-stored materials.

(iv) Demonstrate that each hazardous waste or other material is being stored in an appropriate container as required by Section III, at a minimum, identify through review of available data, that container is compatible with the stored waste or other material.

(v) Demonstrate that each hazardous waste or other material is compatible with the containment structure or other device as required by Section III by, at a minimum, identifying through review of available data (e.g., manufacturer's specifications), that

the waste or other material is compatible with the coating used on the containment structure.

(vi) Demonstrate that the contingency plan adequately addresses all potential hazards posed by each hazardous waste or other material, specifically considering the suitability and compatibility of this material with protective clothing (e.g., boots, gloves, suits, etc.), availability of appropriate respirator protection and emergency response equipment, monitoring equipment (explosion detection equipment, vapor analyzers, dragger tubes, etc.) and other relevant equipment and includes necessary response procedures by, at a minimum, identifying PPE required to properly handle the waste and other material, and identifying the appropriate response procedures for handling incidents involving the waste or other material and incorporating the above in the contingency plan.

(vii) Maintain a database or equivalent for each hazardous waste or other material approved for storage or management to be located with all necessary reference material as indicated in the contingency plan. Such database shall be used in the event of an incident requiring the implementation of that plan.

(c) The information used to make the demonstrations required by Section II (B)(3)(b)(ii) shall be clearly documented and maintained in the operating record until final closure of the Facility.

(d) The Permittee shall store and manage universal wastes in accordance with RCSA Section 22a-449(c)-113.

(e) The Permittee shall store and manage Non-RCRA wastes under CGS Section 22a-448. Specifically, Non-RCRA waste codes CR01, CR02, CR03, CR04 and CR05.

(f) The Permittee shall store and manage used oil in accordance with RCSA Section 22a-449(c)-119.

TABLE II-1
CONTAINER STORAGE BAYS IN BUILDING 562 (HWSB-562)
PERMITTED CAPACITIES

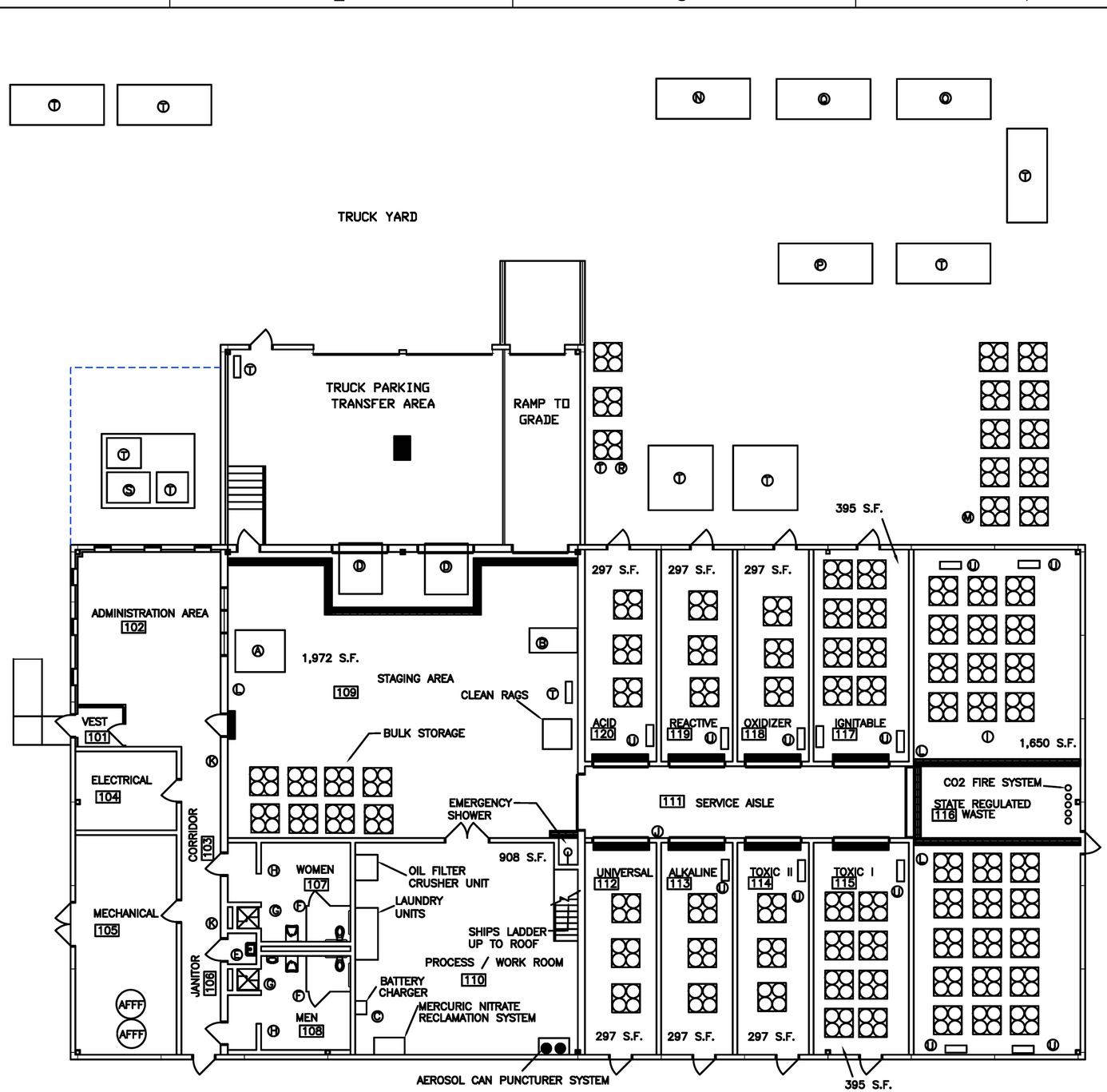
WASTE GROUP	STORAGE BAY NUMBER	MAXIMUM NUMBER OF CONTAINERS (55-gallon cap.)[1]	MAXIMUM WASTE STORAGE CAPACITY	Waste Codes
Universal	112	20	**1100** gallons	D002, D004-D043
Alkaline	113	20	**1145** gallons	D002, D004-D043 F001, F002, F003, F004, F005, F027
Toxic	114 and 115	120	**6,645** gallons (FOR BOTH BAYS)	D004-D043 F001, F002, F004, F005, F027, P001, P075, P030, P042, P081, U003 U021, U028, U032, U037, U039, U041, U043, U044, U052, U061, U068, U069, U072, U075, U079, U080, U103, U117, U121, U122, U129, U135, U145, U151, U161, U162, U165, U188, U204, U210, U211, U213, U220, U226, U227, U228, U248, U359
Connecticut Regulated	116[2]	336	**18,660** gallons	CR01, CR02, CR03, CR04, CR05
Ignitable	117	32	**1,865** gallons	D001, D002, D004-D043, F001-F005, F027, U002, U003, U019, U031, U045, U112, U117, U154, U159, U161, U162, U186, U239
Oxidizer	118	20	**1,145** gallons	D001, D002, D004-D043 F001, F002, F004. F005, F027
Reactive	119	20	**1,130** gallons	D003, F001-F005, P042, U133, U162, U223
Acids	120	20	**1,145** gallons	D002, D004-D043, F001, F002, F003, F004, F005, F027, U134, U162
Total Capacity			**32,835 gal**	

[1]Or any size combination as long as the total volumetric capacity does not exceed the maximum bay storage capacity.
[2] Both RCRA and non-RCRA wastes may be stored in Storage Bay 116.

TABLE II-2

PROCESS ROOM PERMITTED ACTIVITIES AND WASTES

TREATMENT PROCESS	WASTE TYPES	WASTE CODES
Aerosol Can Puncturer	Chemical Liquids	All TCLP codes could be included (except pesticides and herbicides)
Mercuric Nitrate Reclamation Unit	Mercury-contaminated waste	All TCLP codes could be included (except pesticides and herbicides)
Oil Filters Crusher	Oil Filters	N/A



NORTH

EQUIPMENT LIST

- (A) DIGITAL FLOOR SCALE
- (B) FORKLIFT TRUCK EXPLOSION PROOF
- (C) BATTERY CHARGING STATION
- (D) TYPICAL 8' DOCK LEVELERS
- (E) SERVICE / MOP SINK
- (F) HANDICAP SINK
- (G) 36" x 36" SHOWER
- (H) METAL WARDROBE LOCKERS
- (I) TYPICAL 55 GALLON DRUMS ON PALLETS
- (J) TYPICAL TRENCH DRAIN FOR SPILL CONTAINMENT
- (K) 10 LB. ABC DRY CHEMICAL FIRE EXTINGUISHER IN WALL CABINETS IN MASONRY WALL
- (L) 20 LB. ABC DRY CHEMICAL FIRE EXTINGUISHER IN WALL CABINETS IN MASONRY WALL
- (M) NEW 55 GALLON CONTAINERS (OPEN & BUNG TOP) CONTAINER STORAGE AREA
- (N) UNKNOWN WASTE STORAGE UNIT (AWAITING ANALYSIS)
- (O) HAZARDOUS WASTE STORAGE UNIT
- (P) UNIVERSAL WASTE STORAGE UNIT (BATTERIES)
- (Q) USED OIL RECYCLING STORAGE UNIT
- (R) OVERPACK STORAGE AREA
- (S) EMPTY DRUM CONTAINMENT
- (T) GENERAL SUPPLIES
- (U) STORAGE CABINETS

115 ROOM NUMBER

DRAINAGE TRENCH

PROPOSED BUILDING ADDITION (OFFICE/ADMININSTRATION AREA)

0 8 16 24
SCALE IN FEET

CAUTION: IF SHEET IS LESS THAN 34"x22" USE GRAPHIC SCALE

NAVFAC

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
NAVAL STATION NEWPORT

NAVAL FACILITIES ENGINEERING COMMAND MID-ATLANTIC
MIDDLEBURG/NEWPORT, RHODE ISLAND

NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT

BUILDING 562 LAYOUT

SCALE: 1/8" = 1'-0"

SECTION III

OPERATING CONDITIONS
RCRA PART B PERMIT RENEWAL

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

SECTION III
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OPERATING CONDITIONS

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SECTION III
OPERATING CONDITIONS

(A) OPERATING CONDITIONS APPLICABLE TO ALL PERMITTED ACTIVITIES

(1) The Permittee shall ensure that all waste or other materials at the Facility are handled or managed by personnel who have completed all of the required training specified in the Personnel Training Plan, incorporated herein as Attachment C to this Permit.

(2) The Permittee shall ensure that the receipt and/or transfer of containerized waste or other materials is performed by appropriately trained personnel, experienced in the use of such equipment and techniques, as specified in the Personnel Training Plan, incorporated herein as Attachment C to this Permit.

(3) The Permittee shall, at all times, provide a safe working environment for employees at the Facility. At a minimum, the Permittee shall ensure that :

(i) There is adequate ventilation at each Waste Management Area; and
(ii) Whenever Facility personnel may be exposed to wastes or other materials, appropriate protective equipment is utilized, as specified by, but not be limited to, the Safety Data Sheets (SDSs, formerly known as MSDSs), or by the National Institute for Occupational Safety and Health (NIOSH).

(4) The Permittee shall ensure that the following requirements are met when managing organic peroxides:

(i) The chemical name is posted on the container or unit utilized to manage the organic peroxide, and
(ii) The material is managed in a well-ventilated separated/closed area and kept as cool as possible to minimize any fire or explosion hazard.

(5) The Permittee shall ensure that the following requirements are met when managing oxidizers:

(i) Oxidizers shall only be stored in HWSB-652 storage bay 118, and
(ii) The chemical name shall be posted on the corresponding container or unit utilized to manage the oxidizing material, as well as maintain them in a well-ventilated separated/closed area and kept as cool as possible to minimize any fires or explosion hazard.

(6) At the time of waste receipt and when preparing shipment for off-site disposal, bulk shipment of hazardous waste shall be inspected to ensure that the waste identification information corresponds with and identifies the waste expected to be received or shipped off-site, and that the manifests and/or other required documentation is complete.

(7) The Permittee shall ensure that the secondary containment systems for the Waste Management Areas comply with the applicable requirements of 40 CFR 264.175 and 40 CFR 264.193.

Base and Berm Requirements for Secondary Containment Systems

(8) The Permittee shall ensure that the base and berm of the secondary containment in each waste management area is free of cracks or gaps and is sealed with a chemical resistant, impermeable coating compatible with all waste or other material, in such waste management area such that the secondary containment system will contain leaks, spills or other liquids, including, but not limited to, precipitation. At a minimum:

(a) The application of a chemical resistant impermeable coating shall be in conformance with the manufacturer's specification. Prior to applying the coating, the Permittee shall inspect the Waste Management Area(s). If visible residue or any other material that could affect the performance of the coating if found, the residue and material shall be removed in accordance with Section III (A)(9) of this Permit; and

(b) When there are gaps or cracks, in a secondary containment system or a Waste Management Area's coating is in need of repair or application, the Permittee shall follow the procedures in Section III (A) (9), (A) (10), (A) (11) and (A) (12) of this Permit.

(9) Whenever the integrity of a Waste Management Area's base, berm or coating specified in Section (A) (8) of this Permit is impaired or in need of repair or re-application, the Permittee shall:

(a) Remove all waste and other materials from the Waste Management Area or affected portion thereof, as necessary;

(b) Inspect the area for the presence of visible residue (stains, debris, wetness), and if visible residue is found, remove the residue by scrubbing and washing, and/or scarifying as necessary. When removing residue, the Permittee shall only use materials that are standard in the industry for such purpose.

(c) Determine the nature and extent of the impairment;

(d) Repair the affected area, or repair and/or reapply the coating of the affected area as soon as possible, but not later than thirty (30) calendar days after the Permittee discovers that the integrity of the area or of the coating has been impaired or is in of repair; except that if repairs to a Waste Management Area located outdoors cannot be completed in thirty (30) calendar days, the Permittee shall provide "alternate" secondary containment (e.g., containment pallets or a a temporary liner such as a catch basin mat) for all waste or other materials in the affected area until the necessary repairs have been completed.

A record of this alternate secondary containment measure, the extent of impairment noted and the reason for and length of delay in re-application of coating shall be made and maintained in the Operating Record until Final Closure of the Facility.

(10) The Permittee shall not use or place waste or other materials in a Waste Management Area, or any portion thereof, in which the integrity of the secondary containment is impaired or under repair. If only a portion of the secondary containment in a Waste Management Area is impaired or in need of repair or coating reapplication, the Permittee may continue to use other portions of the same Waste Management Area provided that:

(a) The secondary containment in these other portions is not impaired, or in need of repair or coating reapplication; and

(b) Before the Permittee uses any portion of the Waste Management Area, the Permittee shall take all the necessary measures to ensure that waste or other material does not or cannot migrate to any portion of the Waste Management Area where the secondary containment is impaired or is in need of repair or coating reapplication.

(11) When the integrity of the secondary containment system of a Waste Management Area is impaired or has been repaired or coating reapplied, the Permittee shall record in the Operating Record for the Facility the following information, to be kept until Final Closure of the Facility:

(a) The location of the waste management area requiring repair or coating reapplication;
(b) The type and degree of repair or coating reapplication needed;
(c) The method(s) of repair or reapplication;
(d) The date the need for the repair or coating reapplication was noticed;
(e) The date(s) all repair(s) were made or coating(s) reapplied; and
(f) The name, title and identity of the person who determined that the repair or coating reapplication was sufficient to allow the waste management area or portion thereof to be used again and the date of such inspection and any comments of the inspector regarding the repair or coating reapplication.

(12) Before resuming use of a waste management area requiring repair or reapplication of a coating, the Permittee shall ensure that the area is free of cracks or gaps and the area's coating is sufficiently impervious to contain leaks and/or spills, including inspection of the berm and base of the waste management area to ensure the integrity of the coating.

Markings

(13) The Permittee shall ensure that each container with hazardous waste, including a roll-off container, is labeled or marked clearly with the words "Hazardous Waste" and

other words that identify the contents of each container, such as "flammable," "acid," "alkaline," "cyanide," 'reactive," "halogenated solvent," or the chemical name of the contents of the container.

(14) The Permittee shall post fixed markings or signs in each waste storage area clearly designating the location of each group of wastes or other materials being managed as appropriate. Each sign or marking shall be secure, legible and clearly visible from a distance of twenty-five (25) feet.

(15) Prior to changing a waste compatibility type designation managed in HWSB-562 Bay Areas, the Permittee shall:

(i) Remove all hazardous waste and other materials from that area;
(ii) Inspect the area for the presence of visible residue;
(iii) If visible residue is found, remove the residue by scrubbing and washing with the appropriate cleaning solutions;
(iv) Post a new sign or signs for that waste storage area as applicable;
(v) Revise as necessary Table II-1, Container Storage Bays in Building 562 (HWSB-562) Permitted Capacities, included in Section II of this Permit, and
(vi) Record the following information in the Operating Record for the Facility:
(a) The name and title of the person inspecting the Area after the removal of all waste and other materials.
(b) The date and results of the inspection of the Area, and any action taken as result of the inspection.
(c) The name and title of the person, who, after inspection, determined that the Area can be re-designated and used for a different type of waste or other material and the date of this inspection; and
(d) The change in type of waste stored in the Area, including the previous and new waste.

Inspections

(16) The Permittee shall inspect the Facility, each Waste Management Area, and all safety equipment, emergency response equipment, security devices and operating and structural equipment to prevent releases and to ensure such equipment remains in good working order for the safer operation of the Facility and compliance with this Permit. At a minimum, the Permittee shall perform inspections in accordance with the Inspection Plan, incorporated herein as Attachment B to this Permit. The Permittee shall respond as soon as possible to any problem or deficiency identified by any such inspection.

(17) The Permittee shall record inspections of each Waste Management Area in an inspection log. This log shall include the date and time of the inspection, the name of the inspector, company affiliation, a notation of the observations made, and the date and nature of any repairs or required actions.

(18) The Permittee shall ensure that inspection records (on the forms required by the Inspection Plan) are maintained in the SUBASENLON Facility Operating Records

for at least three (3) years.

(19) Prior to placing any container of hazardous waste or other materials into the waste storage and management areas, the container shall be visually inspected by the facility technical personnel or his/her designee (e.g., materials handler) to ensure that the waste container is properly labeled. If a discrepancy is found, this information shall be reported to an immediate supervisor or an appropriate supervisor prior to further processing of the material. If an immediate response is not possible, the container may be kept in the staging area on secondary containment for up to twelve (12) hours pending resolution of the problem.

Spills, Releases and Accumulated Liquids

(20) The Permittee shall operate the Facility in a manner that minimizes the possibility of spills or releases of waste or other materials. The Permittee shall manage and maintain the waste storage and management areas within the Facility so as to prevent run-on into such area, and prevent spills, releases of accumulated liquids from escaping a waste management area.

(21) The Permittee shall remove any spilled or leaked material (waste or any liquid), including precipitation, that accumulates in any waste storage and management area(s) or any containment area (including any secondary containment). The Permittee shall remove such material immediately upon detection, but, in no event later than twenty-four (24) hours from the time such material should have been discovered with the exception of precipitation events as described in this paragraph. The Permittee shall ensure that any such spillage or leakage of material remains within the secondary containment area of a waste management area. Notwithstanding the foregoing, except for the potential receipt of waste or other materials from an emergency event, if the Facility is closed on a Saturday, Sunday or a federal holiday that is observed by SUBASENLON, any precipitation that accumulates during this time period in the waste management area(s), including secondary containment area(s), the Permittee shall have until the end of the next business day when the facility is open to remove such precipitation.

To the extent that any term or condition of this Permit is deemed to be less stringent than any other Permit issued to the Facility, including but not limited to the General Permit for the Discharge of Stormwater Associated with Industrial Activity, the more stringent term or condition shall control and remains enforceable.

(22) The Permittee shall manage all spilled or leaked waste or any liquid, including, but not limited to, precipitation, removed from a waste management area(s) as a hazardous waste, unless the Permittee demonstrates that such waste or liquid is not a hazardous waste pursuant to 40 CFR 262.11 (Hazardous Waste Determination). If not required to be managed as a hazardous waste, the Permittee shall manage all such waste or liquid in accordance with this Permit or the General Permit for the Discharge of Stormwater Associated with Industrial Activity and all applicable requirements.

Notifications/Reports

(23) (a) The Permittee shall immediately notify the Commissioner using CT DEEP's Emergency Response & Spill Prevention Division (ERSPD) 24-hour telephone number 860-424-3338 or, if that number is unavailable, at 860-424-3333 or toll free at 1-866-337-7745, of:

(i) Any spills or release to the environment at the Facility required under 22a-450 of the CGS; or
(ii) Any emergency evacuation of the Facility for any purpose.

(b) The Permittee shall immediately notify the Director of the Waste Engineering and Enforcement Division (WEED) by email at DEEP.WEEDNotification@ct.gov of:

(i) Any partial shutdown of the Facility that substantially disrupts normal operations for more than twenty-four (24) hours; or
(ii) Any significant threat to human health or the environment.

(c) In addition to the provisions of Section III (A)(24)(a) of this Permit, the Permittee shall comply with all other applicable reporting or notification requirements regarding any spill or release at the Facility, including but not limited to, requirements under section 22a-450 of the CGS and 40 CFR Part 302.

(24) (a) In addition, to any other information that may be required by the ERSPD, within fifteen (15) calendar days of a spill or release at the Facility, the Permittee shall submit a written report containing the following information to the Director of WEED:

(i) Likely route of migration of the spill or release;

(ii) Characteristics of the surrounding soil (soil composition, geology, hydrogeology, etc.);

(iii) Results of any monitoring or sampling conducted in connection with the spill or release (if available). If sampling or monitoring data relating to the spill or release are not available within fifteen (15) calendar days, such data shall be submitted to ERSPD and WEED as soon as they become available.

(iv) Proximity to down gradient drinking water wells, surface water, populated areas, wetlands or other environmentally sensitive areas, and habitat for endangered or threatened species; and

(v) Description of all response actions taken or planned.

(b) The Permittee shall maintain on-site copies of all spills reports required under this Permit and all subsequent reports filed with the Department regarding each such incident in the Facility's Operating Record until Final Closure of the Facility.

Commingling

(25) Prior to the bulking or other commingling of hazardous wastes and other materials within the waste management areas, the Permittee shall assure compliance with all applicable sections of the Waste Analysis Plan ("WAP"), incorporated herein as Attachment A.

(26) For each bulking or other commingling of hazardous wastes and other materials within the waste storage and management areas, the Permittee shall ensure that prior to any bulking or other commingling taking place all necessary information accompanies the waste and contains at a minimum the following information:

(a) The information which can be utilized to track the material being bulked/commingled;
(b) U.S. EPA waste code(s), as applicable;
(c) Facility treatment, storage or management area/unit to and from which the waste is to be transferred;
(d) Quantity of material to be bulked and/or commingled; and
(e) Signature, initials, or other means of identification of the site technical personnel who has authorized the bulking/commingling and verified waste compatibility.

(27) The Permittee shall not mix or commingle an incompatible waste as specified in 40 CFR Part 264, Appendix V. In addition, the Permittee shall not place an incompatible waste in a container that has not been decontaminated and that previously held an incompatible waste, product or other material.

(28) The Permittee shall ensure that at all times the storage of hazardous wastes from a given hazardous waste compatibility group be separated from materials from a different compatibility group (incompatible wastes or other materials), or protected from them by means of dike, berm, or other device.

(29) Per 40 CFR 264.17(b), the Permittee shall not manage waste or other material at the Facility in a manner which does or could:

(a) Generate extreme heat or pressure, fire, explosion or violent reaction;

(b) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health or the environment;

(c) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;

(d) Damage the structural integrity of the item used to contain such waste or other material; or

(e) Through other like means, threaten human health or the environment.

(30) The Permittee shall ensure that all areas used to store containerized waste comply with all applicable National Fire Protection Association (NFPA) Guidelines and Occupational Safety and Health (OSHA), General Industries Standards, whichever is more stringent.

Special Requirements for Ignitable Wastes

(31) In accordance with 40 CFR 264.176 and 40 CFR 270.15(c), the Permittee shall ensure that containers holding ignitable waste are located at least 15 meter (50 feet) from the Facility's property line.

(32) The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable waste at the Facility. This waste must be separated and protected from sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, chemical reactions), and radiant heat.

(33) The Permittee shall post "No Smoking" signs in conspicuous locations where ignitable waste are managed or stored at the Facility.

(34) The Permittee shall ground/bond any container, including, but not limited to, a Transportation Vehicle, of ignitable waste or other materials stored or managed in the Facility, at least during the addition and removal of waste to and from any such container.

Land ban Hazardous Wastes (LDR)

(35) The Permittee shall comply with the land disposal restrictions in 40 CFR Part 268. As part of such compliance, the Permittee shall not mix hazardous waste that does not meet the applicable treatment standard in 40 CFR Part 266, Subpart D, with debris that changes the treatment classification of such waste (i.e., from waste to hazardous debris).

(36) Except as provided in 40 CFR 268.50(d) and (e), the Permittee shall ensure that each container of hazardous wastes restricted from land disposal is subject to the following restrictions:

(a) The Permittee may store land-ban hazardous wastes solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper storage, treatment, or disposal; and

(b) Each on-site container of land-ban hazardous waste shall be clearly marked to

identify its contents and the date of initial accumulation.

Closure

(37) In addition to any requirements in Section IV of this Permit, the Permittee shall close the Facility in accordance with the Closure Plan incorporated herein as Attachment E of this Permit. When closing or partially closing the Facility, the Permittee shall demonstrate that any contaminants remaining after closure will not impact human health or any environmental media including ground water, surface water, sediments, soils, or air in excess of recommended exposure limits or factors considering all potential routes of exposure. At a minimum, the closure performance standards for each hazardous waste and other constituent of concern shall meet the remediation standards regulations, RSCA 22a-113k-1 et seq. The Permittee shall notify the Department in writing of any partial closure of the Facility at least ninety (90) days prior to the initiation of the activity and if necessary, any Department review and/or approval.

Aisle Space

(38) At all times, the Permittee shall maintain aisle space, at a minimum, of twenty-four (24) inches, between a row or pallet of containers to allow for inspections, container handling and the unobstructed movement of personnel and equipment used for emergency response, including but not limited to, fire protection, spill control and decontamination to all areas of the container waste storage and staging operations in an emergency.

(39) The maximum stacking height of palletized containers in the permitted container storage areas shall be limited to two tiers high. Oxidizer storage shall be limited to only one tier high. Non-palletized wastes or other materials shall not be stacked within management areas, exclusive of trucks containing shipments within the truck pads. Hydrogen peroxides shall be managed on non-wooden pallets.

(40) The Permittee shall transport containers of waste at the Facility using forklifts, hand trucks and/or other equipment capable of transporting such containers.

(41) The Permittee shall take all necessary measures to prevent hazardous waste in any waste management area from freezing.

(42) The Permittee shall not transport, load, unload, transfer, treat, manage or handle any waste or other materials, within, over or on any area of the Facility that has bare soil, broken asphalt or unprotected surfaces. In addition, the Permittee shall maintain all traveled surfaces (over which vehicles containing hazardous waste is moved or stored at the site in good repair so that such surfaces can withstand the mechanical stress of traffic to which they are subjected and prevent damage to containers and spillage of waste or other materials during the use of such surfaces. For purposes of this provision, asphalt shall not be considered an "unprotected surface."

Traffic Control and Vehicles Idling

(43) The Permittee shall control all traffic related to the operation of the Facility in such a way as to mitigate the queuing of vehicles and prevent excessive or unsafe traffic impacts in the area where the Facility is located.

(44) The Permittee shall prominently post and maintain signs in appropriate areas warning that trucks at the Facility cannot idle for more than three (3) consecutive minutes, pursuant to RCSA Section 22a-174-18(b)(3).

Signage

(45) The Permittee shall post a sign with the legend, "Danger – Unauthorized Personnel Keep Out," at each entrance of the Facility, and at other locations, in sufficient numbers to be seen from any approach to the Facility. The legend must be written in English and in any other language predominant in the area surrounding the Facility and shall be legible from a distance of at least twenty-five (25) feet. The Permittee may use signs with a legend other than "Danger – Unauthorized Personnel Keep Out," to comply with this provision, provided such posting otherwise meets the requirements of this provision and the legend on the sign clearly indicates that only authorized personnel are allowed to enter onto the Facility property and that entry onto the Facility property can be dangerous.

Waste Acceptance Criteria

(46) Prior to the placement of hazardous waste into a container, the Permittee shall conduct the hazardous waste characterization, verification and waste compatibility evaluation and/or testing described in the WAP incorporated herein as Attachment A.

(47) The Permittee shall manage all wastes whose identities cannot be verified in accordance with the procedures in the WAP incorporated herein as Attachment A, by placing such waste in a designated storage area.

Protocol for Receipt of Waste

(48) The Permittee shall ensure that all waste enters the permitted facility through the Truck Parking Transfer Area. Such waste shall be brought into the Staging Area, then transferred to the Container Storage Bay(s), the Process Room Area, and the Truck Yard Area or transferred directly to an outbound trailer. Notwithstanding the above, used oil and batteries may be directly transferred to the storage module, and crushed oil filters may be directly transferred to the crushed oil filter container.

(49) Prior to placing any container of waste into the Process Room, the Container Storage Bay, Truck Yard Storage Module or prior to bulking authorized waste in the Staging Area, the container shall be visually inspected by the permitted facility's trained personnel to ensure that each container of waste meets the following criteria:

(a) The Waste Analysis Profile Sheet and corresponds to the label on the container;
(b) The waste is in the appropriate container;
(c) The container is not damaged or leaking;
(d) The container is tightly closed; and,
(e) The container is accompanied by the appropriate paperwork as required by the WAP, incorporated herein as Attachment A, and any other documents that may be required by regulation or by this permit.

If any of the above conditions are not demonstrated, the Permittee shall correct the deficiency immediately. If an immediate response is not possible, the container may be kept in the Staging Area on secondary containment for up to twelve (12) hours pending resolution of the problem. Any inspection requirement during this temporary storage and cleanup requirements if necessary.

(50) For each transfer of waste to the permitted storage area, the Permittee shall perform the following:

(a) Verify that each waste stream has been characterized and that waste verification has been performed in accordance with the WAP incorporated herein as Attachment A;

(b) Utilize facility paperwork (e.g., inventory facility logs, etc.) which must be capable of tracking each movement of waste through the facility;

(c) Verify that the paperwork that accompanies the waste grants transfer authorization prior to any waste being placed within the permitted management area, at a minimum, the following information as applicable:

(i) The Container Storage Bays, the Process Room or the Truck Yard Storage Modules which the waste is to be transferred;
(ii) Quantity of waste to be transferred; and
(iii) Signature or initials of the site technical personnel who has authorized the transfer and verified waste compatibility.

(B) CONTAINER OPERATING CONDITIONS

Condition of Containers (40 CFR 264.171)

(1) If a container holding waste is not in good condition (e.g., severe rusting, apparent structural defects, bulging, etc.) or if it begins to leak, the Permittee shall transfer the waste from this container to a container that is in good condition or manage the waste in some other way that complies with this permit and all applicable statutes and regulations.

(2) The Permittee shall ensure that no container at this permitted facility has any superfluous waste liquids, sludges or solids on the exterior of such container.

Compatibility of waste with containers (40 CFR 264.172)

(3) The Permittee shall use a container made of or lined with materials, which will not react with, and are otherwise compatible with the hazardous waste to be stored, so as not to impair the ability of the container to contain the waste. Only containers that have been approved by the U.S. Department of Transportation (DOT) for use with a given hazardous waste are acceptable for storage of that waste within the permitted facility.

Management of Containers (40 CFR 264.173)

(4) (a) The Permittee shall ensure that all containers holding wastes stored or managed at the permitted facility are not opened, handled, managed or stored in a manner that may rupture the container or cause it to leak.

(b) The Permittee shall ensure that all containers holding hazardous waste are always closed during storage, except when it is necessary to add or remove waste or in an emergency where it may be necessary to repackage the waste from one container to another.

Inspections (40 CFR 264.174)

(5) The Permittee shall inspect, at least weekly, HWSB-562 in accordance with the Inspection Plan, incorporated herein as Attachment B and shall perform inspections as required by 40 CFR 264.174. At a minimum, the Permittee shall inspect for (a) leaking containers; (b) deterioration of containers; and (c) deterioration of containment system caused by corrosion or other factors.

(6) The Permittee shall visually inspect each container in HWSB-562 to ensure that each container is packaged and marked as required by 40 CFR 262.30 (Packaging – DOT Requirements) and 262.32 (Marking – "Hazardous Waste" or other designation for non-hazardous waste, with a generic description of the waste, and other relevant information), as applicable.

Containment (40 CFR 264.175, as modified by 22a-449(c)-104(a)(2))

(7) The Permittee shall ensure that HWSB-562 has the secondary containment capacity for the volume specified in Section II, Permitted Activities, of this permit. The Permittee shall maintain and operate the containment system in each storage bay and staging area (including any loading and unloading area) to ensure sufficient capacity to contain 10 % of the total permitted volume of all waste or 100 % of the volume of the largest container, whichever is greater. Any device or structure creating negative containment volume (e.g., containers, equipment, pallets, etc., within the secondary containment zone) shall be acknowledged and accounted for in the determination of the required secondary containment volume.

(8) The Permittee shall ensure that the containment system for HWSB-562 is maintained and operated as follows:

(a) The base of HWSB-562 shall be free of cracks or gaps and be sufficiently impervious so as to contain leaks, and any spills until the collected material is detected and removed;

(b) The base of HWSB-562 containment systems shall be pitched towards a trench to capture liquids resulting from leaks or spills.

(9) The Permittee shall ensure that the strength and thickness of the secondary containment is sufficient to prevent failure owing to pressure gradients, physical contact with the waste, climatic conditions, and the stress of daily operation.

(10) The Permittee shall maintain each container storage bay, staging area base (including any loading and unloading areas) as presented in Section II (A) and as described herein to provide adequate containment capacity. Each container storage bay, staging area base (including any loading and unloading area), where applicable shall be maintained to direct liquids to the trench in that area. The base of each container storage bay, staging area (including any loading and unloading area) shall not be obstructed in any manner which restricts or prevents the flow of liquids to the trench, where applicable.

Special requirements for ignitable or reactive waste (40 CFR 264.176)

(11) The Permittee shall ensure that containers holding ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.

Waste Incompatibility (40 CFR 264.177)

(12) The Permittee shall not place incompatible hazardous wastes, or hazardous wastes and other incompatible materials in the same container; and shall not place hazardous waste in an unwashed container that previously held an incompatible hazardous waste or other material unless the Permittee is in compliance with the WAP, incorporated herein as Attachment A.

(13) The Permittee shall ensure that any container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers is separated from the other materials or protected from them by means of a dike, berm, wall or other device.

Closure (40 CFR 264.178)

(14) The Permittee shall ensure that at the time of HWSB-562 closure, all hazardous waste and hazardous waste residues are removed from the containment system. In addition, any remaining containers, liners, bases and soil containing or contaminated with hazardous waste or hazardous waste residues are decontaminated or removed in accordance with the Closure Plan, incorporated herein as Attachment E.

Air Emissions Standards, Subpart CC (40 CFR 264.179)

(15) The Permittee shall manage all hazardous waste placed in containers in accordance with the applicable Air Emission requirements, 40 CFR 264, Subpart CC. At a minimum, the Permittee shall comply with 40 CFR 264.1086 (containers), as modified by 22a-449(c)-104(a)(2), 264.1088 (Inspection and Monitoring Requirements), as modified by 22a-449(c)-104(a)(2), 264.1089 (Record Keeping requirements), as modified by 22a-449(c)-104(a)(2) and 264.1090 (Reporting Requirements), and as modified by 22a-449(c)-104(a)(2).

(16) The Permittee shall ensure that all the containers in the container storage management area meet the U.S. Department of Transportation (DOT) regulations specified in 49 CFR Parts 173 and 178.

(17) RCRA empty containers, as defined in 40 CFR 261.7, are exempt from complying with Air Emission requirements.

(18) The Permittee shall ensure that all the containers holding hazardous waste are equipped with a cover and closure devices that form a continuous barrier over the container openings such that the cover and closure devices are secured in the closed position and that there are no visible holes, gaps or other open spaces into the interior of the container.

(19) The Permittee shall maintain any air emission control equipment documentation in the operating record of the facility for at least three (3) years.

(20) The Permittee shall maintain the records specified by 40 CFR 264.1089 (b) and (e), as modified by 22a-449(c)-104(a)(2), in the operating record for a period of at least three (3) years.

(C) SPECIFIC WASTE MANAGEMENT UNITS OPERATING CONDITIONS

(1) Truck Yard

(a) The Permittee shall post fixed markings or signs and maintain such markings or signs on each Storage Module or container in the Truck Yard. These markings or signs shall designate each type of waste (i.e., acid, alkaline, toxic, used oil, waste batteries, crushed used oil filters, hazardous waste, solid waste, etc.) being stored or managed therein. Each sign or marking shall be secure, legible and clearly visible from a distance of twenty-five (25) feet.

(b) Prior to the removal, addition, transfer, or bulking of containers of waste in the Truck Yard, the Permittee shall protect all storm drains in the Truck Yard in a manner to prevent a spill from entering such drains (e.g., by use of a mat or boom) and shall remove any excess precipitation from a storm event in the immediate area.

(c) The Permittee shall not transport, load, unload, transfer, treat, manage or handle any waste or other materials, within, over or on any area of the Facility that has bare soil, broken asphalt or unprotected surfaces.

(d) The Permittee shall maintain all traveled surfaces (over which vehicles containing hazardous waste is moved or stored) at the site in good repair so that such surfaces can withstand the mechanical stress of traffic to which they are subjected and prevent damage to containers and spillage of waste or other materials during the use of such surfaces. For purposes of this provision, asphalt shall not be considered an "unprotected surface."

(e) The Permittee shall cleanup and report any spills in this area in accordance with the requirements of this Permit.

(2) Truck Parking Transfer Area

(a) Prior to the transfer of containers of waste to or from the Truck Parking Transfer Area, the Permittee shall ensure that the storm drain in this waste management unit is closed or otherwise protected in a manner to prevent a spill from entering the drain during the transfer.

(b) The floor drain in the Truck Parking Transfer Area must be closed at all times when vehicles containing containers of waste are located in this Area. The floor drain may only be opened after any liquids in the secondary containment area have been determined not to be a hazardous waste.

(c) The Permittee shall ensure that any vehicle containing waste destined for the permitted facility is parked in the Truck Parking/Transfer Area or Truck Yard. The Permittee shall not allow vehicles containing waste to park overnight or park at times when the Permittee's business is closed, anywhere at the permitted facility, other than the designated Truck Parking/Transfer Area.

(d) The Permittee shall ensure that truck drivers obtain the necessary shipment paper work from Administration Office Personnel prior to any off-site shipment.

(e) The Permittee shall train truck drivers to report any incident, spills or leaks immediately to Administration Office Personnel prior to departure.

(f) The Permittee shall maintain all traveled surfaces (over which vehicles containing hazardous waste is moved or stored) at the site in good repair so that such surfaces can withstand the mechanical stress of traffic to which they are subjected and prevent damage to containers and spillage of waste or other materials during the use of such surfaces. For purposes of this provision, asphalt shall not be considered an "unprotected surface."

(g) The Permittee shall cleanup and report any spills in this area in accordance

with the requirements of this Permit.

(3) Staging Area located in HWSB-652

(a) Except for satellite bulk containers, the Permittee shall not allow containers of liquid waste to remain in the Staging Area for greater than twelve (12) hours unless the waste is located on a secondary containment pallet where it can remain for up to five (5) days. The Permittee shall maintain a written log which, at a minimum, shall include the time the last container left the Staging Area or time of inspection, whichever is later, so that it can be determined whether the twelve (12) hour limit has been exceeded. The Permittee shall maintain this log as part of the permitted facility Operating Record and shall make it available in written form upon request by the Commissioner.

(b) The Permittee shall paint lines or place tape on the floor of the Staging Area which delineates and identifies the boundaries of the satellite container bulking location and the miscellaneous storage locations authorized by this permit. The Permittee shall maintain this delineation at all times.

(c) The Permittee shall ensure that quantities of liquid waste present in any combination of palletized and unpalletized containers do not exceed the quantity allowed in the Staging Area pursuant to Section II (A) (1)(b) of this permit unless additional secondary containment has been provided.

(d) Space between any containers or pallets of containers in the Staging Area shall be maintained at a minimum separation distance of thirty (30) inches in order to allow for inspection of containers or mitigation of spills or leaks.

(e) Containerized waste shall be placed on pallets. The stacking of containers containing waste in the Staging Area other than containers of less than five (5) gallon capacity shall be limited to not greater than one (1) tier.
Note: For the purposes of this permit, a tier shall be defined as a single layer of containers which are not stacked one on top of another but which may be arranged on a pallet.

(f) The Permittee shall maintain a drum cart or a fork lift truck in the vicinity of the Staging Area to allow for quick transfer or movement of drums in the event of an emergency.

(g) The Permittee shall transfer those containers that meet the acceptance criteria to the appropriate Container Storage Bay(s); the Process Room; or the Truck Yard Storage Modules.

(4) Container Storage Bays located in HWSB-562. The Permittee shall comply with the following requirements regarding stacking of containers in the Container Storage Bays:

(a) All containers shall be maintained on pallets while in the Container Storage Bays.

(b) All labels must be legible to a person standing at floor level. Notwithstanding, no stack of containers shall exceed eight and one-half (8.5) feet in height;

(c) The Permittee shall ensure that all container stacking complies with all applicable NFPA Guidelines and Occupational Safety and Health (OSHA), General Industries Standards, whichever is more stringent;

(d) Container Storage Bay Nos. 112, 113, 118, 119, and 120 may only have containers stacked one (1) tier high. Container Storage Bays 114, 115, 116, and 117 may have containers stacked not greater than two (2) tiers high. Should Container Storage Bays 114, 115, or 116 be re-designated either as waste type "Acid" or "Alkaline" the waste containers may be stacked two (2) tiers high as long as all other conditions of Sections II and III of this permit are complied with;

(e) All stacked containers, with the exception of five (5) gallon containers, shall have a pallet in between each layer. Stacking of five (5) gallon capacity containers shall be limited to four (4) tiers with a pallet placed between each two (2) tiers of stacked five (5) gallon capacity containers;

(f) The Permittee shall ensure that any method used to stack containers prevents each container from falling over. Stacking shall be conducted in a manner that ensures stability; and

(g) The Permittee shall not stack containers or place stacked containers in the Service Aisle, except for five (5) gallon capacity containers that may be stacked up to two (2) tiers.

(5) Process Room located in HWSB-562

(a) The Permittee shall ensure that prior to any waste entering the process room the waste has been appropriately characterized in accordance with the WAP, and is accompanied by the appropriate paperwork.

(b) The Permittee shall maintain a minimum aisle space of thirty (30) inches between each process work area in order to allow for inspections and access to equipment.

(c) The Permittee shall place lines or marks on the floor to identify each process work area.

(d) The Permittee shall clearly and permanently mark or post a sign at each individual process area so as to identify the type of process and the type of waste to be processed in that area.

(e) The Permittee shall only allow trained personnel to operate the treatment equipment in the process room.

(f) Prior to operating any treatment equipment in the Process Room the Permittee shall ensure that personnel have the appropriate personal protection equipment.

(g) The Permittee shall comply with the following requirements for each treatment activity in the Process Room:

(1) Aerosol Can Puncturers

(i) The Permittee shall treat RCRA hazardous and non-RCRA hazardous aerosol cans in one of the two (2) self-contained aerosol can puncturers. Each aerosol can puncturer shall be operated in a manner that will prevent any vapors from escaping into the air.

(ii) The Permittee shall equip each aerosol can puncturer with a thirty (30) gallon capacity container or a 55-gallon capacity container to capture liquid wastes. Additionally two (2) containers may be located in the process room: one (1) satellite container shall be for processed aerosol cans and one (1) satellite container shall contain aerosol cans to be processed. The containers shall be closed when not in use.

(iii) The Permittee shall prevent any liquids from spilling from the aerosol can puncturers.

(iv) The Permittee shall clearly label each aerosol can puncturer identifying its use for RCRA or non-RCRA wastes.

(2) Oil Filter Crusher. The Permittee's oil filter crusher shall utilize at any one time not more than one (1) five (5) gallon container for storage of the oil from the crushed oil filters and one (1) container with a capacity not greater than fifty five (55) gallons to store the crushed oil filters.

(3) Mercuric Nitrate Reclamation Unit

(i) The Permittee's Mercuric Nitrate Reclamation Unit shall not treat or process more than five (5) gallons of the spent mercuric nitrate waste at any one time. Only one (1) spent mercuric nitrate waste container shall be in the process area at any one time.

(ii) The Permittee shall ensure that the Mercuric Nitrate Mercury Reclamation Unit has 100% secondary containment located under the wall mounted unit.

(iii) The Permittee's Mercuric Nitrate Mercury Reclamation Unit shall

utilize not more than one (1) fifty five (55) gallon container for the storage of treated mercuric nitrate effluent. The containers shall be closed when not in use.

(iv) The Permittee shall ensure that any spent filters from the Mercuric Nitrate Reclamation Unit treatment operations are managed as a hazardous waste unless a waste characterization demonstrates otherwise.

SECTION IV

GENERAL CONDITIONS
RCRA PART B PERMIT RENEWAL

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

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SECTION IV
GENERAL FACILITY CONDITONS

(A) IMMINENT HAZARD ACTIONS. Notwithstanding any provision of this Permit, enforcement actions may be brought pursuant to Section 7003 of Resource Conservation Recovery Act (RCRA), Section 22a-6 of the Connecticut General Statutes (CGS), or any other applicable law.

(B) REQUIRED TRANSFER NOTICE. In addition to complying with the requirements of Section I (E) (12), before transferring ownership or operation of the Facility during the operating life, the Permittee shall notify the new owner or operator in writing of the requirements of this permit, Title 40 CFR Parts 264 and 270, and of the Regulations of Connecticut State Agencies (RCSA) Sections 22a-449(c)-100 et. seq. The Permittee shall provide such new owner or operator with a copy of this Permit.

The Permittee's failure to notify the new Permittee of the requirements of this Permit in no way relieves the new Permittee of his obligations to comply with all applicable requirements.

(C) WASTE ANALYSIS

(1) The Permittee shall follow the procedures described in the Waste Analysis Plan, incorporated herein as Attachment A. Such a Waste Analysis Plan, at a minimum, shall comply with the requirements of 40 CFR 264.13, as modified by Section 22a-449(c)-104 of the RCSA.

(2) The Permittee shall maintain, at all times, a copy of the Waste analysis Plan at the Facility.

(3) The Permittee shall maintain waste data/profile sheets and copies of all records, documents or other information required to demonstrate compliance with the Waste Analysis Plan in the Facility′s operating record. This specifically includes, but it is not limited to:

(a) Waste characterization, verification and analysis of each hazardous waste stream stored and/or treated at the Facility as required by the Waste Analysis Plan; and

(b) Compatibility analysis as required by the Waste Analysis Plan.

(4) The Permittee shall, at all times, have available for inspection and review by the Department or EPA copies of all records, forms, procedural documents, manuals, etc., used to achieve compliance with the Waste Analysis Plan.

(5) Unless otherwise specified in the Waste Analysis Plan, all hazardous waste

characterization and analytical work performed in accordance with the Facility Waste Analysis Plan shall be as specified in the EPA document SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," latest edition.

(D) SECURITY

(1) The Permittee shall prevent the unknowing entry and minimize the possibility for the unauthorized entry of persons or livestock onto the active portion of the Facility.

(2) The Permittee shall ensure that all exterior doors to Building 562 are always locked, with the exception of the main entry door, which is unlocked during working hours.

(3) The Permittee shall ensure that the warning signs bearing the legend, "Danger - Unauthorized Personnel Keep Out" and "Danger - No Trespassing" shall remain posted in sufficient numbers to be seen from any approach to the Waste Management Areas. The sign shall be written in English and shall be legible from a distance of at least 25 feet.

(4) The Permittee shall maintain all security equipment systems in good repair at all times until final closure of the Facility.

(E) GENERAL INSPECTION REQUIREMENTS. In addition to any other inspection, requirements specified elsewhere in this permit, the Permittee shall:

(1) Perform inspections of the Facility in accordance with the Inspection Schedule incorporated herein as Attachment B. The Permittee shall maintain an Inspection Plan approved by the Commissioner at the Facility at all times.

(2) Inspect the Facility for malfunctions and deteriorations, operator errors, and discharges, which may be causing or may lead to releases of hazardous waste constituents to the environment, or a threat to human health.

(3) Remedy any deterioration or malfunction of equipment or structure, which the inspection reveals on a schedule that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action shall be taken immediately.

(4) Ensure that records of inspections are maintained at the Facility at all times, and contain such information and be on such forms as prescribed by the Inspection Schedule, incorporated herein as Attachment B. The records pertaining to inspections, remedial actions and repairs resulting from such inspections shall be kept for at least (3) three years from the date of inspection.

(F) PERSONNEL TRAINING

(1) The Permittee shall conduct personnel training as required by 40 CFR 264.16.

This training program shall comply with the requirements of 40 CFR 264.16(d)(3), and shall include training in all of the elements outlined in the Personnel Training Plan, incorporated herein as Attachment C. The Permittee shall train all facility personnel so as to ensure that the performance of their duties ensures that the Facility remains in compliance with this Permit. The Permittee shall maintain a copy of the Personnel Training Plan and the program for the annual review of such training at the Facility at all times.

(2) The Permittee shall ensure that the Personnel Training Plan includes, but is not limited to, the following if relevant to their position:

(a) Implementation of the facility Contingency Plan;
(b) The activities authorized and prohibited by this Permit;
(c) The waste prohibitions contained in Section II of this Permit;
(d) The communications or alarm systems at the Facility;
(e) Sampling methods and sample handling procedures required to comply with the terms of this Permit;
(f) The requirements of the Waste Analysis Plan;
(g) The hazards associated with all of the wastes that may be managed at the Facility and safe handling practices for all such wastes;
(h) The selection and use of proper personnel protection equipment and emergency equipment;
(i) Training in emergency response procedures, including but not limited to, routes of exposures associated with any release, relevant technical information regarding any waste or product that may be brought to the waste management areas of the Facility and the requirements specified in 40 CFR 264.16(a)(3);
(j) Requirements regarding the use of manifests, bills of lading, or other required shipping papers;
(k) Requirements regarding the management of hazardous wastes relevant to their position; and
(l) On the job training.

(3) The Permittee shall ensure that the Facility personnel successfully complete the training program required by this Permit within six (6) months after the effective date of their employment or assignment to the Waste Management Areas or to a new position in the Waste Management Areas, whichever is sooner. The Permittee shall ensure that untrained employees do not handle, manage or become involved in activities involving hazardous waste. Employees shall not work in unsupervised positions until they have completed the training required by this Permit.

(4) The Permittee shall ensure that all facility personnel receive and successfully complete an annual review of the Personnel Training Plan within three-hundred-sixty-five (365) days of the date that any Facility personnel received the initial or the previous year's annual review training.

(5) The Permittee shall maintain the following documents and records in the Facility

Operating Record:

(a) The job title for each position at the Facility related to hazardous waste management and the name of the employee filling each job;

(b) A written job description for each position listed under paragraph IV (F) (5)(a). This description shall be consistent with descriptions for other similar positions in the organization but must include the requisite skill, education or other qualifications, and duties of employees assigned to each position;

(c) A written description of the type and duration of both introductory and continuing training that will be given to each person filling a position listed under Section IV (F) (5)(a), above; and

(d) Records documenting that the training or job experience required by 40 CFR 264.16(a), (b), and (c) and as specified in the Personnel Training Plan, incorporated herein as Attachment C, has been given to, and completed by, Facility personnel or other qualified personnel.

(6) The Permittee shall keep training records on current personnel until final closure of the Facility; training records on former employees shall be kept for at least three (3) years from the date the employee last worked at the Facility. Personnel training records may accompany personnel transferred within the same organization.

(7) The Permittee shall ensure that the training program be directed by a person trained in hazardous waste management procedures or other relevant procedures, and that the program includes instructions which teaches Facility personnel hazardous waste management procedures relevant to the positions in which they are employed.

(G) GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE, AND/OR OTHER CO-STORED MATERIALS.

The following requirements are in addition to any other requirements specified in this permit regarding ignitable, reactive or incompatible waste and/or other co-stored materials.

(1) The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste or other co-stored materials. These wastes or other co-stored materials shall be separated and protected from sources of ignition including but not limited to: open flames, smoking, cutting, welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), radiant heat, and any other condition that could cause the waste to ignite. The Permittee shall ensure that all open flames, cutting, and welding within the proximity of the waste storage and management areas shall only be allowed with the advance approval of the designated safety personnel or under the

direct supervision of the Facility's Emergency Coordinator or Alternate Emergency Coordinator (designee). While ignitable or other such co-stored material is being stored, handled, or otherwise managed in the hazardous waste storage area(s), no smoking shall be allowed. For purposes of this subsection the term "ignitable waste" shall be defined as any substance or material exhibiting the characteristics of ignitability as prescribed in 40 CFR 261.21.

(2) The Permittee shall take precautions to prevent reactions which:

(a) Generate extreme heat or pressure, fire or explosions, or violent reactions;
(b) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
(c) Produce uncontrolled flammable fumes or gases in sufficient quantities to threaten human health or the environment;
(d) Damage the structural integrity of any Waste Management Area, container, or any emergency equipment; and
(e) Through other like means, threaten human health or the environment.

(3) The Permittee shall ensure that containers holding ignitable or reactive hazardous wastes or other co-stored materials in a Waste Management Area are located at least 15 meters (50 feet) from the facility property line. Note: this requirement is only applicable to the Waste Storage Areas and not staging or loading/unloading areas.

(4) The Permittee shall ensure no smoking or open flames occur wherever there is a hazard from ignitable or reactive hazardous wastes or other co-stored materials. The Permittee shall prominently display and maintain a "No Smoking" sign(s) in each such area. Each "No Smoking" sign shall be legible from a distance of 25 feet.

(H) PREPAREDNESS AND PREVENTION

(1) Design and Operation of the facility (40 CFR 264.31). The Permittee shall maintain and operate the Waste Management Areas so as to prevent fire, explosion, or any unplanned, sudden or non-sudden, release of waste or waste constituent(s) thereof to or from the Waste Management Areas to air, soil, surface water or ground water.

(2) Required Equipment (40 CFR 264.32). The Permittee shall ensure that the emergency equipment specified in the Facility Contingency Plan, incorporated herein as Attachment D, is available at all times. The Permittee shall locate all of the emergency equipment as shown or described in the Contingency Plan. The Permittee shall, at a minimum, have at the Facility:

(a) An internal communications or alarm system;
(b) A device, such as a telephone, capable of summoning emergency assistance from local emergency response teams;
(c) Portable fire extinguishers, fire control equipment, spill control and decontamination equipment; and
(d) Water at adequate volume and pressure to supply water hose streams, or

foam producing equipment.

(3) Testing and Maintenance of Equipment (40 CFR 264.33). The Permittee shall test and maintain all safety equipment. The Permittee shall ensure that all waste management areas communications or alarm systems, fire protection equipment, emergency equipment, spill control equipment, and decontamination equipment are immediately accessible and operate properly at all times. The Permittee shall inspect and test such equipment in accordance with all applicable laws, regulations, ordinances and Inspection Schedule Plan, incorporated herein as Attachment B. The Permittee shall maintain in the Operating Record for the Facility written records demonstrating that such inspections took place, record the results of the testing of the equipment noted in this paragraph and any action(s) taken in response to such testing.

(4) Access to Communications or Alarm System (40 CFR 264.34). The Permittee shall ensure that whenever waste is being moved, sampled, poured, emptied, treated, pumped or otherwise handled at the waste management areas all personnel involved have immediate access to an internal alarm or emergency communication device, either directly or through visual or verbal communication with other facility personnel. In the event that only one employee is engaged in activities identified in this paragraph, the Permittee shall ensure that the employee has immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance.

(5) Required Aisle Space (40 CFR 264.35). The Permittee shall maintain aisle space width in the waste management areas to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in case of an emergency.

(6) Arrangements with Local Authorities (40 CFR 264.37)

(a) Whenever any changes occur in the Facility layout or operation, or in the Contingency Plan itself, which materially affects implementation or execution of the Contingency Plan, the Permittee shall, within fifteen (15) calendar days of the approval of a modification to this Permit or within fifteen (15) calendar days of such change if no permit modification is needed, provide a copy either by an electronic record format or by certified mail, return receipt requested, to fire departments, hospitals and emergency response services for the Facility, including but not limited to those listed above, the revisions to the Contingency Plan or a revised Contingency Plan. At a minimum, the Permittee shall notify the following entities:

(i) SUBASENLON Fire Department and Assisting Fire Departments;
(ii) Lawrence and Memorial Hospital;
(iii) William W. Backus Hospital;
(iv) Emergency Response Services of Pre-Approved Contractors

through Basic Ordering Agreements (BOAs); and

(v) SUBASENLON Dispatch Center/Navy On-Scene Coordinator.

(b) The Permittee shall ensure that each entity under contract to provide emergency response services at the Facility has a permit, issued by the Commissioner pursuant to Section 22a-454 of the CGS, authorizing such entity to provide emergency response services.

(c) The Permittee shall invite the police department; fire department, hospital and governmental emergency response teams listed in paragraph IV (H)(6)(a) above to visit the facility and shall attempt to make arrangements to enable each such entity to respond to an emergency at the site. At a minimum, the Permittee shall provide each such entity with information regarding the layout, alarm systems and emergency equipment at the site, the wastes which are or may be at the Facility and the health hazards associated with all such treatment, wastes and products, places where facility personnel may be located, entrances to and exits from the Facility, evacuation routes, and the contacts for all persons or entities who might provide emergency response services at the Facility. The Permittee shall maintain in the Operating Record for the Facility records demonstrating compliance with the requirements specified in this paragraph, including any records it receives in response to actions under this paragraph.

(I) CONTINGENCY PLAN

(1) The Permittee shall ensure that the provisions of the Contingency Plan, incorporated herein as Attachment D, are carried out and shall follow the emergency procedures described below, whenever there is an emergency event such a fire, explosion, or any sudden or non-sudden release of waste or waste constituent(s) thereof or product or constituent thereof which threatens or may potentially threaten human health or the environment.

(2) The Permittee shall maintain on-site, a Contingency Plan which has been approved by the Commissioner, which describes the actions facility personnel shall take in response to an emergency event which threatens or may potentially threaten human health or the environment. At a minimum the plan shall:

(a) Specify arrangements agreed by SUBASENLON with fire departments, hospitals, Emergency Response Service Contractors and, as applicable, federal, state and local emergency response teams to coordinate emergency services pursuant to 40 CFR 264.37;

(b) List the names, addresses, and telephone numbers (as applicable) of all persons qualified to act as emergency coordinators, which list shall be kept up to date. Where more than one person is listed, one shall be identified as the primary emergency coordinator and others shall be listed in the order in which they shall assume responsibility as alternates;

(c) List, and be kept up to date, the emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment). In addition, the plan shall include the location and a physical description of each item on the list, and a brief outline of the capability of each piece of emergency equipment;

(d) An evacuation plan for facility personnel that describes the signal(s) to be used to initiate an evacuation, evacuation routes, and alternate evacuation routes (in cases where the primary routes could be blocked by releases of waste, fire or explosion);

(e) A protocol for determining who will make decisions and remain in charge when responding to an emergency at the site; and

(f) Maintain an up to date inventory of all wastes on-site. This inventory shall identify the wastes in each permitted waste management area.

(3) The Permittee shall maintain the most recent version of the Contingency Plan incorporated herein as Attachment D, as approved by the Commissioner, at the Facility. The Emergency Coordinator, and any other personnel responsible for the implementation of the Contingency Plan shall receive copies of the Contingency Plan and all updates to the Contingency Plan and shall be briefed on the implications of any such changes.

(4) Amendment of the Contingency Plan.

(a) The Permittee shall immediately amend the Contingency Plan, in accordance with the permit modification procedures specified in Section I (E) (6) whenever:

(i) The Contingency Plan fails in an emergency;
(ii) The Facility changes in its operation, maintenance, or changes the response measures which must be taken in an emergency;
(iii) A modification to the list of Emergency Coordinator and/or Alternate Emergency Coordinator(s) is necessary; or
(iv) A modification to the list of emergency equipment is necessary.

(b) The Contingency Plan changes specified in Section IV (I) (4) (a) of this Permit are mandatory; however, the Permittee may submit to the Department, in writing, a request to make any other changes to the Contingency Plan. These requested modifications should be submitted with an application, accompanied by the appropriate fee, for a permit modification.

(c) The Permittee shall provide notification, as required in Section IV (H) (6) of this permit, regarding any changes in the Contingency Plan.

(5) In accordance with 40 CFR 264.55, the Permittee shall ensure that at all times there shall be at least one employee either on the Facility premises or on call (i.e., available to respond to an emergency event by reaching the Facility within a short period of time), with the responsibility for coordinating all emergency response measures. This Emergency Coordinator shall be thoroughly familiar with all aspects of the facility's Contingency Plan, all operations and activities at the Facility, the location and characteristics of waste, the location of all records within the Facility, and the facility layout. In addition, the Emergency Coordinator shall have the authority to commit the resources needed to implement the Contingency Plan. The Permittee shall ensure that up to date waste characterization data, laboratory analysis sheets, Safety Data Sheets (SDS's), and/or bills of lading/ shipping papers, shall be available to the Emergency Coordinator or his designee on a 24 hour-a-day, 7 day-a-week basis.

(6) Emergency Procedures.

(a) Whenever there is an imminent or actual emergency event, the Emergency Coordinator (or his/her designee) shall immediately:

(i) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
(ii) Notify appropriate state or local agencies and/or private emergency response providers with designated response roles if their help is needed.

(b) Whenever there is an emergency event, the Emergency Coordinator shall immediately identify the character, location, source, amount and extent of any waste or any constituents thereof that have been or may be released. The Permittee may do this by observation, review of facility records and, if necessary, by chemical analysis.

(c) Concurrently, the Emergency Coordinator shall assess possible hazards to human health or the environment that may result from the emergency event. This assessment shall consider both direct and indirect effects of the emergency event (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

(d) If the Emergency Coordinator determines that the Facility has had an emergency event that threatens or may potentially threaten human health or the environment, the Permittee shall report his findings as follows:

(i) If the Emergency Coordinator's assessment indicates that evacuation of local areas may be advisable, the Permittee shall immediately notify local and state authorities. The Emergency Coordinator shall be available to assist local and state officials and

decide whether local areas should be evacuated;

(ii) The Permittee shall immediately notify the Commissioner using the 24-hour emergency response and spill prevention number (860) 424-3338, or a toll free number 1-866-337-7745 or such other number that may be specified by the Commissioner, and provide orally to the Commissioner the information in Section IV **(**I)(6)(d)(iii) of this permit; and

(iii) As required by federal law, the Permittee shall notify either the government official designated as the on-scene coordinator for that geographical area, (in the applicable regional contingency plan under 40 CFR Part 1510) or the National Response Center using their 24-hour toll free number 1-(800)-424-8802. The notification shall include:

(1) Name and telephone number of reporter;
(2) Name and address of facility;
(3) Time and type of incident (e.g., release, fire explosion);
(4) Name and quantity of waste(s) or constituents thereof involved, to the extent known;
(5) The extent of injuries, if any; and
(6) The possible hazards to human health or the environment.

(e) During an emergency, the Emergency Coordinator shall take all necessary measures to ensure that fires, explosions, and releases do not occur, re-occur, or spread. These measures shall include stopping operations, collecting and containing any released wastes, any constituent thereof and removing or isolating containers or vehicles.

(f) If operations are suspended in response to an emergency event, the Emergency Coordinator shall monitor for leaks, pressure build up, gas generation, or ruptures in valves, pipes, containers or other equipment, where and when appropriate.

(g) Immediately after an emergency event, the Emergency Coordinator shall provide assistance to the emergency responders for either storing or disposing of recovered waste, product or any constituent thereof, or any other material that results from a release, fire, or explosion at the Facility.

(h) The Emergency Coordinator shall ensure that, in the affected area(s) of the Facility:

(i) No waste that may be incompatible with any recovered waste, or any other material that results from a release is stored or disposed of until cleanup procedures are completed; and
(ii) All emergency equipment listed in the Contingency Plan, is cleaned and fit for its intended use before operations are resumed.

(i) The Permittee shall notify the Commissioner, as well as state and local authorities that the Facility is in compliance with paragraph IV (I)(6)(h) above, of this Section, before operations are resumed in the affected area(s) of the Facility.

(j) The Permittee shall note in the operating record the time, date and details of any incident that requires implementing the Contingency Plan. Within fifteen (15) calendar days after the incident, the Permittee shall submit a written report on the incident to the Commissioner. The report shall include:

(i) Name, addresses, and telephone number;
(ii) Name, addresses, and telephone number of the facility;
(iii) Date, time, and type of incident (e.g., fire, explosion);
(iv) Description of the emergency event and its cause;
(v) Name and quantity of waste or constituent thereof involved;
(vi) The extent of injuries, if any;
(vii) An assessment of actual or potential hazards to human health or the environment, where this is applicable;
(viii) Estimated quantity and disposition of recovered material that resulted from the incident and all response actions taken or to be taken;
(ix) All corrective measures taken or to be taken in response to the incident; and
(x) All corrective measures taken or to be taken to ensure that the incident does not happen again.

(7) The Permittee shall maintain an up to date inventory of all wastes on-site. This inventory shall identify the wastes in each waste management area.

(J) MANIFEST SYSTEM (40 CFR 264.71). Whenever a shipment of hazardous waste is initiated from the Facility, the Permittee shall comply the applicable Sections of 22a-449(c)-100 through 119 and 22a-449(c)-11 of the RCSA, the requirements of 40 CFR 262, and the applicable sections of 40 CFR 264 Subpart E, regarding hazardous waste manifests.

(K) OPERATING RECORD (40 CFR 264.73). The Permittee shall maintain, in writing or in an electronic record that can be easily accessed or reproduced, the following information and shall maintain such information in the Operating Record until Facility final closure:

(1) A record of the wastes and other materials received into the Waste Management Areas including dates, quantities, and dates the waste/materials were removed from the waste management areas, where applicable;

(2) A records and/or results of waste analyses performed as specified in the Waste Analysis Plan, and 40 CFR 264.13; as modified by Section 22a-449(c)-104(a)(2)

of the RCSA, 40 CFR 268.4(a) and 40 CFR 268.7, as modified by Section 22a-449(c)-108(c)(2) of the RCSA;

(3) Summary reports and details of all incidents that require implementing the Contingency Plan, as specified in paragraph IV (I) (6)(j) of this Permit;

(4) Records and results of inspections as required by this Permit and the Inspection Schedule Plan. The records and results of such inspections shall be kept for the preceding three (3) years from the date of such inspection;

(5) A certification by the Permittee that it has a program in place (i.e., in accordance with the biennial hazardous waste report) to reduce the volume and toxicity of hazardous waste to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage or disposal currently available to the Permittee, which minimizes any threat to human health and the environment;

(6) A copy of all notices or certifications, the information contained in the notice (except the manifest number) and the certification and demonstration, if applicable, required by 40 CFR 268.7; as modified by Section 22a-449(c)-108(a)(2) of the RCSA and/or 40 CFR 268.8 prior to shipping any waste to an off-site permitted facility; and

(7) Any other information required by this Permit or by any applicable law to be maintained in the Facility Operating Record (i.e., biennial report, personnel training).

(L) AVAILABILITY, RETENTION, AND DISPOSITION OF RECORDS

(1) The Permittee shall ensure that all records required under Sections 22a-449(c)-100 to 119 of the RCSA, and this Permit, including all plans, are furnished upon request, and made available at all reasonable times for inspection to any officer, employee, or representative of the Department or EPA.

(2) The retention period for all records required under Sections 22a-449(c)-100 to119 of the RCSA and this Permit shall automatically be extended during the course of any unresolved enforcement action regarding the facility until such enforcement action is fully resolved or for any reasonable period of time as may be requested by the Commissioner. Any exemption from this requirement shall require the written approval of the Commissioner.

(M) BIENNIAL REPORT. The Permittee shall prepare and submit a biennial report to the Commissioner by March 1st of each even numbered year regarding waste activities at the Facility for the previous calendar year on a form prescribed by the Commissioner or EPA. In addition, the Permittee shall provide any other information that the Commissioner specifies relating to the activities at the Permittee's Facility. The Permittee shall comply with all the requirements of 40 CFR 264.75, as modified by Section 22a-449(c)-104(a)(2) of the RCSA.

(N) CLOSURE

(1) Closure performance standard. The Permittee shall close the Facility in a manner that:

(a) Minimizes the need for further maintenance;

(b) Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, the escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the soils, groundwater or surface water or to the atmosphere; and

(c) Complies with the closure requirements of Section 22a-449(c)-104 of the RCSA, any applicable portions of 40 CFR Part 264, Subpart G (Applicable to Closure) and Subpart I (applicable to container closure), the Department document for RCRA Closure Plan Guidance for TSDF, as amended, and the Closure Plan incorporated herein as Attachment E.

(2) Closure plan. The Permittee's Closure Plan shall contain all the information specified in 40 CFR 264.112(b), except that whenever the word "hazardous waste" is used in 40 CFR 264.112(b), it shall mean "waste" as that term is defined in this Permit and where the term "hazardous waste management unit" is used in 40 CFR 264.112(b), it shall mean "waste management unit/area" as that term is defined in this Permit.

(a) Written Plan. The Permittee shall have a written Closure Plan. A copy of the Permittee's most current Plan shall be kept at the Facility until final closure is completed and certified in accordance with Section IV (N) (8), of this Permit. A copy of the most current Closure Plan shall be furnished to the Commissioner upon request and shall be provided on the day of inspection, to any officer, employee or representative of the Department or EPA.

(b) Content of the Plan. The Closure Plan shall identify steps necessary to perform partial and/or final closure of the Facility. The Closure Plan at a minimum shall include the following:

(1) A description of how each waste management area shall be closed in accordance with 40 CFR 264.111;

(2) An estimate of the maximum inventory of wastes onsite at the Facility and a detailed description of the methods to be used during partial closure and final closure, including methods for removing, transporting and disposing of all hazardous wastes;

(3) A detailed description of the steps needed to remove or

decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure, including procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and criteria for determining the extent of decontamination required to satisfy the closure performance standard;

(4) A detailed description of other activities necessary during the closure period to ensure that all partial closures and final closure satisfy the closure performance standards; and

(5) A schedule for closure of each hazardous waste management area and an approximate year for final closure of the Facility.

(c) Amendment of the Closure Plan.

(1) The Permittee shall submit an application, accompanied by the appropriate fee, to the Commissioner to request a permit modification to amend the Closure Plan at any time prior to the notification of partial or final closure of the Facility. A copy of the proposed amended plan shall be included with the application. If changes are made, the Permittee shall maintain a summary of changes identifying the differences from the Closure Plan that was issued with this Permit.

(2) The Permittee shall submit an application to the Commissioner for a permit modification to authorize a change in the Closure Plan for the Facility whenever:

(a) A change in operating plans or Facility design affecting the Closure Plan;
(b) There is a change in the expected year of closure;
(c) In conducting partial or final closure activities, unexpected events occur requiring a modification of the Closure Plan; or
(d) New or additional information becomes known which requires a modification of the Closure Plan.

(3) The Permittee shall submit an application for a permit modification to the Commissioner including a copy of the proposed amended Closure Plan for approval at least sixty (60) calendar days prior to the proposed change in the Facility design or operation, or no later than sixty (60) calendar days after an unexpected event has occurred which has affected the Closure Plan. This requirement to amend the closure plan is in addition to and shall not relieve the Permittee of its obligation to comply with the permit modification procedures specified in Section I (E)(6) of this Permit regarding any changes in an operating plan for or design of the Facility. If an unexpected event occurs during the partial or final closure period, the Permittee shall submit a proposed amendment to the

Commissioner no later than thirty (30) calendar days after the unexpected event. Any such proposed amendment shall constitute and be treated as a request to amend this Permit and shall require the submission of an application, accompanied by the appropriate fee, to modify the permit.

(4) The Commissioner may request modifications to the Closure Plan under the conditions described in Section IV (N) (2) (c) (2) of this Permit. If such a request is made before the Permittee's Closure Plan has been modified by the Commissioner pursuant to Section IV (N) (2(c)), of this Permit, the Permittee shall make the requested modifications within sixty (60) calendar days of the request by the Commissioner, or within thirty (30) calendar days if an unexpected event occurs during partial or final closure. If an unexpected event occurs during the partial or final closure period, the Permittee shall submit a proposed amendment to the Closure Plan to the Commissioner no later than thirty (30) days after the unexpected event. Any such proposed amendment shall constitute and be treated as a request to amend this permit and shall require the submission of an application, accompanied by the appropriate fee, to modify the permit.

(d) Notification of partial closure and final closure for the Regulated Waste Management Area(s)

(i) The Permittee shall notify the Commissioner in writing at least forty-five (45) calendar days prior to the date it expects to begin either partial or final closure of the Facility and submit the closure plan for the Facility to the Commissioner with such notice. The date when the Permittee "expects to begin closure" shall be no later than thirty (30) calendar days after the date on which any waste storage area receives the known final volume of hazardous wastes, or if there is a reasonable possibility that the waste storage area will receive additional hazardous wastes, no later than one year after the date on which the waste storage area received the most recent volume of hazardous wastes.

(ii) If the Facility's permit is terminated, or if the Facility is otherwise ordered, by judicial decree or final administrative order requiring the Permittee, to cease receiving wastes or to close, then the requirements of notification of partial closure and final closure does not apply. However, the Permittee shall close the Facility in accordance with the deadlines established in 40 CFR 264.113.

(3) Notice of Tentative Determination. The Commissioner will provide notice that conforms to the requirements specified in Section 22a-6h of the CGS, regarding the Permittee′s Closure Plan submitted pursuant to this permit. Comments on the Permittee's Closure Plan shall be accepted for up to thirty (30) calendar days from the date of publication of the newspaper notice. The Commissioner may use discretion to hold a public meeting or hearing regarding the Permittee′s proposed

Closure Plan.

At the end of the public comment period, the Commissioner may approve the Permittee′s Closure Plan with or without any conditions that the Commissioner deems necessary. If the Commissioner approves the Permittee's Closure Plan, the approved plan, with any conditions deemed necessary by the Commissioner, will become a condition of this permit. If the Commissioner does not approve the proposed Closure Plan, the Commissioner shall provide the Permittee with a detailed statement of reasons for such refusal and the Permittee must modify or submit a new proposed Closure Plan within thirty (30) calendar days of receiving such written statement. The Commissioner shall then approve or modify in writing the Closure Plan resubmitted by the Permittee. If the Commissioner modifies the plan, this modified plan will become the approved Closure Plan and become a condition of this Permit. A copy of the modified plan with a detailed statement of reasons for the modifications shall be mailed to the Permittee.

(4) Disposal or decontamination of equipment, structures and soils. Within ninety (90) calendar days of the approval of the Permittee's Closure Plan or ninety (90) calendar days, after receiving the final volume of waste at the Facility or a Waste Management Area(s), whichever is later, the Permittee shall properly decontaminate or remove from the Waste Management Areas or Facility, as applicable, all waste in accordance with the Closure Plan approved by the Commissioner and all applicable requirements of Sections 22a-449(c)-100 through 119 of the RCSA. The Commissioner may approve a longer period for closure if the Permittee demonstrates to the Commissioner's satisfaction that the activities required to comply with the approved Closure Plan will take longer than ninety (90) calendar days to complete and that the Permittee has taken and will continue to take all steps needed to prevent threats to human health and the environment and will comply with any additional conditions deemed necessary by the Commissioner arising from the partial or final closure. Any demonstration by the Permittee referred to in Section IV (N)(4) of this Permit shall be made at least thirty (30) calendar days before the expiration of the ninety (90) calendar day period in Section IV (N)(4).

(5) Prior to beginning closure activities of the Facility, the Permittee shall submit to the Commissioner for review and final approval a revised Closure Plan that complies with the Connecticut RCRA Closure Plan Guidance, as amended.

(6) Time allowed for closure**.** The Permittee shall complete partial and final closure activities, as applicable, in accordance with the Closure Plan approved by the Commissioner within one-hundred-eighty (180) calendar days after such approval or within one-hundred-eighty (180) calendar days after receiving the final volume of waste at the Facility or a Waste Management Area, as applicable. The Commissioner may approve a longer period for closure if the Permittee demonstrates to the Commissioner's satisfaction that the activities required to comply with the approved Closure Plan will by necessity take longer than one-hundred-eighty (180) calendar days to complete and that the Permittee has taken and will continue to take all steps needed to prevent threats to human health and

the environment and will comply with any additional conditions deemed necessary by the Commissioner arising from the partial or final closure.

Any demonstration by the Permittee referred to in Section IV (N) (6) above of this Permit shall be made at least thirty (30) calendar days before the expiration of the one-hundred-eighty (180) calendar day period in Section IV (N) (6) above.

(7) The Permittee shall manage all waste generated during partial or final closure in accordance with all applicable statutes and regulations.

(8) Certification of closure. Within sixty (60) calendar days of completion of partial closure or final closure of any Waste Management Area, the Permittee shall submit to the Commissioner by registered mail, a certification signed by both the Permittee and by an independent professional engineer, licensed to practice in the state of Connecticut ("licensed P.E.") stating that the Waste Management Area or the Facility, as applicable, has been closed in accordance with the specifications in the Closure plan approved by the Commissioner.

(O) RCRA CORRECTIVE ACTION. The Permittee is under a Federal Facilities Agreement between the DEEP, EPA and the Department of the Navy. Such agreement delineates the manner in which the three agencies will work together to carry out the requirements of CERCLA and the Defense Environmental Restoration Program. These programs require remediation of the Facility and will serve to satisfy the RCRA site-wide correction action requirements. The Federal Facilities Agreement was signed by the Commissioner on October 26, 1994, by EPA on November 5, 1994 and by the Department of the Navy on October 2, 1994.

(P) FINANCIAL REQUIREMENTS. Pursuant to RCSA 22A-449(c)-104 incorporating 40 CFR 264.140(c), Subpart H and 40 CFR 264.101(b), federal agencies **are exempt** from all financial requirements of 40 CFR 264, Subpart H. Therefore, the Permittee is not required to submit and/or maintain liability assurance or financial assurance mechanisms. It is anticipated that the United States Department of Defense will finance the costs of closure/post-closure and site-wide investigation and remediation (corrective action). This exemption relieves the Permittee from demonstrating their financial ability to cover the costs of closure and corrective action in the application but does not relieve the Permittee from funding the costs of properly closing the facility in accordance with state and federal closure and corrective action requirements.

(Q) AIR EMISSION REQUIREMENTS, SUBPART CC, (Hazardous Wastes Containers):

(a) The Permittee shall manage all hazardous waste placed in containers in accordance with the Air Emissions requirements specified in 40 CFR 264.1086 (containers), 40 CFR 264.1088 (Inspection and Monitoring Requirements); and 40 CFR 264.1089 (Record-Keeping Requirements), as modified by 22a-449(c)-104(a)(2) of the RCSA.

(b) The Permittee shall ensure that all the containers in the Waste Management Area(s) meet the U.S. Department of Transportation (DOT) regulations specified

in 49 CFR Parts 173 and 178.

(c) RCRA empty containers, as defined in 40 CFR 261.7, are exempt from complying with the Air Emissions requirements.

(d) The Permittee shall ensure that all the 55 gallon containers are equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container (e.g., a lid on a drum or a suitably secured tarp on a roll-off box) or may by an integral part of the container structural design (e.g., a "portable tank" or bulk cargo container equipped with a screw-type cap).

(R) UNIVERSAL WASTES. The Permittee shall comply with all applicable requirements specified in Section 22a-449(c)-113 of the RCSA.

(S) USED OIL. The Permittee shall comply with all applicable requirements specified in Section 22a-449(c)-119 of the RCSA.

(T) APPLICABLE LAWS. Even if not specified in this Permit, the Permittee shall comply with all applicable federal, state and local laws.

(V) LOCATION STANDARDS. The Permittee shall ensure that the Facility complies with the requirements of 40 CFR 264.18. If the Permittee determines that the Facility does not comply with these requirements, the Permittee shall notify the Commissioner. Based upon such notification of non-compliance, the Commissioner may take whatever action he deems appropriate.

SECTION V

COMPLIANCE SCHEDULE
RCRA PART B PERMIT RENEWAL

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

SECTION V
COMPLIANCE SCHEDULE

All documentation that is submitted pursuant to conditions of Section V of this Compliance Schedule shall be approved in writing by the Commissioner or the Commissioner's designee.

(1) **Hazardous Waste Permit Part A Form**. On or before ninety (60) calendar days after issuance of this Permit, the Permittee shall submit for review and written approval by the Commissioner a revised Hazardous Waste Permit Part A Form to reflect the appropriate waste codes permitted for the facility in accordance with Section II of this Permit. At a minimum, it shall include:

(a) Information regarding item 4, Other Environmental Permits currently permitted by the Facility.

(b) List all the hazardous waste codes to reflect the waste codes that have been permitted and approved for the facility.

(c) Include the signatures of the authorized representative with respective name and date.

(2) **Contingency Plan**. On or before ninety (90) calendar days after issuance of this Permit, the Permittee shall submit for review and approval by the Commissioner a revise page 3-1, Hazardous Waste Emergency Coordinators, listing the designated Emergency Coordinator and Alternate contact for the Permitted Hazardous Waste management areas. At a minimum, it shall comply with the requirements listed in 40 CFR 264.52(d).

FIGURE	TITLE
Figure 1	Site Plan
Figure II-2	Permitted Waste Management Areas (Layout of Building 562)

(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

LEGEND & NOTES

FACILITY BOUNDARY

PROPOSED BUILDING ADDITION (OFFICE/ADMININSTRATION AREA)

NOTE 1: DETAILED BUILDING 562 PLAN SHOWN ON FIGURE I-4A

NOTE 2: DETAILED FIRE PROTECTION PLAN SHOWN ON FIGURE I-6

B25 B24

B541

B540

B539

B538

B542

B537

7' CHAIN LINK FENCE WITH 3 STRANDS BARBED WIRE

TRUCK YARD

GATE (LOCKED)

DOOR (LOCKED)

RAMP ENTRANCE (LOCKED)

OVERHEAD DOORS (LOCKED)

EXTERIOR DOORS (LOCKED)

BUILDING 562

EXTERIOR DOORS (LOCKED)

EXTERIOR DOORS (LOCKED)

BUILDING 563

4' CHAIN LINK FENCE

BUILDING A-51

METAL STORAGE BUILDING

BUILDING 565

ROLLOFF

ROLLOFF

ROLLOFF

ROLLOFF

ASPHALT CONCRETE PAVEMENT

BUILDING 561

WAHOO AVENUE

GRASS

NORTH

0 20 40 80
SCALE IN FEET

CAUTION: IF SHEET IS LESS THAN 34"x22" USE GRAPHIC SCALE

NAVFAC

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
NAVAL STATION NEWPORT

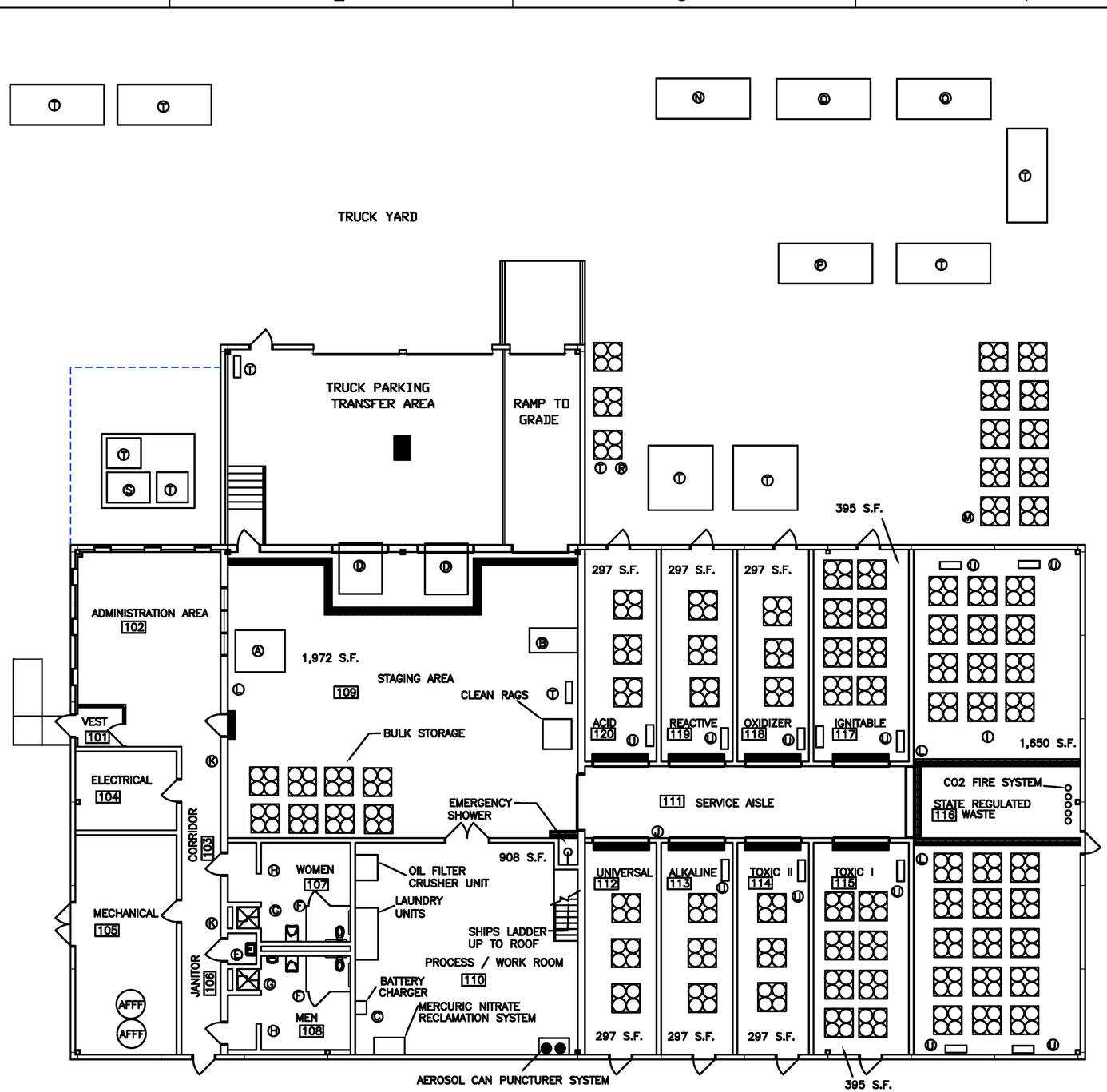
NAVAL FACILITIES ENGINEERING COMMAND MID-ATLANTIC
MIDDLETOWN/NEWPORT, RHODE ISLAND

NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT

FACILITY SITE PLAN

SCALE 1" = 200'

I-4



NORTH

EQUIPMENT LIST

- (A) DIGITAL FLOOR SCALE
- (B) FORKLIFT TRUCK EXPLOSION PROOF
- (C) BATTERY CHARGING STATION
- (D) TYPICAL 8' DOCK LEVELERS
- (E) SERVICE / MOP SINK
- (F) HANDICAP SINK
- (G) 36" x 36" SHOWER
- (H) METAL WARDROBE LOCKERS
- (I) TYPICAL 55 GALLON DRUMS ON PALLETS
- (J) TYPICAL TRENCH DRAIN FOR SPILL CONTAINMENT
- (K) 10 LB. ABC DRY CHEMICAL FIRE EXTINGUISHER IN WALL CABINETS IN MASONRY WALL
- (L) 20 LB. ABC DRY CHEMICAL FIRE EXTINGUISHER IN WALL CABINETS IN MASONRY WALL
- (M) NEW 55 GALLON CONTAINERS (OPEN & BUNG TOP) CONTAINER STORAGE AREA
- (N) UNKNOWN WASTE STORAGE UNIT (AWAITING ANALYSIS)
- (O) HAZARDOUS WASTE STORAGE UNIT
- (P) UNIVERSAL WASTE STORAGE UNIT (BATTERIES)
- (Q) USED OIL RECYCLING STORAGE UNIT
- (R) OVERPACK STORAGE AREA
- (S) EMPTY DRUM CONTAINMENT
- (T) GENERAL SUPPLIES
- (U) STORAGE CABINETS

115 ROOM NUMBER

DRAINAGE TRENCH

PROPOSED BUILDING ADDITION (OFFICE/ADMININSTRATION AREA)

0 8 16 24
SCALE IN FEET

CAUTION: IF SHEET IS LESS THAN 34"x22" USE GRAPHIC SCALE

NAVFAC

DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
NAVAL STATION NEWPORT

NAVAL FACILITIES ENGINEERING COMMAND MID-ATLANTIC
MIDDLEBURG/NEWPORT, RHODE ISLAND

NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT

BUILDING 562 LAYOUT

SCALE: 1/8" = 1'-0"

ATTACHMENT A

WASTE ANALYSIS PLAN

(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

Attachment K – Waste Analysis Plan

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
CT DEEP	Connecticut Department of Energy and Environmental Protection
EPA	United States Environmental Protection Agency
EPH	Extractable petroleum hydrocarbon
°F	Degree Fahrenheit
HMIS	Hazardous Materials Identification System
mg/kg	Milligram per kilogram
mL	Milliliter
NFPA	National Fire Protection Association
PCB	Polychlorinated biphenyl
ppm	Part per million
RCRA	Resource Conservation and Recovery Act
RGN	Reactivity Group Number
SDS	Safety data sheet
SM	Standard Method
TCLP	Toxicity Characteristic Leaching Procedure

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K.1 Waste Characterization

Before the permittee stores, treats, or manages waste generated on site, the permittee will obtain a detailed chemical and physical analysis of a representative sample of the waste. At a minimum, this analysis will contain all the information that must be known to treat, store, or dispose of the waste in accordance with 40 Code of Federal Regulations (CFR) Parts 261, 264, 266, 268, and 279 and the conditions of this permit.

The permittee will characterize all wastes generated on site that are stored, treated, or managed at the permittee's waste management units as follows:

- The first time a waste stream is generated, stored, treated, and/or managed at the permitted facility.

- When the permittee is notified, or has reason to believe, that the process or operation generating the waste has changed.

- When the permittee suspects that the characteristics of the waste have changed (e.g., when the waste does not conform to the description on the generator waste profile sheets Form DD-1348-1A, Form B1, or Form B2, as applicable).

- For annual re-characterization of wastes generated on site. These wastes include, but are not limited to, those generated from inventory control; ship/submarine operations, repair, and maintenance; submarine personnel training; shore facility operations, repair, and maintenance; Installation Restoration site remediation; spill control; and Naval Branch Health Clinic operations. All wastes will be stored or managed in the waste management units and analyzed for the parameters listed in Table K-1.

Table K-1
Selected Parameters and Rationales for Waste Categories

Waste Description	Parameters	Characterization Method	Rationale
Spent solvents	Flash point (for liquid waste) pH (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, reactivity, and toxicity Determine concentration of F-listed solvents

Waste Description	Parameters	Characterization Method	Rationale
Reactive wastes	Cyanide, sulfide, and water reactivity RCRA-regulated metals (TCLP) pH (for liquid waste)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, reactivity, and toxicity
Contaminated solid wastes	RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, reactivity, and toxicity Determine concentration of F-listed solvents
Paint and related wastes	Flash point (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability and toxicity Determine concentration of F-listed solvents
Photographic and photocopier plating wastes	Flash point (for liquid waste) pH (for liquid waste) RCRA-regulated metals (TCLP) Cyanide (total and amenable)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, reactivity, and toxicity
Corrosive liquid wastes	Flash point (for liquid waste) pH (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, and toxicity Determine concentration of F-listed solvents
Solid metals and metallic compounds	RCRA-regulated metals (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, reactivity, and toxicity
Contaminated noncorrosive aqueous and non-aqueous solutions and sludges	Flash point RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, reactivity, and toxicity Determine concentration of F-listed solvents
Mercury wastes	RCRA-regulated metal	Generator knowledge Sampling and analysis	Determine characteristic for toxicity Determine the presence of U-listed unused commercial chemical product
Used batteries and battery fluids	pH (for liquid waste) RCRA-regulated metals (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for corrosivity and toxicity
Unused/off-specification commercial chemical products	Flash point (for liquid waste) pH (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, reactivity, and toxicity Determine presence of P-listed or U-listed unused commercial chemical products
Gas cylinder wastes	RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for ignitability, corrosivity, and reactivity Determine presence of D-coded and U- and P-listed wastes
Coolant wastes	pH (for liquid waste) RCRA-regulated metals (TCLP)	Generator knowledge Sampling and analysis	Determine characteristic for corrosivity and toxicity

Waste Description	Parameters	Characterization Method	Rationale
Used oils	Total halogens	Generator knowledge Sampling and analysis	Rebuttable presumption for used oil. Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in 40 CFR 261, Subpart D. Persons may rebut this presumption by demonstrating that the used oil does not contain hazardous waste (for example, by demonstrating that the used oil does not contain significant concentrations of halogenated hazardous constituents listed in 40 CFR 261, Appendix VIII).
PCB wastes	Total PCBs	Generator knowledge Sampling and analysis	Determine if the waste contains 50 ppm or more PCB content and must therefore be managed as PCB waste (Connecticut waste code CR01).
Unknown wastes	pH (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP) Paint filter test Cyanide, sulfide, and water reactivity Flash point (for liquid waste)	Sampling and analysis	Testing is mandatory.
Mixed wastes	pH (for liquid waste) RCRA-regulated metals (TCLP) RCRA-regulated organics (TCLP) Paint filter test Cyanide, sulfide, and water reactivity Flash point (for liquid waste)	Generator knowledge Sampling and analysis	Wastes that are released from radioactive controls are managed as appropriate RCRA or State-regulated wastes only. Wastes that are not released from radioactive controls are managed concurrently as appropriate RCRA or State-regulated wastes and radioactive waste; all RCRA and CT DEEP waste requirements apply.

CT DEEP = Connecticut Department of Energy and Environmental Protection
PCB = polychlorinated biphenyl
ppm = part per million
RCRA = Resource Conservation and Recovery Act
TCLP = Toxicity Characteristic Leaching Procedure

All process wastes generated on site that are stored or managed in the waste management units will be characterized through laboratory analysis as specified in Sections K.1.3 and K.1.4 of this attachment. This detailed chemical and physical

analysis may be supplemented by manufacturer information or process information about the waste.

K.1.1 Manufacturer Information

First-hand data obtained from manufacturers pertaining to raw materials, products, or similar materials may be used when appropriate. This may include, but is not limited to, material specifications and safety data sheets (SDSs) that document specific parameters required to characterize the waste.

K.1.2 Process Information

First-hand knowledge of the process generating the waste may be used when appropriate. This includes documented data on the specific waste-generating process or information on the generation of waste by similar processes that document specific parameters required to characterize the waste.

K.1.3 Laboratory Analysis

If wastes cannot be properly or fully characterized through manufacturer information or process information as described in Sections K.1.1 and K.1.2, the permittee will obtain a representative sample of each waste and will conduct a detailed chemical and physical laboratory analysis of each such sample. Appropriate sampling and analytical procedures will be conducted by qualified trained personnel in accordance with the methods and requirements in United States Environmental Protection Agency (EPA) Publication SW-846, Test Methods For Evaluating Solid Waste: Physical/Chemical Methods Compendium (2014 or latest edition) or other EPA- or CT DEEP-approved methods.

Records of all required evaluations and analyses will be retained in the facility Operating Record as described in Attachment P.

K.1.4 Waste Certification Parameters

The permittee will evaluate and confirm waste characterization information through sample analysis for all constituents that form the basis for listing the waste as hazardous in accordance with 40 CFR 261. The permittee will conduct waste stream analyses in accordance with Table K-1. Waste analysis will ensure that the following information is obtained for each waste generated:

1. Physical description
2. Chemical name

3. Chemical composition
4. Hazardous constituents reasonably expected to be present
5. Degree of hazard assessment

In addition to the waste analysis, a compatibility determination will be conducted in accordance with Section K.3 and a degree of hazard assessment will be conducted through review of the SDSs associated with the wastes in accordance with Section K.4.

Prior to the receipt, storage, or treatment of any waste at the permitted facility, the permittee will:

1. Completely fill out Part 2B of Form B1, Turn-In Sheet for Profile Reviews and New/Unprofiled Waste, and ensure that the Part 2B information corresponds with the waste.
2. Review Form B2, Turn-In Sheet for Unusable or Expired Material Only, and/or the SDS to ensure that the information corresponds to the waste.
3. Review Form DD-1348-1A, DoD Issue Release/Receipt Document, to determine whether the permitted facility is currently authorized for receipt, storage, or treatment of the profiled waste.
4. Review and complete (if necessary) Form DD-1348-1A.

At the time of waste receipt at the permitted facility, the permittee will have the following completed paperwork:

1. For new/unprofiled (unknown) waste (first turn-in), the completed Form B1 and completed Form DD-1348-1A.
2. For profiled waste (recurring turn-in), the completed Form DD-1348-1A.
3. For unusable or expired material, the completed Form B2 and completed Form DD-1348-1A.

The permittee will maintain in the Operating Record Form B1 or Form B2 and Form DD-1348-1A, as applicable, for each waste received, stored, and/or treated at the permitted facility. These forms address all the waste certification parameters above as well as the selected parameters for each waste category as identified in Table K-1.

K.1.5 Frequency of Analysis

Identification of each waste is primarily based on the process generating the waste; therefore, SDSs for the chemical products that make up the waste streams are maintained at locations where wastes are managed. This information will be listed on Form B1. If Form B1 cannot be completely filled out, laboratory analyses will be performed on representative samples of the waste. Recurring profiles that are characterized based on testing will be scheduled for a retest annually.

K.1.6 Analytical Methods

Appropriate analytical methods will be used to conduct the analyses specified in Section K-1. Approved methods are those specified in EPA SW-846 (2014 or latest edition); methods listed in the codification of 40 CFR 260.11; methods prescribed by Standard Methods (SM) for the Examination of Water and Wastewater (American Water Works Association et al., 2017); or other EPA- or CT DEEP-approved methods. References to the specific analytical methods are included in Tables K-2 and K-3. Records of all characterization and analysis required by this Waste Analysis Plan must be retained in the facility Operating Record until closure of the permitted facility, as described in Attachment P.

Table K-2
Analytical Test Methods

Characteristic	Waste Code	Constituent of Concern	Analytical Method(s)
SW-846 Approved Analytical Methodologies			
Ignitability	D001	Flash point less than 140°F	1010A or 1020B
Corrosivity	D002	pH less than or equal to 2 or greater or equal to 12.5	9040C or 9045D
Reactivity	D003	Total cyanide greater than 590 mg/kg	9010C or 9012B
		Total sulfide greater than 500 mg/kg	9030B
Toxicity (Metals)	D004	Arsenic	6010D, 7010, or 7061A
	D005	Barium	6010D, 7000B, or 7010
	D006	Cadmium	6010D, 7000B, or 7010
	D007	Chromium	6010D, 7000B, or 7010
	D008	Lead	6010D, 7000B, or 7010
	D009	Mercury	7470A or 7471B
	D010	Selenium	6010D, 7010, or 7741A
	D011	Silver	6010D, 7000B, or 7010
Toxicity (Pesticides/Herbicides)	D012	Endrin	8081B or 8270E
	D016	2,4-Dichlorophenoxyacetic acid	8151A
Toxicity (Organics)	D018	Benzene	8021B or 8260D
	D019	Carbon tetrachloride	8021B or 8260D
	D021	Chlorobenzene	8021B or 8260D
	D022	Chloroform	8021B or 8260D
	D024	m-Cresol	8041A or 8270E
	D027	1,4-Dichlorobenzene	8021B, 8121, or 8270E
	D035	Methyl ethyl ketone	8015C or 8260D
	D040	Trichloroethylene	8021B or 8260D
	D043	Vinyl chloride	8021B or 8260D

Characteristic	Waste Code	Constituent of Concern	Analytical Method(s)
Spent Halogenated Solvents used in Degreasing	F001	Carbon tetrachloride	8021B or 8260D
		Methylene chloride	8021B or 8260D
		1,1,1-Trichloroethane	8021B or 8260D
		Tetrachloroethylene	8021B or 8260D
		Trichloroethylene	8021B or 8260D
		Chlorinated fluorocarbons	8021B or 8260D
Spent Halogenated Solvents	F002	Chlorobenzene	8021B or 8260D
		Methylene chloride	8021B or 8260D
		Ortho-dichlorobenzene	8021B, 8121, or 8270E
		Tetrachloroethylene	8021B or 8260D
		1,1,1-Trichloroethane	8021B or 8260D
		Trichloroethylene	8021B or 8260D
		Trichlorofluoromethane	8021B or 8260D
		1,1,2-Trichloroethane	8021B or 8260D
		1,1,2-Trichloro-1,2,2-trifluoroethane	8260D
Spent Nonhalogenated Solvents	F003	Acetone	8015C or 8260D
		n-Butyl alcohol	8260D
		Cyclohexanone	8315A
		Ethyl acetate	8015C or 8260D
		Ethyl benzene	8021B or 8260D
		Ethyl ether	8015C or 8260D
		Methanol	8015C or 8260D
		Methyl isobutyl ketone	8260D
		Xylene	8021B or 8260D
Spent Nonhalogenated Solvents	F005	Carbon disulfide	8260D
		Isobutanol	8260D
		Methyl ethyl ketone	8015C or 8260D
		Pyridine	8270E
		Toluene	8021B or 8260D
		Benzene	8021B or 8260D
		2-Nitropropane	8260D
CT DEEP Approved Analytical Methodologies			
Non-RCRA Process Waste	CR01	Waste PCBs	SW-846 8082A
Non-RCRA Process Waste	CR02	Waste oil	EPH Method
Non-RCRA Process Waste	CR04	Waste chemical liquid	None
Non-RCRA Process Waste	CR05	Waste chemical solid	None

°F = degree Fahrenheit
mg/kg = milligram per kilogram
EPH = extractable petroleum hydrocarbon

Table K-3
Appropriate Methods for Sample Preparation and Analysis as Found in Specific References

Parameter	Source/Method
TCLP	SW-846 1311
Total Solids (% solids)	SM 2540
Cyanide (amenable)	SM 4500-CN^-
Acidity	SM 2310
Alkalinity	SM 2320

K.1.7 Sampling Methods

The following methods will be used when conducting the sampling specified in this permit.

Table K-4
Sampling Methods

Waste Type	Sampling Device
Free-flowing liquids or slurries (drums)	Coliwasa or Sludge Judge
Sludge	Thief, Auger, Shovel, or Post Hole Digger
Moist powders or granules	Thief
Dry powders or granules	Thief

Samplers will be selected with lengths capable of obtaining representative samples of hazardous waste throughout the entire depth of the container. The sampling methods listed in Table K-4 will be performed as described in EPA SW-846 (2014 or latest edition).

Any samples that will not be immediately analyzed must be containerized and preserved in accordance with the methods specified in SW-846 or as required in the specific approved test method being used. The permittee will maintain a laboratory analysis quality assurance/quality control plan for the on-site certification analyses of hazardous wastes. The permittee will use only Connecticut Health Department- or EPA-certified laboratories for all samples not analyzed on site.

K.2 Waste Verification

K.2.1 Characterization of Process Waste Streams

Process waste streams that are derived from a known process or known materials but require analysis to determine additional waste codes or to verify changes in characteristics to completely fill out Forms DD-1348-1A and B1 will be stored in the storage modules with compatible wastes until such analytical results have been reviewed.

K.2.2 Characterization of Unknown Waste Streams

Unknown wastes, which are wastes that are found abandoned or have no legible label, will adhere to the following procedures:

1. The container will be inspected to ensure its integrity, weighed, and assigned a drum number.

2. The container will have a label placed on it clearly identifying such waste as an unknown hazardous waste.

3. The waste container will be placed in a storage module isolated from other containers or placed on an isolated containment pallet in the storage module.

4. The location of the unknown waste container will be identified in the facility log book and Forms DD-1348-1A and B1 will be completed as appropriate.

5. The unknown waste container will be sampled promptly by a qualified contractor or trained personnel wearing the appropriate personnel protective equipment.

6. Analysis will be ordered, results reviewed, and waste characterization profiles completed.

7. The container will be relabeled and relocated as appropriate based on the analytical results.

Waste received from submarines that does not have a properly completed Form DD-1348-1A will be managed as an unknown waste as described above.

K.2.3 Characterization of Spills

Spill residues from known sources of wastes in storage at the permittee's waste management units will be evaluated or analyzed for the appropriate parameters referenced in Table K-1. The results of these evaluations or analyses will be used to characterize the spill residues.

Spill residues from unknown sources will be evaluated and analyzed for all parameters listed in Section K.1.4 and Table K-1 to identify the waste, determine the proper waste management and compatibility group, and ensure that sufficient information is obtained for proper storage or management of the waste. If the material does not fall within the permitted waste specifications listed in Table K-1, the material will not be managed in the Hazardous Waste Management Facility (Building 562) and must be shipped off site to an approved facility within 90 days.

K.3 Compatibility Testing

K.3.1 Requirements

Hazardous wastes stored or managed in the waste management units will be fully categorized and verified in accordance with Sections K.1 and K.2 of this Attachment. Wastes that are annually characterized need not be recharacterized unless the permittee has reason to believe that the process or operation generating the waste has changed or that the characteristics of the waste have changed.

Using, at a minimum, the procedures specified in Section K.3.3, the permittee will:

1. Determine the compatibility of each waste with the container in which it may be stored or managed.

2. Determine the compatibility of each waste with each other waste with which it may be stored or managed in the same secondary containment unit.

3. Determine the compatibility of each waste with the physical structures it may come in contact with while being stored or managed in the appropriate waste management unit.

K.3.2 Definition

A waste is considered incompatible with another waste if, upon mixing or contact, a reaction may occur that:

1. Generates excessive heat or pressure, fire, explosion, or other violent reaction.

2. Produces toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment.

3. Produces flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion.

4. Damages the structural integrity of its container, containment structure, or any other structure or equipment required by this permit.

5. Threatens human health or the environment through any other means.

K.3.3 Procedures

The permittee will assess the incompatibility of wastes as follows:

1. For each waste stream generated that is to be stored or managed in the waste management units, the permittee will assign a Reactivity Group Number (RGN) to each chemical constituent present in the waste and conduct a compatibility assessment in accordance with EPA-600/2-80-076, A Method for Determining the Compatibility of Hazardous Wastes (1980).

   When it is known through material knowledge, manufacturer information, process knowledge, and/or evaluation or laboratory analysis that a waste does not exhibit the reactivity associated with a particular RGN for the given material, that RGN will not apply to the waste; however, documentation of this determination must be maintained in the facility Operating Record as described in Attachment P.

2. The permittee may use the segregation criteria identified in Table K-5 to summarize the RGN system, evaluate common waste streams, and categorize the wastes. In this system, acids, oxidizers, reactives, and unknown wastes are segregated from all wastes.

   Each profile sheet is evaluated to determine which RGNs apply and is assigned the appropriate broad categories listed in Table K-5. The segregation code is listed on Form B1, Turn-In Sheet for Profile Reviews and New/Unprofiled Waste, or Form B2, Turn-In Sheet for Unusable or Expired Material Only, at the time of initial waste characterization and is subsequently included on the list of Authorized Profiles.

Wastes that cannot be assigned to a broad category will be evaluated more completely using the RGN system as identified in Nos. 3 through 5 below.

Table K-5
Compatibility of Segregation Codes Chart

Waste Type	A	B	F	P	O	R	T	S	Unknown
Acid (A)	---	NO	NO	NO	NO	NO	NO	NO	NO
Alkaline (B)	NO	---	YES	NO	NO	NO	NO	YES	NO
Ignitable (F)	NO	YES	---	NO	NO	NO	YES	YES	NO
PCBs (P)	NO	NO	NO	---	NO	NO	YES	YES	NO
Oxidizers (O)	NO	NO	NO	NO	---	NO	NO	NO	NO
Reactives (R)	NO	NO	NO	NO	NO	---	NO	NO	NO
Toxics (T)	NO	NO	YES	YES	NO	NO	---	YES	NO
State-Regulated (S)	NO	YES	YES	YES	NO	NO	YES	---	NO
Unknown Wastes	NO	NO	NO	NO	NO	NO	NO	NO	---
NO = Cannot be stored together YES = May be stored together									

3. Using knowledge of the presence of chemical constituents within a waste and their RGN(s), and considering the concentrations of the chemical constituents, their physical states, the media in which they exist, the presence of other constituents, and other relevant factors, including those listed in Sections K.3.1 and K.3.2, the permittee will compare all likely RGN(s) for a waste stream with the RGN(s) allowed in each waste management unit. The permittee will then select a compatible waste management unit from among the permitted waste management units.

4. The permittee will consider any two wastes with RGNs indicating an incompatible reaction as incompatible unless documented compatibility tests demonstrate that the wastes in question are compatible.

5. For wastes identified as having an incompatible reaction, laboratory tests may be performed in accordance with the following example to further assess potential incompatible reactions of the wastes.

   Example: Under a fume hood, a small quantity (approximately 5 milliliters [mL]) of each waste should first be mixed to safely determine whether a highly vigorous

or otherwise potentially hazardous reaction occurs. If the observed reaction is not highly vigorous, a larger quantity (at least 500 mL) of each waste should be mixed and the reaction observed. If compatibility tests do not result in an incompatible reaction as defined in Section K.3.2 above, and having demonstrated compliance with 40 CFR 264.13 and 264.17, the permittee may, at the permittee's discretion, consider the substances compatible. If an incompatible reaction is observed, as defined in Section K.3.2 above, the substances will be considered incompatible.

6. Records of laboratory results and observations used to confirm any findings of compatibility or incompatibility for any wastes will be retained in the Operating Record for the permitted facility.

K.4 Degree of Hazard Determination

Prior to placing wastes into the waste management units, the permittee will determine the degree of hazard for each waste to be managed in the permitted facility using one of the following methods:

1. The permittee will review the SDS(s) associated with such wastes.

2. The permittee will determine the applicable degree of hazard and/or hazard class rating for each waste as defined in National Fire Protection Association (NFPA) 704 (2016 or latest edition), NFPA HAZ (2010 or latest edition), NFPA 400 (2018 or latest edition), NFPA 55 (2015 or latest edition), or by means of an alternate method for assessing hazards approved by CT DEEP.

   For mixtures containing two or more chemicals, the permittee will conduct one of the following:

   a) The degree of hazard for each chemical constituent will be obtained. The mixture will then be assigned the degrees of hazard that represent the most severe degrees of hazard associated with the mixture’s chemical constituents. When a chemical constituent does not have a degree of hazard rating, the permittee must assign one using either the NFPA 704 quantitative or qualitative determination or a CT DEEP-approved method. The selection and assignment of the degrees of hazard will clearly document the permittee's evaluation or analysis. The NFPA 704 criteria for qualitative information will be deemed appropriate when quantitative information is unavailable or inadequate.

b) Provided the permittee can determine and document the principal hazards of the mixture, the degrees of hazard for the entire mixture may be assigned in accordance with either the NFPA 704 quantitative or qualitative method, where qualitative information will be deemed appropriate when quantitative information is unavailable or inadequate, or the Hazardous Materials Identification System (HMIS).

All information used to make the degree of hazard determination must be clearly documented and maintained in the Operating Record of the permitted facility, as described in Attachment P.

K.5 Annual Recharacterization

The permittee will recharacterize each waste profile generated by the permittee that is received at its waste management units within 365 days after the waste has been initially characterized. Such recharacterization will be performed in accordance with Section K.1 of this Waste Analysis Plan in the same manner in which each hazardous waste was initially characterized.

K.6 References

American Water Works Association, American Public Works Association, and Water Environment Federation, 2017. Standard Methods for the Examination of Water and Wastewater. 23rd Edition. June.

EPA (United States Environmental Protection Agency), 1980. A Method for Determining the Compatibility of Hazardous Wastes. EPA-600/2-80-076. April.

EPA, 2014. Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium. SW-846. July.

NFPA (National Fire Protection Association), 2010. Fire Protection Guide to Hazardous Materials. NFPA HAZ. 10th Edition. January.

NFPA, 2015. Compressed Gases and Cryogenic Fluids Code. NFPA 55. 16th Edition. December 8.

NFPA, 2016. Standard System for the Identification of the Hazards of Materials for Emergency Response. NFPA 704. June 2.

NFPA, 2018. Hazardous Materials Code. NFPA 400. September 3.

Figure K-1
DoD Issue Release/Receipt Document
(Form DD-1348-1A)

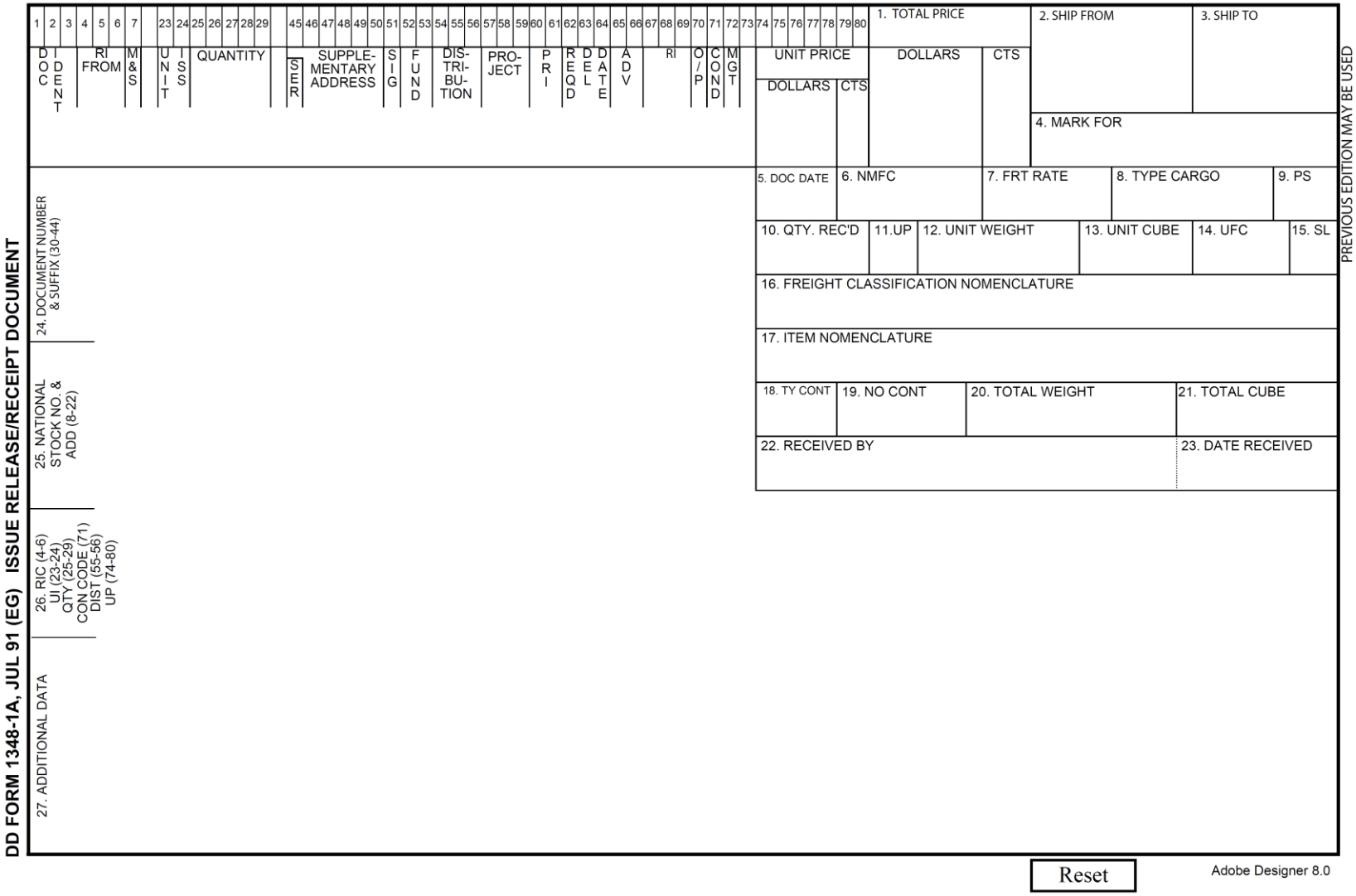

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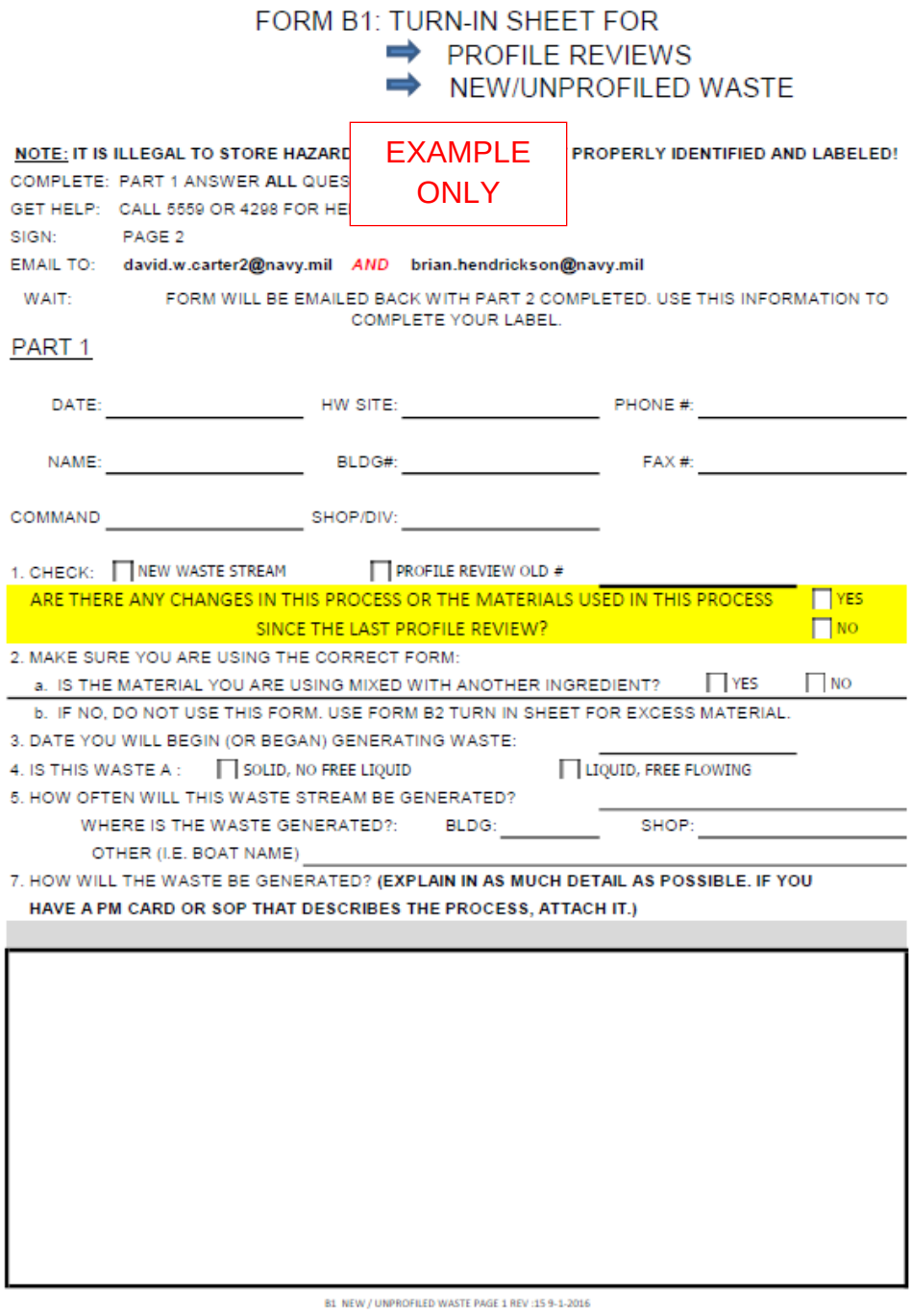
Figure K-2
Turn-In Sheet for Profile Reviews and New/Unprofiled Waste (Form B1)



FORM B1: TURN-IN SHEET FOR
➡ PROFILE REVIEWS
➡ NEW/UNPROFILED WASTE

EXAMPLE ONLY

NOTE: IT IS ILLEGAL TO STORE HAZARD … PROPERLY IDENTIFIED AND LABELED!
COMPLETE: PART 1 ANSWER ALL QUES
GET HELP: CALL 5559 OR 4298 FOR HE
SIGN: PAGE 2
EMAIL TO: david.w.carter2@navy.mil *AND* brian.hendrickson@navy.mil
WAIT: FORM WILL BE EMAILED BACK WITH PART 2 COMPLETED. USE THIS INFORMATION TO COMPLETE YOUR LABEL.

PART 1

DATE: _____ HW SITE: _____ PHONE #: _____

NAME: _____ BLDG#: _____ FAX #: _____

COMMAND _____ SHOP/DIV: _____

1. CHECK: ☐ NEW WASTE STREAM ☐ PROFILE REVIEW OLD # _____
ARE THERE ANY CHANGES IN THIS PROCESS OR THE MATERIALS USED IN THIS PROCESS SINCE THE LAST PROFILE REVIEW? ☐ YES ☐ NO
2. MAKE SURE YOU ARE USING THE CORRECT FORM:
a. IS THE MATERIAL YOU ARE USING MIXED WITH ANOTHER INGREDIENT? ☐ YES ☐ NO
b. IF NO, DO NOT USE THIS FORM. USE FORM B2 TURN IN SHEET FOR EXCESS MATERIAL.
3. DATE YOU WILL BEGIN (OR BEGAN) GENERATING WASTE: _____
4. IS THIS WASTE A : ☐ SOLID, NO FREE LIQUID ☐ LIQUID, FREE FLOWING
5. HOW OFTEN WILL THIS WASTE STREAM BE GENERATED? _____
WHERE IS THE WASTE GENERATED?: BLDG: _____ SHOP: _____
OTHER (I.E. BOAT NAME) _____
7. HOW WILL THE WASTE BE GENERATED? **(EXPLAIN IN AS MUCH DETAIL AS POSSIBLE. IF YOU HAVE A PM CARD OR SOP THAT DESCRIBES THE PROCESS, ATTACH IT.)**

B1 NEW / UNPROFILED WASTE PAGE 1 REV :15 9-1-2016

Figure K-2 (continued)
Turn-In Sheet for Profile Reviews and New/Unprofiled Waste
(Form B1)

8. IDENTIFY ALL OF THE MATERIALS USED:
   a: ATTACH YOUR CURRENT **CHRIMP AUL** WITH ALL MATERIALS USED CIRCLED, OR
   b: LIST MATERIALS ON **TABLE** BELOW BY THE HMIS MSDS SERIAL NUMBER, OR
   c: LIST MATERIAL AND **ATTACH** A MANUFACTURERS MSDS SHEET.

MAKE SURE THAT THE MSDS REFERENCED OR INCLUDED EXACTLY MATCHES THE MATERIAL USED
USE ADDITIONAL SHEETS IF NECESSARY.

MSDS SERIAL#	STOCK #	DESCRIPTION	MANUFACTURER
		EXAMPLE ONLY	

9. LIST ALL INCIDENTAL ITEMS SUCH AS- RAGS, BRUSHES, ABSORBENTS, KIMWIPES ETC.:

10. IN ACCORDANCE WITH THE CODE OF FEDERAL REGULATIONS **40 CFR PART 262**,
"STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE"
_____ HEREBY CERTIFY THAT ALL THE INFORMATION
(PRINT OR TYPE NAME)

SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THIS WASTE / MATERIAL. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

HAZARDOUS WASTE COORINATOR
(SIGNATURE REQUIRED)
TYPING NAME HERE CONSTITUTES A SIGNATURE

PART 2 **(TO BE COMPLETED BY SUBASE ENVIRONMENTAL)**

☐ A YOUR WASTE REQUIRES TESTING. THE FOLLOWING PROFILE INFORMATION IS PRELIMINARY AND MAY CHANGE UPON REVIEW OF THE TEST RESULTS.

LABEL: ☐ BLUE STATE LABEL (NON-REG) PROFILE #: _____
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE: _____

WASTE DESCRIPTION: _____

WASTE CODES _____

☐ B YOUR WASTE PROFILE IS COMPLETE. RETAIN THIS FORM FOR YOUR RECORDS.

LABEL: ☐ BLUE STATE LABEL (NON-REG) PROFILE #: _____
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE:--------

WASTE DESCRIPTION: _____

WASTE CODES _____

PROFILE COMPLETED BY: _____
PRINT NAME SIGNATURE DATE

B1 NEW / UNPROFILED WASTE /// REV :15 /// 9-1-2016

Figure K-2 (continued)
Turn-In Sheet for Profile Reviews and New/Unprofiled Waste
(Form B1)

MSDS SERIAL#	STOCK #	DESCRIPTION	MANUFACTURER

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Figure K-3
Turn-In Sheet for Unusable or Expired Material Only
(Form B2)

FORM B2: TURN-IN SHEET FOR: ➡ UNUSABLE OR EXPIRED MATERIAL ONLY

COMPLETE: COLUMNS 1-5 ON TABLE BELOW.
LIST: EACH ITEM BY MSDS SERIAL NUMBER AS LISTED ON CHRIMP BAR CODE OR
NO BAR CODE?: LIST MATERIAL BY HMIS MSDS SERIAL NUMBER OR
NOT IN HMIS?: ATTACH MANUFACTURER'S MSDS.
USABLE?: RETURN MATERIAL TO CHRIMP. IF REFUSED BY CHRIMP,CALL SUBASE ENVIRONMENTAL AT X (4673) FOR PICKUP. GIVE COMPLETED FORM TO DRIVER WITH COMPLETED 1348 AND MATERIAL(S).

IF **REFUSED** BY CHRIMP. NAME OF CHRIMP REP REFUSING. _____
DATE OF REFUSAL. _____

NOT USABLE?: EMAIL FORM TO SUBASE ENVIRONMENTAL AT david.w.carter2@navy.mil ***AND*** brian.hendrickson@navy.mil

MAKE SURE THAT THE MSDS EXACTLY MATCHES THE MATERIAL LISTED.

NAME:		HW SITE:			
COMMAND:		PH#:		DATE:	
BLDG/SHOP#:		FAX#:		SERIAL #	

GENERATOR COMPLETES COLUMNS 1-6:					ENVIRONMENTAL USE ONLY		
1. MSDS SERIAL #	2. STOCK #	3. DISCRIPTION	4.SOL, LIQ, AERO	5. MANUFACTURER	6.WASTE LABEL	7. WASTE CODES	8. SEG. CODE

EXAMPLE ONLY

FORM B2 REV 15 9-1-2016

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ATTACHMENT B

INSPECTION PLAN AND SCHEDULE LOG
(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

Attachment L – Inspection Schedule and Log

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Appendix L-6 Satellite Site Weekly Hazardous Waste Inspection Log

Acronyms and Abbreviations

CFR	Code of Federal Regulations
DOT	Department of Transportation
HWCP	Hazardous Waste Contingency Plan
HWMF	Hazardous Waste Management Facility
NA	Not applicable
NAVFAC	Naval Facilities Engineering Command
POP	Performance-oriented packaging
SUBASENLON	Naval Submarine Base New London

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L.1 Introduction

In accordance with 40 Code of Federal Regulations (CFR) 264.15 and State of Connecticut statutes, Naval Submarine Base New London (SUBASENLON) will fulfill the following general inspection requirements:

1. Inspect the facility for malfunctions and deterioration, operator errors, and discharges that may cause release of hazardous waste or pose a threat to human health.

2. Conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.

3. Develop and follow a written inspection schedule that will be kept at the facility. The inspection form will identify the types of problems to be looked for.

4. Inspect monitoring equipment, storage tanks, containers, treatment units, loading and unloading areas, safety and emergency equipment, security devices, and operating and structural equipment.

5. Remedy any deterioration or malfunction that the inspection reveals and take remedial action where an incident is revealed.

6. Record all inspections, including date and time of inspection, name of inspector, notation of observations made, and the date and nature of any repairs made and keep these records for a 5-year period.

Table L-1
Inspection Schedule for the Hazardous Waste Management Facility

Item for Inspection	Types of Problems	Frequency of Inspection	
		Facility Personnel	SUBASENLON or Contractor Personnel
Records			
Daily Inspection Log	Inspections not performed on a daily basis	Weekly	NA
Personnel Training Records	Training records incomplete or not kept up to date	Weekly	NA
Waste/Inventory Logs	Waste not logged in/out in a timely manner or inaccurate information	Daily	NA
Emergency Equipment			
Emergency eyewash and shower – permanent	Not functioning properly or damaged	Weekly	NA
Emergency exit	Obstructed	Daily	NA
Fire extinguishers (ABC dry chemical)	Damaged or missing	Weekly	NA
	Not fully charged	NA	Annually
	No hydrostatic pressure	NA	Replaced at least every 12 years
Fire pull boxes	Damaged, inoperable	NA	Annually
Sprinkler system	Leaking, low pressure	NA	Annually
Carbon dioxide system	Leaking, low pressure	NA	Annually
Foam system	Leaking, low pressure	NA	Annually
Trench alarm	No power, will not activate alarm	NA	Annually
Protective equipment (gloves, glasses, respirators, etc.)	Damaged or missing	Weekly	NA
Landline telephones	Damaged or missing	Weekly	NA
Cell phones	Low charge	Weekly	NA
Spill cleanup equipment	Damaged or missing contents	Weekly	NA
Ventilation system	Not functioning properly or filters need changing	NA	Quarterly

Item for Inspection	Types of Problems	Frequency of Inspection	
		Facility Personnel	SUBASENLON or Contractor Personnel
Security			
Fence, entrance gates, and doors	Unlocked, damaged, or not functioning properly	Daily	NA
Signs	Damaged or missing	Weekly	NA
Containers			
Tops/bungs	Open when not in use	Daily	NA
Waste stored	Incompatibles not properly segregated	Daily	NA
Labels	Missing; missing or illegible accumulation date; old markings present; not labeled "Hazardous Waste"	Daily	NA
Aisle space	Inadequate to reach all containers; containers in aisle	Daily	NA
Bulking process	More than eight pallets in staging area; unauthorized waste streams bulked	Daily	NA
Drum stacking	Double-stacked drums in areas other than Toxic, Ignitable, and State-Regulated storage bays	Daily	NA
Secondary Containment			
Floor trench	Debris or spill material	Daily	NA
Site Capacity			
Storage bay capacity	Waste stored in bay is over 100% capacity	Daily	NA
Outside Areas			
Storm drain	Filled with leaves, liquid, or debris	Daily	NA
Module signs	Signs describing module contents not clearly posted	Daily	NA
Module containment	Structural defects, spills, or debris	Daily	NA
Module containers	Open or improperly labeled	Daily	NA
Roll-off containers	Leakage or spill residues	Daily	NA
Roll-off covers	Open or torn	Daily	NA

Item for Inspection	Types of Problems	Frequency of Inspection	
		Facility Personnel	SUBASENLON or Contractor Personnel
Housekeeping			
Storage bays, service aisles, process room, and staging area	Spills	Daily	NA
Process room treatment systems	Unsecured when not in use	Daily	NA
Truck parking floor drain	Open when not in use	Daily	NA

NA – Not applicable

L.2 Inspection Schedule for the Hazardous Waste Management Facility

This section delineates the equipment and structures at the Hazardous Waste Management Facility (HWMF) that require routine inspections. A summary of the areas of inspection and inspection frequency are provided in Table L-1. Provided in Sections L.2.1 through L.2.8 are written descriptions of the inspections that will be performed at the HWMF. As discussed under these subsections and indicated in Table L-1, inspections will be performed by HWMF personnel, and these inspections will be used to satisfy the regulatory requirements. The results of each inspection will be entered onto inspection forms (see Section L.2.8).

L.2.1 Containers

All containers stored within the HWMF will be inspected for condition (e.g., dents, signs of corrosion, deterioration, leaks, etc.), whether open or closed, whether properly labeled, and whether stored with incompatible wastes.

Aisle spacing within the storage bays will also be inspected by facility personnel to verify that there is adequate spacing to allow for unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the event of an emergency. Facility personnel will also inspect these areas for any containers stored outside the containment area.

L.2.2 Secondary Containment

Secondary containment is provided for each storage bay by means of concrete floor surfaces, building walls, and floor drainage trenches, which will be visually inspected for signs of structural defects (e.g., cracks, damage, erosion, integrity of coating, etc.).

L.2.3 Loading/Unloading Area

The loading and unloading area at the HWMF will be inspected by facility personnel for leaked or spilled residue and debris. The outside trench located at the base of the loading and unloading area will also be inspected daily by facility personnel for spilled residue and debris.

L.2.4 Site Capacity

Facility personnel will verify on a daily basis that the storage capacities listed below are not exceeded.

Table L-2
Storage Bay Maximum Capacities

Storage Bay	Maximum Solid and Liquid Capacity (gallons)	Maximum Liquid Capacity (gallons)
Alkaline	1,145	935
Toxic I	4,445	1,810
Toxic II	2,200	935
Ignitable	1,865	1,810
Oxidizer	1,145	935
Reactive	1,130	935
Acid	1,145	935
Universal Waste	1,100	935
State-Regulated	18,660	10,090

L.2.5 Emergency Equipment Inspection

This section addresses the frequencies and types of inspections to be conducted for the communication and alarm systems, fire extinguishing equipment, safety equipment, spill control equipment, and other emergency equipment located within the HWMF. The locations of all emergency equipment are provided on Figure I-6 and in the Hazardous Waste Contingency Plan (HWCP), which is provided as Appendix M-1.

L.2.5.1 Fire Extinguishing Equipment

All portable fire extinguishers in waste management areas will be inspected weekly by facility personnel for damage and proper location. Any fire extinguishers requiring service will be taken to the SUBASENLON Fire Department for exchange. Each fire extinguisher will also be weighed annually by the SUBASENLON Fire Department to determine whether it is fully charged. The results of these tests will be maintained by the SUBASENLON Fire Department. Fire extinguishers are replaced by the SUBASENLON Fire Department when they expire, no less frequently than every 12 years.

L.2.5.2 Spill Clean-Up Equipment

All spill clean-up equipment (absorbent pads, etc.) will be inventoried and checked for operational status.

L.2.5.3 Communication Systems

The communication systems employed within the HWMF include voice contact, landline telephones, and cell phones. Landline telephones and cell phones are used daily by facility personnel; therefore, any operational problems associated with these communication devices will be detected the same day. Landline telephones will be inspected weekly to ensure that they are not damaged or missing, and cell phones will be inspected weekly to ensure that they are adequately charged.

L.2.5.4 Fire Protection Equipment

The pull-boxes located within the HWMF will activate an internal audible fire alarm only. This alarm system will be tested at least annually by the SUBASENLON Fire Department. The sprinkler system, carbon dioxide system, and foam system installed in the HWMF will contact the SUBASENLON Fire Department when activated. All three systems will be tested annually by the SUBASENLON Fire Department or an outside contractor for pressure, leaks, and signal to the SUBASENLON Fire Department. The results of these tests will be maintained by the SUBASENLON Fire Department.

L.2.5.5 Signs

The signs "DANGER UNAUTHORIZED PERSONNEL KEEP OUT" and "NO SMOKING" will be inspected weekly by facility personnel for damage and proper location.

L.2.5.6 Ventilation System

Inspection of the ventilation system within the HWMF will consist of daily observations by facility personnel inside the building. The ventilation system will be serviced quarterly by an outside contractor.

L.2.5.7 Trench Alarms

The collection trench located in front of each storage bay is equipped with a high-level trench alarm. These alarm systems, when activated, sound an internal alarm and send an alert to the SUBASENLON Emergency Dispatch. This alarm system will be tested at least annually by the SUBASENLON Fire Department or an outside contractor. The results of these tests will be maintained by the SUBASENLON Fire Department.

L.2.6 Security

At the end of each operating day, the entrance gate, doors, loading bay doorways, and ramp entrance doorway will be inspected for damage and to ensure that they are locked. Locations of the entrance gate, doors, loading bay doorways, and ramp entrance doorway are shown on Figure I-7.

L.2.7 Remedial Action

Any remedial actions taken will be noted on the inspection form (see Section L.2.8). In case of a spill, fire, or explosion, the procedures listed in the HWCP, Appendix M-1, will be followed.

L.2.8 Record Keeping

All inspection records will be kept on site for 3 years from the date of inspection. These records will include the date and time of the inspection, the name of the inspector, any problem(s) found, and the date and type of any repair(s) performed.

Sample inspection checklists are provided in Appendices L-1 through L-6 and comprise the following:

- Appendix L-1 – Daily Hazardous Waste Storage Facility Inspection Report
- Appendix L-2 – Weekly Hazardous Waste Storage Facility Inspection Report
- Appendix L-3 – Hazardous Waste Accumulation Area Daily Inspection Checklist
- Appendix L-4 – Accumulation Area Daily Hazardous Waste Inspection Log
- Appendix L-5 – Hazardous Waste Satellite Site Weekly Inspection Checklist
- Appendix L-6 – Satellite Site Weekly Hazardous Waste Inspection Log

These sample checklists are provided as examples only. The inspection checklists are revised periodically as deemed appropriate by Environmental Division personnel.

L.3 Inspection Schedule for Non-Permitted Hazardous Waste Storage Areas

This section delineates the equipment and structures to be inspected at the non-permitted hazardous waste storage areas, which include the satellite sites and accumulation areas. A summary of inspection items and frequencies for these areas is provided in Table L-3.

Table L-3
Inspection Schedule for Hazardous Waste Accumulation Areas and Satellite Sites

Item for Inspection	Types of Problems	Frequency of Inspection	
		Hazardous Waste Coordinator	Environmental Division Personnel
Accumulation Areas			
Containers			
Condition	Dents, corrosion, leaking	Daily	Quarterly
Tops/bungs	Open when not in use/spillage	Daily	Quarterly
Waste stored	Incompatible with container	Daily	Quarterly
Labels	Missing; missing or illegible accumulation date; old markings present; not labeled "Hazardous Waste"	Daily	Quarterly
Secondary Containment (liquid waste)			
Containment	Damaged or missing	Daily	Quarterly
Containers	Stored outside of containment	Daily	Quarterly
Floor	Spill or spill residue	Daily	Quarterly
Inspections			
Aisle space	Inadequate to reach all containers	Daily	Quarterly
Containers	Stored so inaccessible	Daily	Quarterly
Inspection forms	Not performed daily; not kept on site; not signed; deficiencies not noted/ corrected	Daily	Quarterly

Item for Inspection	Types of Problems	Frequency of Inspection	
		Hazardous Waste Coordinator	Environmental Division Personnel
Contingency Equipment			
Contingency plan	Not prominently posted	Daily	Quarterly
Spill kit	Not maintained	Daily	Quarterly
Communication	No means of communication	Daily	Quarterly
Satellite Sites			
Containers			
Condition	Dents, corrosion, leaking	Weekly	Quarterly
Tops/bungs	Open when not in use/spillage	Weekly	Quarterly
Waste stored	Incompatible with container	Weekly	Quarterly
Labels	Missing; missing or illegible accumulation date; old markings present; not labeled "Hazardous Waste"	Weekly	Quarterly
Secondary Containment (liquid waste)			
Containment	Damaged or missing	Weekly	Quarterly
Containers	Stored outside of containment	Weekly	Quarterly
Floor	Spill or spill residue	Weekly	Quarterly
Inspections			
Aisle space	Inadequate to reach all containers	Weekly	Quarterly
Containers	Stored so inaccessible	Weekly	Quarterly
Inspection forms	Not performed weekly; not kept on site; not signed; deficiencies not noted/ corrected	Weekly	Quarterly
Contingency Equipment			
Spill kit	Not maintained	Weekly	Quarterly
Area			
Capacity	More than 55 gallons hazardous (or 1 quart acutely hazardous) waste present; full containers not moved to accumulation area within 72 hours	Weekly	Quarterly

Oversight inspections performed by the Environmental Division will serve as an internal check only; at a minimum, these inspections will be performed on a quarterly basis. The accumulation area and satellite site inspections performed by each location's Hazardous Waste Coordinator will be performed at the frequencies listed to meet the regulatory requirements. Example inspection logs are provided in Appendices L-3 through L-6.

L.4 Surface Impoundments Inspection

There are no surface impoundments at SUBASENLON; therefore, this section does not apply.

L.5 Waste Pile Inspection

All hazardous waste at SUBASENLON is containerized. Therefore, there are no waste piles, and this section does not apply.

L.6 Land Treatment Inspection

There are no land treatment units at SUBASENLON; therefore, this section does not apply.

L.7 Landfill Inspection

There are no active landfills at SUBASENLON; therefore, this section does not apply.

L.8 Incinerator Inspection

There are no incinerators used to dispose of hazardous waste at SUBASENLON; therefore, this section does not apply.

L.9 Miscellaneous Units Inspection

There are no permitted miscellaneous units at SUBASENLON; therefore, this section does not apply.

L.10 Air Emission Standards for Process Vents Inspection

The HWMF at SUBASENLON does not employ any closed-vent systems; therefore, this section does not apply.

L.11 Air Emission Standards for Equipment Leaks Inspection

The HWMF at SUBASENLON does not employ pumps in light liquid service, compressors, pumps or valves in heavy liquid service, or pressure relief devices in light liquid or heavy liquid service. Therefore, this section is not applicable to SUBASENLON.

L.12 Air Emission Standards for Tanks, Surface Impoundments and Container Inspection

To meet the requirements of 40 CFR 264.1086, SUBASENLON uses Department of Transportation (DOT)-certified performance-oriented packaging (POP) containers for the storage and transportation of hazardous waste in quantities of 26 gallons or greater. The containers are kept closed at all times, except when adding or consolidating waste. The use of POP containers is currently conducted at all satellite sites and accumulation areas and at the HWMF. There are no inspection requirements for DOT-certified containers.

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Appendix L-1
Daily Hazardous Waste Storage Facility Inspection Report

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DAILY HAZARDOUS WASTE STORAGE FACILITY INSPECTION REPORT

Inspector's Name/Title: _____ Date/Time of inspection:_____(MM/DD/YY):_____(Military Time)

Items for inspection	Requirements	Status		Observations	Date & Nature of Repairs Remedial Actions
		Pass	Fail		
1. OUTSIDE AREAS					
Entrance gates and doors	Inspect for damage; ensure locked				
Storm drain	Free of leaves, liquid, debris				
Module signs	Signs describing module contents clearly posted				
Module containment	Free of structural defects, spills and debris				
Module containers	Containers closed and properly labeled				
Roll-off containers	Free of leakage or spill residues				
Roll-off cover	Properly closed and free of tears				
2. STORAGE BAYS					
Labels	Labels complete; accurate				
Containers	Closed, in good condition, free from excessive rust/dents/imperfections; compatible with waste being stored				
Aisle space	Adequate for visible inspection of all containers				
Spills	Free of spills				
Trench	Free of deterioration, liquid, debris				
Segregation	Waste stored in appropriated storage bay				
Drum stacking	Double stacking allowed only in Toxic, Ignitable & CT Reg bays				
Storage capacity - Alkaline	Not to exceed max 1145 gl (solid & liquid) / 935 (liquid)				
Storage capacity - Toxic I	Not to exceed max 4445 gl (solid & liquid) / 1810 (liquid)				
Storage capacity - Toxic II	Not to exceed max 2200 gl (solid & liquid) / 935 (liquid)				
Storage capacity - Ignitable	Not to exceed max 1865 gl (solid & liquid) / 1810 (liquid)				
Storage capacity - Oxidizer	Not to exceed max 1145 gl (solid & liquid) / 935 (liquid)				
Storage capacity - Reactive	Not to exceed max 1130 gl (solid & liquid) / 935 (liquid)				

DAILY HAZARDOUS WASTE STORAGE FACILITY INSPECTION REPORT

Inspector's Name/Title: _____ Date/Time of inspection:_____(MM/DD/YY):_____(Military Time)

Items for inspection	Requirements	Status		Observations	Date & Nature of Repairs Remedial Actions
		Pass	Fail		
Storage capacity - Acid	Not to exceed max 1145 gl (solid & liquid) / 935 (liquid)				
Storage capacity - Universal	Not to exceed max 1100 gl (solid & liquid) / 935 (liquid)				
Storage capacity - CT Regulated	Not to exceed max 18660 gl (solid & liquid) / 10090 (liquid)				
Signs	Inspect for damage and location				
SERVICE AISLE					
Containers	No containers in aisle				
Spills	Free of spills				
PROCESS ROOM					
Spills	Free of spills				
Trench	Free of deterioration, liquid, debris				
Labels	Labels complete; accurate				
Containers	Closed, in good condition, free from excessive rust/dents/imperfections; compatible with waste being stored				
Treatment systems	Secured when not in use				
STAGING AREA					
Log books	Available, accurate, and in good condition				
Emergency exit	Free from obstruction				
Truck parking floor drain	Closed at all times; opened only to allow rainwater to drain				
Spills	Free of spills				
Trench	Free of deterioration, liquid, debris				
Labels	Labels complete; accurate				
Containers	Closed, in good condition, free from excessive rust/dents/imperfections; compatible with waste being stored				
Aisle space	Adequate for visible inspection of all containers				
Bulking process	No more than 8 pallets; Bulk only authorized waste streams				

Appendix L-2
Weekly Hazardous Waste Storage Facility Inspection Report

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WEEKLY HAZARDOUS WASTE STORAGE FACILITY INSPECTION REPORT

Inspector's Name/Title: _____ Date/Time of inspection:_____(MM/DD/YY):_____(Military Time)

Items for inspection	Requirements	Status		Observations	Date & Nature of Repairs Remedial Actions
		Pass	Fail		
1. RECORDKEEPING					
Daily inspection log	Site inspected daily and signed inspection reports maintained				
Personnel training records	Training records complete and up-to-date				
2. EMERGENCY EQUIPMENT					
Emergency eyewash and shower	Inspect for damage and function				
Fire extinguishers	Inspect for damage and location				
Personal protective equipment	Inspect for damage and availability				
Communication systems (telephones/cell phones)	Inspect for damage or low charge				
Spill clean-up equipment	Inspect for availability and operational status				
Signs	Inspect for damage and location				
3. HOUSEKEEPING					
Interior areas	Free of spills, debris, refuse, or stains				
Loading/unloading areas	Free of spills, debris, refuse, over accumulation of cardboard, stains, or leaves				
Asphalt areas	Free of spills, debris, refuse, stains, leaves, or excessive snow				
Storm water collection system	Free of spills and debris				
4. CAPACITY					
Storage bays	Waste in storage is not more than 100% permitted capacity (attach database inventory)				

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Appendix L-3
Hazardous Waste Accumulation Area Daily Inspection Checklist

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EXAMPLE ONLY

HAZARDOUS WASTE (HW) ACCUMULATION AREA CHECKLIST
DAILY INSPECTION

COORDINATOR:	SITE#:	BUILDING:

1. CONTAINERS
a. In good condition - no dents or corrosion, tops of containers free of spillage.
b. All tops/bungs/vents closed when not in use.
c. Containers compatible with material to be stored.
d. Containers >26 gl. containing VOCs are DOT approved.
2. PROFILES/LABELS
a. Profile list is in binder and is not more than 6 months old.
b. All profiles used are on site profile list or base-wide list.
c. All RCRA-regulated HW containers labeled w/ "Hazardous Waste" label. All state regulated waste labeled w/ "State Regulated Waste" label.
d. Profiled waste containers labeled w/the correct profile information as listed on current profile list. New waste stream containers labeled w/the waste identification including words to identify hazards/contents and the waste codes. All labels include Site# and Coordinator name.
e. All labels clean and legible. Containers free of markings associated with past use.
f. Accumulation start date on label and <60 days old.
3. SECONDARY CONTAINMENT
a. Liquid HW containers have adequate secondary containment. (10% of total volume or equal to largest container capacity, whichever is greater).
b. All liquld HW containers positioned to not overhang the edge of containment.
c. Containment area free from cracks and other damage.
d. Containment area clean and free of spill residue, rags, leaves, ropes, rainwater and other debris.
4. SEGREGATION
a. Flammables, corrosives, oxidizers and reactive material, and any unknowns, stored in separate secondary containment.
5. INSPECTIONS/RECORDS
a. Adequate aisle space provided to inspect all containers, and containers stored such that all containers and labels are visible for inspection.
b. Site inspected at least daily, and a signed inspection log maintained for a period of not less than 3 years. Corrective action taken and annotated for all inspection deficiencies.
c. Annual training certificates for pri/alt coordinators and substitutes in site binder, and retained for at least three years.
6. CONTINGENCY EQUIPMENT
a. Accumulation Area sign prominently posted, with emergency contact and phone number correct.
b. Clearly labeled spill kit maintained at the site. (Minimum of a broom, dustpan, plastic bag and absorbent material appropriate for waste types at the site).
c. Charged fire extinguisher readily available.
d. Contingency plan prominently posted containing area map indicating locations of nearest fire alarm, fire fighting equipment, phone and spill kit.
e. Telephone, fire alarm or hand-held radio readily available and working to summon emergency help.
f. Written procedure to notify the Fire Department in place if there is no telephone or fire alarm.

Checklist Instructions

1. Review each item daily
2. Correct any/all items discovered
3. Sign daily site inspection log
4. Input date/time of inspection
5. Annotate any observations and corrections made

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Appendix L-4
Accumulation Area Daily Hazardous Waste Inspection Log

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ACCUMULATION AREA DAILY HAZARDOUS WASTE INSPECTION LOG

BLDG_____SHOP/CODE_____ MONTH/YEAR _____ACCUMMULATION AREA_____

	INSPECTOR'S NAME/SIGNATURE*	DATE	TIME	OBSERVATIONS MADE/CORRECTIVE ACTION AND DATE
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
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21				
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23				
24				
25				
26				
27				
28				
29				
30				
31				

NOTE: (2) THIS REPORT MUST BE KEPT ON FILE AT THE SITE FOR THREE YEARS FROM DATE COMPLETED SOPA(ADMIN) NLONINST 5090.2C

CONTINUE COMMENTS ON BACK AS NEEDED

***By signing this form, the individual denotes that the Accumulation Area HW Checklist was used to complete the inspection.**

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Appendix L-5
Hazardous Waste Satellite Site Weekly Inspection Checklist

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EXAMPLE ONLY

HAZARDOUS WASTE (HW) SATELLITE SITE CHECKLIST
WEEKLY INSPECTION

COORDINATOR: SITE#: BUILDING:

1. CONTAINERS
a. Satellite site is located at or near the point of generation of each waste.
b. No more than one container per RCRA-regulated waste stream is present.
c. In good condition - no dents or corrosion, tops of containers free of spillage.
d. All tops/bungs/vents closed when not in use.
e. Containers compatible with material to be stored.
f. Containers >26 gl. containing VOCs are DOT approved.
2. PROFILES/LABELS
a. Profile list is in binder and is not more than 6 months old.
b. All profiles used are on site profile list or base-wide list.
c. All RCRA-regulated HW containers labeled w/ "Hazardous Waste" label. All state regulated waste labeled w/ "State Regulated Waste" label.
d. Profiled waste containers labeled w/the correct profile information as listed on current profile list. New waste stream containers labeled w/the waste identification including words to identify hazards/contents and the waste codes. All labels included Site# and Coordinator name.
e. All labels clean and legible. Containers free of markings associated with past use.
3. SECONDARY CONTAINMENT
a. Liquid HW containers have adequate secondary containment. (10% of total volume or equal to largest container capacity, whichever is greater).
b. All liquid HW containers positioned to not overhang the edge of containment.
c. Containment area free from cracks and other damage.
d. Containment area clean and free of spill residue, rags, leaves, ropes, rainwater and other debris.
4. SEGREGATION
a. Flammables, corrosives, oxidizers and reactive material, and any unknowns, stored in separate secondary containment.
5. CAPACITY
a. No more than 55 gallons of RCRA-regulated HW present, (or 1 quart of acutely hazardous waste).
b. If 55 gallon (or 1 quart) limit is reached, movement of excess to accumulation area or TSDF scheduled to take place within 72 hours to reduce amount to <55 gallons.
6. INSPECTIONS/RECORDS
a. Adequate aisle space provided to inspect all containers, and containers stored such that all containers and labels are visible for inspection.
b. Site inspected at least weekly, and a signed inspection log maintained for a period of not less than 3 years. Corrective action taken and annotated for all inspection deficiencies.
c. Annual training certificates for pri/alt coordinators and substitutes in site binder for at least three years.
7. CONTINGENCY EQUIPMENT
a. Satellite site sign prominently posted, with energency contact and phone number correct.
b. Clearly labeled spill kit maintained at the site. (Minimum of a broom, dustpan, plastic bag and absorbent material appropriate for waste types at the site).

Checklist Instructions

1. Review each item weekly ***Weekly means maximum 7 days between inspections.***
2. Correct any/all items discovered
3. Sign weekly site inspection log
4. Input date/time of inspection
5. Annotate any observations and corrections made

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Appendix L-6
Satellite Site Weekly Hazardous Waste Inspection Log

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SATELLITE WEEKLY HAZARDOUS WASTE SITE INSPECTION LOG

BLDG_____SITE_____ YEAR _____SHOP/CODE_____

INSPECTOR'S NAME/SIGNATURE*	DATE	TIME	OBSERVATIONS MADE/CORRECTIVE ACTION AND DATE
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			

NOTE: (2) THIS REPORT MUST BE KEPT ON FILE AT THE SITE FOR THREE YEARS FROM DATE COMPLETED SOPA(ADMIN) NLONINST 5090.2C CONTINUE COMMENTS ON BACK AS NEEDED

***By signing this form, the individual denotes that the Satellite HW Checklist was used to complete the inspection.**

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ATTACHMENT C

PERSONNEL TRAINING PLAN
(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

Attachment O – Personnel Training

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
CT DEEP	Connecticut Department of Energy and Environmental Protection
DLA	Defense Logistics Agency
DOT	Department of Transportation
EPA	United States Environmental Protection Agency
HAZWOPER	Hazardous Waste Operations and Emergency Response
HWMF	Hazardous Waste Management Facility
ICP	Integrated Contingency Plan
NAVFAC	Naval Facilities Engineering Command
OSHA	Occupational Safety and Health Administration
RCRA	Resource Conservation and Recovery Act
SDS	Safety data sheet
TSDF	Treatment, storage, and disposal facility

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O.1 Regulatory Requirements

Federal and state regulations require owners or operators of a Hazardous Waste Management Facility (HWMF) to prepare an outline of introductory and continuing training programs to prepare persons to operate or maintain the HWMF in a safe manner. The regulatory requirements contained in 40 Code of Federal Regulations (CFR) 264.16 regarding employee training are as follows:

- Facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the regulatory requirements.

- This program must be directed by a person trained in hazardous waste management procedures and will include instructions that teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

- At a minimum, the training program must be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems, including, where applicable:

    - Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment.

    - Key parameters for automatic waste feed cutoff systems.

    - Communications or alarm systems.

    - Response to fires or explosions.

    - Response to groundwater contamination incidents.

    - Shutdown of operations.

- Facility personnel must successfully complete the training program within 6 months of their assignment to the facility and must take part in an annual review of the program.

- Facility personnel engaged in hazardous waste activities must not work in unsupervised positions until their training is complete.

- The owner or operator must maintain the following documents and records at the facility:

    - The job title for each position at the facility related to hazardous waste management.

    - The name of the employee filling each job.

    - A written job description for each position, including the requisite skills, education, or other qualifications, and duties of employees assigned to each position.

    - A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.

    - Records that document that the training or job experience required by 40 CFR 264.16(a), (b), and (c) have been given to, and completed by, facility personnel.

- Training records on current personnel must be kept until closure of the facility and training records on former employees must be kept for at least 3 years from the date the employee last worked at the facility.

O.2 Position Descriptions

Provided in Sections O.2.1 through O.2.4 are written descriptions for each hazardous waste position at SUBASENLON. Included in the job descriptions are the SUBASENLON personnel's duties, training requirements, and requisite skills, education, or other qualifications.

Military personnel’s duties can be changed a number of times during their tenure at SUBASENLON. Therefore, any list of personnel filling the positions listed in Sections O.2.1 through O.2.4 would soon become outdated. Consequently, to comply with 40 CFR 264.16(d)(1), SUBASENLON's Environmental Division maintains an electronic listing of the latest training programs provided to all Hazardous Waste Coordinators. This program is used to verify that all personnel have received their required training. The Environmental Division reviews this list at least monthly, and personnel are notified

either verbally or in writing of their training deadline and the next available training seminar. All HWMF personnel training records are kept at the HWMF administrative office.

O.2.1 Accumulation Area/Satellite Site Hazardous Waste Coordinator and Alternates

O.2.1.1 Duties

Accumulation Area/Satellite Site Hazardous Waste Coordinators are responsible for:

- Collection and proper storage of hazardous waste at the shop level and at accumulation areas and satellite sites.

- Ensuring that proper containerization, labeling, and time/quantity requirements are met.

- Awareness of the safety, spill response, and hazardous waste management responsibilities pertinent to the position.

O.2.1.2 Training

Hazardous Waste Coordinators are required to complete initial Hazardous Waste Coordinator Training and annual refresher training. The required training courses may change as a result of SUBASENLON policy or new regulation.

O.2.1.3 Requisite Skills/Education/Other Qualifications

Hazardous Waste Coordinators must complete Hazardous Waste Coordinator Training.

O.2.2 Hazardous Waste Program Manager

O.2.2.1 Duties

The Hazardous Waste Program Manager is responsible for:

- Overall hazardous waste management, waste profiling, and teaching the Hazardous Waste Coordinator Training.

- Supervision of all facility personnel and management of the HWMF.

- Establishment and maintenance of a regular waste pick-up service for SUBASENLON and its tenants.

- Ensuring that wastes are prepared for off-site shipment to a disposal facility in accordance with all applicable United States Environmental Protection Agency (EPA) and Department of Transportation (DOT) transportation regulations including consolidation, repackaging, and labeling.

- Performing long-range planning for hazardous waste reduction, recycling, and reclamation strategies.

- Maintaining routine liaison with Naval Facilities Engineering Command (NAVFAC), EPA, and Connecticut Department of Energy and Environmental Protection (CT DEEP) regarding hazardous waste inspections, rule interpretation, and problem resolution.

- Maintaining competence in all applicable hazardous waste rules and regulations.

- Coordinating contractual agreements for sorting, packing, transfer, and/or disposal of hazardous waste as needed.

- Coordinating preparation of hazardous waste reports and hazardous waste compliance documentation as required by EPA, CT DEEP, and Navy policy.

O.2.2.2 Training

The following training is required of the Hazardous Waste Program Manager:

- Occupational Safety and Health Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) Course, 29 CFR 1910.120(e), (p)(7), and (q)(6) – initial training and annual refresher training.

- Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal facility (TSDF) Hazardous Waste Regulations Course, 40 CFR 264.16(a) – initial training and annual refresher training, including TSDF specific contingency plan annual refresher.

- DOT 49 CFR 172 to 177 Packaging and Transportation Course – initial training and biannual refresher training.

Listed training courses may change as a result of SUBASENLON policy or new regulation.

O.2.2.3 Requisite Skills/Education/Other Qualifications

The Hazardous Waste Program Manager must meet the following qualifications:

- High school diploma
- Minimum 2 years' experience in the hazardous waste field

O.2.3 Hazardous Waste Division Environmental Protection Specialists

O.2.3.1 Duties

Hazardous Waste Division Environmental Protection Specialists are responsible for:

- Pick-up of waste from accumulation areas and satellite sites, including ensuring that each container is in good condition and properly labeled.

- Delivering waste to the HWMF and storing it in properly segregated locations (storage bays) while awaiting transfer by a contractor to a certified off-site disposal facility.

- Awareness of the requirements governing proper packaging, spill response, and safety when working with hazardous waste.

- Maintaining the HWMF waste receipt logbook.

- Performing oversight inspections of accumulation areas and satellite sites.

- Teaching the Hazardous Waste Coordinator Training.

O.2.3.2 Training

The following training is required of Hazardous Waste Division Environmental Protection Specialists:

- OSHA HAZWOPER Course, 29 CFR 1910.120(e), (p)(7), and (q)(6) – initial training and annual refresher training.

- RCRA TSDF Hazardous Waste Regulations Course, 40 CFR 264.16(a) – initial training and annual refresher training, including TSDF specific contingency plan annual refresher.

- DOT 49 CFR 172 to 177 Packaging and Transportation Course – initial training and biannual refresher training.

Listed training courses may change as a result of SUBASENLON policy or new regulation.

O.2.3.3 Requisite Skills/Education/Other Qualifications

Hazardous Waste Division Environmental Protection Specialists must meet the following qualifications:

- Six months of supervised on-the-job training
- Minimum 1 year of experience in a related field

O.2.4 Environmental Engineering Technician

O.2.4.1 Duties

Environmental Engineering Technicians are responsible for:

- Manifest tracking system management and coordination including generation of exception reports to EPA/CT DEEP.

- Generating deficiency reports and follow-up for oversight inspections of accumulation areas and satellite sites.

- Computerizing SUBASENLON profiles of wastes generated and matching those profiles to the manifest documents for accuracy of waste classification.

- Generating reports of wastes generated as required by the SUBASENLON Environmental Division, Hazardous Waste Program Manager, and EPA/CT DEEP.

- Maintaining waste profile and safety data sheet (SDS) filing systems and Defense Logistics Agency (DLA) Disposition Services turn-in document data.

- Coordination with DLA Disposition Services to facilitate efficient disposal action of SUBASENLON waste.

- Teaching the Hazardous Waste Coordinator Training.

O.2.4.2 Training

The following training is required of Environmental Engineering Technicians:

- Hazardous Waste Coordinator Training – initial training and annual refresher training.

- RCRA TSDF Hazardous Waste Regulations Course, 40 CFR 264.16(a) – initial training and annual refresher training, including TSDF specific contingency plan annual refresher.

- DOT 49 CFR 172–177 Packaging and Transportation Course – initial training and biannual refresher training.

Listed training courses may change as a result of SUBASENLON policy or new regulation.

O.2.4.3 Requisite Skills/Education/Other Qualifications

Environmental Engineering Technicians must meet the following qualifications:

- High school diploma
- One year of training in a related field

O.3 Training Programs

As indicated in Section O.2, all Hazardous Waste Coordinators and alternates and Environmental Engineering Technicians receive the initial Hazardous Waste Coordinator Training within the first 6 months of their employment or assignment to a hazardous waste position. Depending on the individual's position and specific duties, he or she will also receive the initial RCRA Regulations Course within the first 6 months of his or her employment or assignment to a specific hazardous waste job title.

Table O-1 summarizes the types of training, by job title, provided to SUBASENLON employees who take part in hazardous waste and State-regulated waste management. All training programs, except the Hazardous Waste Coordinator Training, are currently conducted by professionally trained third parties (i.e., consultants). The Hazardous Waste Coordinator Training and any future training programs conducted by SUBASENLON are conducted by the Environmental Division.

The subsections that follow provide a brief description of each training program.

Table O-1
Training Requirements

Training Course	Hazardous Waste Coordinator (O.2.1)	Hazardous Waste Program Manager (O.2.2)	Hazardous Waste Specialist (O.2.3)	Hazardous Waste Technician (O.2.4)
SUBASENLON Hazardous Waste Coordinator Training: Initial and Annual Refresher	X			X
OSHA 29 CFR 1910.120 HAZWOPER Course: Initial (minimum 24 hours) and Annual Refresher (8 hours), including: • (e) – General • (p)(7) – TSDF Operations • (q)(6) – Emergency Response to Hazardous Substance Releases		X	X	
40 CFR 264.16(a) RCRA TSDF Hazardous Waste Regulations Course: Initial and Annual Refresher, including TSDF Specific Contingency Plan Annual Refresher		X	X	X
49 CFR 172–177 DOT Packaging and Transportation Course: Initial and Biannual Refresher		X	X	X

O.3.1 Hazardous Waste Coordinator Training

All Hazardous Waste Coordinators and Environmental Engineering Technicians will attend the initial Hazardous Waste Coordinator Training prior to assuming duties and will attend refresher training on an annual basis. This requirement applies to primary and alternate Hazardous Waste Coordinators as well as any other personnel who perform hazardous waste inspections.

O.3.2 OSHA

Specific requirements for training in compliance with the requirements of 29 CFR 1910.120(e), 29 CFR 1910.120(p) – TSDF operations, and 29 CFR 1910.120(q) – emergency response are covered in the SUBASENLON Integrated Contingency Plan (ICP) (NAVFAC, 2016).

Environmental Division hazardous waste personnel must complete training in compliance with 29 CFR 1910.120(p) requirements within 6 months of their assignment to a new position involving hazardous waste handling. These personnel also function as members of the Emergency Response Team and are required to receive training at the hazardous materials technician level (29 CFR 1910.120(q)(6)(iii)) and as post-emergency responders (29 CFR 1910.120(q)(11)(ii)).

All Hazardous Waste Coordinators are required to receive training at the first responder awareness level (29 CFR 1910.120(q)(6)(i)). This training is provided as part of the Hazardous Waste Coordinator initial and annual refresher training.

O.3.3 RCRA

RCRA regulations include personnel training requirements designed to reduce the potential for mistakes and accidents at hazardous waste facilities that might threaten human health or the environment. The purpose of these programs is to ensure that workers are adequately prepared to properly manage hazardous waste and respond to any emergencies.

As a large quantity generator of hazardous waste and an operator of a permitted HWMF, SUBASENLON is required to have a written training plan for personnel involved with hazardous waste management that teaches them to perform their duties in a way that ensures compliance with the regulations as defined in 40 CFR 264.16(a).

All Hazardous Waste Coordinators receive RCRA training as part of the Hazardous Waste Coordinator initial and annual refresher classes provided by SUBASENLON Environmental Division. SUBASENLON Environmental Division personnel also receive contractor-provided RCRA training.

O.3.4 DOT

DOT regulations, 49 CFR 172, specify that a hazardous materials employee who performs any function regulated under 49 CFR Subpart C must be instructed in the requirements that apply to that function. Environmental Division hazardous waste personnel are responsible for the shipment of hazardous waste and are therefore required to be trained in all aspects of Subpart C related to classification, description, packaging, marking, and labeling of hazardous waste. No SUBASENLON personnel are authorized to transport hazardous waste on public roads.

DOT regulations require refresher training at least every 3 years; however, Navy policy requires DOT training every 2 years. Training is provided by contractors.

Environmental Division personnel who receive the required DOT training are authorized to sign the Uniform Hazardous Waste Manifest that accompanies each hazardous waste shipment. All other personnel are forbidden to sign manifests for any waste leaving SUBASENLON. Manifest requirements are discussed in detail in Attachment J, Process Design and Operating Criteria, Section J.6, Manifest Processing.

O.4 Training Records

All training records provided to SUBASENLON personnel are maintained at the SUBASENLON HWMF. Training records for current personnel are kept until closure of the facility. Training records for former personnel are kept for at least 3 years from the date they leave the base or are reassigned to a duty that does not involve hazardous waste management. An example of the training certificate provided to SUBASENLON personnel that complete the Hazardous Waste Coordinator Training is provided as Figure O-1. The current training slides are provided as Appendix O-1.

O.5 References

NAVFAC (Naval Facilities Engineering Command), 2016. Integrated Contingency Plan, Naval Submarine Base New London, Groton, Connecticut. May.

Figure O-1
Example Hazardous Waste Coordinator Training Certificate

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Appendix O-1
Hazardous Waste Coordinator Training Slides

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HAZARDOUS WASTE COORDINATOR TRAINING

Naval Submarine Base New London

NAVFAC PWD Environmental Division / Hazardous Waste Branch

1

ENVIRONMENTAL MANAGEMENT SYSTEM (EMS)

POLICY GOALS

- Exceed all applicable legal requirements.
- Minimize adverse affects on the environment.
- Practice conservation through recycling initiatives and recycled material purchasing.
- Strive to continuously improve environmental performance.
- Employ waste source reduction and sustainable practices.

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AGENDA

I INTRODUCTION - HAZARDOUS WASTE LAWS
II IDENTIFICATION OF HAZARDOUS WASTE
III LIST OF AUTHORIZED HAZARDOUS WASTE PROFILES
IV TYPES OF HAZARDOUS WASTE STORAGE AREAS
V ROLE OF THE HAZARDOUS WASTE COORDINATOR
- A. SITE MANAGEMENT
- B. INSPECTIONS
- C. CONTAINER MANAGEMENT
- D. WASTE OR EXPIRED MATERIAL PROFILING REQ'S
- E. LABELING
- F. TURN IN PROCEDURES
- G. RECORD KEEPING
- H. TRAINING
- I. SAFETY
- J. INCIDENT CONTROL
- K. COMMON INSPECTION FINDINGS

VI RECYCLABLE MATERIAL STORAGE REQ'S
VII SPECIAL PROGRAMS/ TURN IN PROCEDURES
VIII ROLE OF THE ENVIRONMENTAL DEPARTMENT

3

I. INTRODUCTION - HAZARDOUS WASTE LAWS

RESOURCE CONSERVATION AND RECOVERY ACT

Life before RCRA Presentation…

1976 ESTABLISHED

Purpose is to protect human health and the environment from improperly managed waste.

1984 AMENDED

Hazardous and solid waste amendments added:

1. Land disposal restrictions for hazardous & non-hazardous liquids

2. Underground storage tank regulations

3. Waste minimization rules for generators

4

RCRA

RESOURCE CONSERVATION AND RECOVERY ACT

RCRA REGULATES AND TRACKS HW FROM "CRADLE TO GRAVE" - POINT OF GENERATION TO FINAL TREATMENT OR DISPOSAL.

5

II. IDENTIFICATION OF HAZARDOUS WASTE

LISTED: (40 CFR 261 Subpart D) Hazardous based on source of waste, not on criteria.

Spent materials/Mfg. Wastes:
1. ***F-List*: General industry, non-specific sources, commonly used solvents.**

Unused/Off Spec Chemicals:
2. *P-List*: Acutely hazardous chemicals.

3. *U-List*: Other hazardous chemicals.

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II. IDENTIFICATION OF HAZARDOUS WASTE

CONNECTICUT REGULATED

NON-RCRA regulated waste but regulated by CT DEEP to ensure proper disposal:

- **CR01 Waste PCBs**
- **CR02 Waste Oil**
- **CR04 Waste Chemical Liquid**
- **CR05 Waste Chemical Solid**

If waste is a result of a process, or is an expired material with an MSDS, it will be regulated by CT DEEP.

7

II. IDENTIFICATION OF HAZARDOUS WASTE

CHARACTERISTIC

Based on criteria that can be measured or tested. Waste is hazardous if it meets the criteria.

D001
Ignitable

a. **Is a liquid and has a flash point <60 ° C (<140 ° F).**
b. **Spontaneously combustible solid**
c. **Ignitable compressed gas**
d. **Oxidizer**

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II. IDENTIFICATION OF HAZARDOUS WASTE

CHARACTERISTIC

Based on criteria that can be measured or tested. Waste is hazardous if it meets the criteria.

D002
Corrosive

a. pH ≤ 2 or pH ≥ 12.5

9

II. IDENTIFICATION OF HAZARDOUS WASTE

CHARACTERISTIC

Based on criteria that can be measured or tested. Waste is hazardous if it meets the criteria.

D003
Reactive

a. Unstable - May be explosive. Reacts violently with water or forms explosive mixtures with water.
b. Cyanide or sulfur bearing waste.

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II. IDENTIFICATION OF HAZARDOUS WASTE

CHARACTERISTIC

Based on criteria that can be measured or tested. Waste is hazardous if it meets the criteria.

D004-D043
Toxicity

a. **Concentration of any one of the contaminants exceeds regulatory limit as determined by Toxicity Characteristic Leachate Procedure (TCLP) test.**

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II. IDENTIFICATION OF HAZARDOUS WASTE

MIXED WITH/DERIVED FROM RULE: If listed (F, K, U, P) waste is mixed with or derived from other waste, the combined waste is now listed HW.

For example, Spent Acetone is a 'U' Coded Waste. A spill of Spent Acetone mixed with speedy dry would also carry the 'U' Code.

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II. IDENTIFICATION OF HAZARDOUS WASTE

EXCLUDED

Excluded from the HW regulatory requirements:

1. Household Waste - does not apply to SUBASENLON, but does apply to Housing
2. Industrial Wastewater Discharges - covered under Clean Water Act (CWA) permitting process
3. Environmental Samples

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IV. TYPES OF HAZARDOUS WASTE STORAGE AREAS

FOUR TYPES OF STORAGE AREAS AT SUBASENLON REGULATED BY EPA AND THE CTDEEP:

1. **SATELLITE SITE (Site ID begins with "S"):**
   ***Temporary area at or near the point of generation which is under the control of the operator of the process generating the waste*.**

   Limits: (Controlled by volume)
   - **55 gallons or full container of hazardous waste or 1 quart of acutely hazardous waste (P-listed).**
   - **Only one container per hazardous waste (profile/stream) is allowed.**
   - **No restriction on number of CT Reg containers.**
   - **No restriction on storage time, however, recommended time limit is one year.**
   - **An SAA may collect various types of waste from the same process in separate containers as long as the total quantity of HW in the SAA does not exceed 55 gallons per waste stream.**

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IV. TYPES OF HAZARDOUS WASTE STORAGE AREAS

2. **ACCUMULATION SITES (Site ID begins with "A"):**
   Limits: (controlled by Time)
   - **Short term storage (<60 days) of HW**
   - **Unlimited quantity of HW from one or more shops.**

3. **PERMITTED TSDF (B-562):**
   Long term storage (<1 year) of up to 13,000 gallons of hazardous waste.

4. **NON-RCRA REGULATED AREAS :**
   Storage of NON-RCRA State regulated wastes only.
   No restriction on storage time, however, recommended time limit is one year.

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IIa. Universal Waste Rule

What wastes are subject to the Universal Waste Rule?

There are four waste streams that can be managed as a universal waste in Connecticut. These universal wastes are:

1. **Batteries**
2. **Mercury-containing thermostats**
3. **Pesticides**
4. **Lamps (fluorescent, LED, neon and mercury vapor lamps)**

How long can I store Universal Wastes on-site?

A generator can store a universal waste on-site for no longer than six months from the date the universal waste is generated.

Used Electronics are managed as scrap metal though DRMO.

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III. LIST OF AUTHORIZED WASTE STREAM PROFILES

A. LIST PREPARED BY ENVIRONMENTAL DEPARTMENT

SITE SPECIFIC LIST - each site may use only profiles assigned to that specific site

BASE-WIDE LIST - common waste streams, all SUBASE may use profiles

B. LIST INCLUDES:

SITE ID#
PROFILE #
WASTE DESCRIPTION
WASTE CODE - EPA OR STATE
SOLID/LIQUID
LABEL (B=BLUE, W=WHITE "6X9", UW=WHITE "4X4")
SEGREGATION CODE
REVIEW DATE (Last time it was reviewed)
REVIEW REQUIRED

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3/20/2016

SUBASENLON: Authorized Accumulation/Satellite Areas
Current Area Coordinators and Authorized Waste Stream Profiles

1

AREA: S70 COMMAND: SUBASE BLDG: B-462 SHOP: PUBLIC SAFETY/SECURITY

TURN IN SITE: PRIMARY HWC: FOX, PATRICIA PHONE PRI: 4387 ALTERNATE HWC: DAVID, KODY PHONE ALT: 3376

Not to exceed one year

PROFILE #	POINT OF GENERATION	WASTE STREAM DISCRIPTION	WASTE CODE	SOLID LIQUID	LABEL	SEG CODE	LAST REVIEW DATE
P0895	S-70	NEUTRALIZED DRUG TEST KITS - TEST G/ TEST E/ TEST K/ TEST M (SELENIUM/CHLOROFORM)	D010/D022	SOLID	HW	T	12/16/2015
P0899	S-70	NEUTRALIZED DRUG TESTS - TEST A/ TEST B	CR05	SOLID	STATE	C	12/16/2015
P1204D	B-462, ROOM 112	CLEANER, LUBRICANT AND PRESERVATIVE DEBRIS	CR05	SOLID	STATE	C	11/30/2015
P1491	S-70	WASTE LSD TEST KIT -D (ACID)	D002	LIQUID	HW	A	12/16/2015
P1493	S-70	TEST KIT U, METHAMPHETAMINE (REACTIVE CYANIDE, FLAM)	D001/D003	LIQUID	HW	R	12/16/2015

SEGREGATION CODES
A=Acid, B=Base, C=NonReg, F=Flammable, O=Oxidizer, T=Toxic, P=Pcb, R=Reactive, X=Not Permitted
** If "Rev Due" is yes, you must submit a B=1 the next time it is turned in.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

A. SITE MANAGEMENT

1. **Authorization from Environmental Department to establish / disestablish site.**
2. **One trained primary and at least one trained alternate coordinator assigned to the site; assignment letters submitted to Env. Dept.**
3. **Accumulation/Satellite site sign or placard with emergency contact and phone number. A "No Smoking" sign must be posted at each site.**
4. **Clearly labeled spill kit appropriate for the type of waste stored. Minimum spill kit includes a broom, dustpan, plastic bag and sorbent material.**

Additional requirements for accumulation sites only:

1. **Charged fire extinguisher**
2. **Contingency plan prominently posted containing area map indicating locations of nearest fire alarm, fire fighting equipment, phone and spill kit.**
3. **Telephone, fire alarm or hand-held radio readily available to summon help.**

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

B. INSPECTIONS

1. **CONDUCT INSPECTIONS:**
   Accumulation Site: **Daily inspections**

   Satellite Site: **Weekly inspections (7 days)**
   (7 DAYS MAXIUM BETWEEN INSPECTIONS)

Current HW coordinator training certificates must be in binder for anyone who signs the inspection sheet: current and past primary/alternate or other HW coordinator acting as substitute.

No one is to sign the inspection sheet w/o a current HW coordinator training certificate in the binder!

2. **CORRECTIVE ACTION - Correct deficiencies found during daily/weekly coordinator inspections and periodic Environmental Dept. oversight inspections.**

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HAZARDOUS WASTE (HW) SATELLITE AREA CHECKLIST *WEEKLY INSPECTION*

COORDINATOR:	SITE#:	BUILDING:
1. CONTAINERS		
a. Satellite site is located at or near the point of generation of each waste.		
b. No more than one container per RCRA-regulated waste stream is present.		
c. In good condition - no dents or corrosion, tops of containers free of spillage.		
d. All tops/bungs/vents closed when not in use.		
e. Containers compatible with material to be stored.		
f. Containers >26 gl. containing VOCs are DOT approved.		
2. PROFILES/LABELS		
a. Profile list is in binder and is not more than 6 months old.		
b. All profiles used are on site profile list or base-wide list.		
c. All RCRA-regulated HW containers labeled w/ "Hazardous Waste" label. All state regulated waste labeled w/ "State Regulated Waste" label.		
d. Profiled waste containers labeled w/the correct profile information as listed on current profile list. New waste stream containers labeled w/the waste identification including words to identify hazards/contents and the waste codes. All labels included Site# and Coordinator name.		
e. All labels clean and legible. Containers free of markings associated with past use.		
3. SECONDARY CONTAINMENT		
a. Liquid HW containers have adequate secondary containment. (10% of total volume or equal to largest container capacity, whichever is greater).		
b. All liquid HW containers positioned to not overhang the edge of containment.		
c. Containment area free from cracks and other damage.		
d. Containment area clean and free of spill residue, rags, leaves, ropes, rainwater and other debris.		
4. SEGREGATION		
a. Flammables, corrosives, oxidizers and reactive material, and any unknowns, stored in separate secondary containment.		
5. CAPACITY		
a. No more than 55 gallons of RCRA-regulated HW present, (or 1 quart of acutely hazardous waste).		
b. If 55 gallon (or 1 quart) limit is reached, movement of excess to accumulation area or TSDF scheduled to take place within 72 hours to reduce amount to <55 gallons.		
6. INSPECTIONS/RECORDS		
a. Adequate aisle space provided to inspect all containers, and containers stored such that all containers and labels are visible for inspection.		
b. Site inspected at least weekly, and a signed inspection log maintained for a period of not less than 3 years. Corrective action taken and annotated for all inspection deficiencies.		
c. Annual training certificates for pri/alt coordinators and substitutes in site binder for at least three years.		
7. CONTINGENCY EQUIPMENT		
a. Satellite Area sign prominently posted, with energency contact and phone number correct.		
b. Clearly labeled spill kit maintained at the site. (Minimum of a broom, dustpan and absorbent material appropriate for waste types at the site).		

Checklist Instructions
1. Review each item weekly ***Weekly means maximum 7 days between inspections.***
2. Correct any/all items discovered
3. Sign weekly site inspection log
4. Input date/time of inspection
5. Annotate any observations and corrections made

SATELLITE WEEKLY HAZARDOUS WASTE SITE INSPECTION LOG

BLDG_____SITE_____ YEAR _____SHOP/CODE_____

INSPECTOR'S NAME/SIGNATURE*	DATE	TIME	OBSERVATIONS MADE/CORRECTIVE ACTION AND DATE
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			
Month			
WK 1			
WK 2			
WK 3			
WK 4			
WK 5			

NOTE: (2) THIS REPORT MUST BE KEPT ON FILE AT THE SITE FOR THREE YEARS FROM DATE COMPLETED SOP(A/ADMIN) NLCNINST 5090.2C CONTINUE COMMENTS ON BACK AS NEEDED

***By signing this form, the individual denotes that the Satellite HW Checklist was used to complete the inspection.**

Appendix O-1 - Hazardous Waste Coordinator
Training Slides

HAZARDOUS WASTE (HW) ACCUMULATION AREA CHECKLIST
DAILY INSPECTION

COORDINATOR:	SITE#:	BUILDING:
1. CONTAINERS		
a. In good condition – no dents or corrosion, tops of containers free of spillage.		
b. All tops/bungs/vents closed when not in use.		
c. Containers compatible with material to be stored.		
d. Containers >26 gl. containing VOCs are DOT approved.		
2. PROFILES/LABELS		
a. Profile list is in binder and is not more than 6 months old.		
b. All profiles used are on site profile list or base-wide list.		
c. All RCRA-regulated HW containers labeled w/ "Hazardous Waste" label. All state regulated waste labeled w/ "State Regulated Waste" label.		
d. Profiled waste containers labeled w/the correct profile information as listed on current profile list. New waste stream containers labeled w/the waste identification including words to identify hazards/contents and the waste codes. All labels include Site# and Coordinator name.		
e. All labels clean and legible. Containers free of markings associated with past use.		
f. Accumulation start date on label and <60 days old.		
3. SECONDARY CONTAINMENT		
a. Liquid HW containers have adequate secondary containment. (10% of total volume or equal to largest container capacity, whichever is greater).		
b. All liquid HW containers positioned to not overhang the edge of containment.		
c. Containment area free from cracks and other damage.		
d. Containment area clean and free of spill residue, rags, leaves, ropes, rainwater and other debris.		
4. SEGREGATION		
a. Flammables, corrosives, oxidizers and reactive material, and any unknowns, stored in separate secondary containment.		
5. INSPECTIONS/RECORDS		
a. Adequate aisle space provided to inspect all containers, and containers stored such that all containers and labels are visible for inspection.		
b. Site inspected at least daily, and a signed inspection log maintained for a period of not less than 3 years. Corrective action taken and annotated for all inspection deficiencies.		
c. Annual training certificates for pri/alt coordinators and substitutes in site binder, and retained for at least three years.		
6. CONTINGENCY EQUIPMENT		
a. Accumulation Area sign prominently posted, with emergency contact and phone number correct.		
b. Clearly labeled spill kit maintained at the site. (Minimum of a broom, dustpan and absorbent material appropriate for waste types at the site).		
c. Charged fire extinguisher readily available.		
d. Contingency plan prominently posted containing area map indicating locations of nearest fire alarm, fire fighting equipment, phone and spill kit.		
e. Telephone, fire alarm or hand-held radio readily available and working to summon emergency help.		
f. Written procedure to notify the Fire Department in place if there is no telephone or fire alarm.		

Checklist Instructions
1. Review each item daily
2. Correct any/all items discovered
3. Sign daily site inspection log
4. Input date/time of inspection
5. Annotate any observations and corrections made

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ACCUMULATION AREA DAILY HAZARDOUS WASTE INSPECTION LOG

BLDG_____SHOP/CODE_____ MONTH/YEAR _____ACCUMMULATION AREA_____

INSPECTOR'S NAME/SIGNATURE*	DATE	TIME	OBSERVATIONS MADE/CORRECTIVE ACTION AND DATE
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
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31			

NOTE: (2) THIS REPORT MUST BE KEPT ON FILE AT THE SITE FOR THREE YEARS FROM DATE COMPLETED SOPA(ADMIN) NLONINST 5090.2C CONTINUE COMMENTS ON BACK AS NEEDED

***By signing this form, the individual denotes that the Accumulation Area HW Checklist was used to complete the inspection.**

V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

J. COMMON INSPECTION FINDINGS

- Expired or incorrect Profile number used or material misidentified.
- Current profile list not in site binder.
- Labels missing or incorrect.
- Waste description does not match description on profile list.
- Coordinator assignment letters or training certificates not in binder.
- Training overdue.
- Inspections not done or records missing; inspection sheet signed by personnel with no current HW Coordinator training certificate in binder.
- Spillage, open containers, containers in poor condition.
- Secondary containment inadequate or in poor condition.

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MAXIMUM PENALTIES FOR VIOLATING ENVIRONMENTAL REGULATION

	CIVIL CHARGES	CRIMINAL CHARGES	
LAW TITLE	NONCOMPLIANCE	WILLFUL VIOLATION	WITHHELD OR FALSIFIED INFORMATION
CLEAN AIR ACT	$27,500/DAY INJUCTION	$27,500/DAY 1 YR PRISON	$10,000/DAY 6 MO PRISON
CLEAN WATER ACT	INJUNCTION	$50,000/DAY 3 YR PRISON	$10,000/DAY 2 YR PRISON
SAFE DRINKING WATER ACT	$5,000/DAY COMPLIANCE ORDER	NA	NA
MARINE PROTECTION, RESEARCH, & SANCTUARIES ACT	$50,000/DAY	$50,000/DAY 1 YR PRISON	NA
RIVERS & HARBORS ACT	INJUNCTION	$2,500/DAY 1 YR PRISON	NA
RESOURCE CONSERVATION & RECOVERY ACT (RCRA)	$37,500/DAY INJUNCTION	$75,000/DAY 2 YR PRISON	$37,500/DAY 1 YR PRISON
FEDERAL INSECTICIDE, FUNGICIDE & RODENTICIDE ACT (FIFRA)	$1,000	$1,000 1 MO PRISON	NA
TOXIC SUBSTANCES CONTROL ACT (TSCA)	$27,500/DAY INJUNCTION	$27,500/DAY 1 YR PRISON	NA
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, & LIABILITY ACT (CERCLA = SUPERFUND)	N/A	$10,000/DAY 1 YR PRISON	$20,000 1 YR PRISON
NOISE CONTROL ACT	$10,000/DAY	$27,500/DAY	1 YR PRISON

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

C. CONTAINER MANAGEMENT - Containers are available from Environmental

1. CONTAINER REQUIREMENTS

- **Compatible with waste. Liquids in closed-top containers. Solids in open top containers.**
- **In good condition - no dents, no holes, no bulges, no leaks, and no spillage.**
- **Containers >26 gallons must be DOT approved.**
- **Must be closed when not in use, (closed unless ADDING or REMOVING waste).**
- **Closed means bungs tightened or lid ring in place and screw tightened so that**
- **no material will leak if container is tipped over.**
- **Must be stored so that all labels are visible for inspection.**
- **Liquids – leave at least 4" of headspace for expansion**
- **All containers – 55 gallon drums must be less than 862 lbs. Blast grit containers can only be 1/3 filled**
- **Use the right size container – 1 to 55 gallons available.**
- **If using trash bags they MUST be clear or opaque.**

Additional requirements for accumulation sites:

No waste can remain in the site more than 60 days.

Additional requirements for satellite sites:

No more than 55 gal. of HW (per stream) in site (1 qt of acutely HW).
No more than 1 container per waste stream of HW.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

2. WASTE SEGREGATION

1. **Hazardous Waste must be stored separately from Hazardous Material.**
2. **EXPIRED MATERIAL (with no option of shelf life extension) is WASTE. Treat accordingly.**
3. **Store incompatible wastes separated by a dike, berm, wall or other device.**
4. **Environmental Department reviews each waste stream to determine an appropriate segregation code. This code is listed for each profile on the List of Authorized Waste Stream Profiles.**
5. **Check the Compatibility of Segregation Codes chart below to determine which waste streams can be safely stored together. Wastes with the same Segregation Code can be stored together. Wastes with different Segregation Codes may be stored together if a "YES" is listed on the chart.**

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SEGREGATION CODES CHART

	Acid (A)	Alk (B)	Ign (F)	PCB (P)	Oxid (O)	React (R)	Toxic (T)	CT Reg (C)	Unknown
Acid (A)	---	NO	NO	NO	NO	NO	NO	NO	NO
Alkalines (B)	NO	---	YES	NO	NO	NO	NO	YES	NO
Ignitables (F)	NO	YES	---	NO	NO	NO	YES	YES	NO
PCBs (P)	NO	NO	NO	---	NO	NO	YES	YES	NO
Oxidizer (O)	NO	NO	NO	NO	---	NO	NO	NO	NO
Reactive (R)	NO	NO	NO	NO	NO	---	NO	NO	NO
Toxic (T)	NO	NO	YES	YES	NO	NO	---	YES	NO
Connecticut Regulated (C)	NO	YES	YES	YES	NO	NO	YES	---	NO
Unknown Wastes	NO	NO	NO	NO	NO	NO	NO	NO	---

NO = Cannot be Stored Together YES = May be Stored Together

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

3. SECONDARY CONTAINMENT

Store liquid containers in secondary containment equal to 10% of the total volume or equal to the largest container, whichever is larger. Examples:

One 5-gallon container, total volume 5 gallons:
- **Largest container = 5 gallons**
- **10% of total volume = 0.5 gallons**
- **Requires 5-gallon secondary containment.**

Four 55-gallon containers, total volume = 220 gallons.
- **Largest container = 55 gallons.**
- **10% of total volume = 22 gallons.**
- **Requires 55-gallon secondary containment.**

Note: Volume of secondary containment should account for space occupied by containers

Position containers so that no container overhangs the edge of the containment.
Keep secondary containment clean and free from spillage, rags, debris, rainwater, or other debris.
The secondary containment must be free of cracks and other damage.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

4. EMPTY CONTAINER RULES

Empty containers of acutely hazardous waste of any size must be managed and disposed of as HW.

HWC will make every reasonable effort to ensure that all wastes have been removed using the practices commonly employed to remove materials from containers (i.e. pouring, pumping, aspirating, or scraping). Under no circumstances will containers with any free flowing liquids, residue of more than 3% x weight on the bottom, or 3% of the total volume of the container be accepted as empty.

Aerosol cans are never considered empty until punctured at the TSDF.

All empty containers NOT staged for future use must be turned in to TSDF.

Empty containers staged for future use must be marked "EMPTY".

Empty containers 55 gallons or more must be turned in with DD 1348 and a state regulated label (blue) with previous contents listed.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

D. WASTE PROFILING:

***NEW WASTE* = used material, material mixed with debris or other materials not listed on site or base wide list.**

***PROFILED WASTE* = used material, material mixed with debris or other materials listed on site or base wide list.**

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

EXPIRED MATERIAL:

1. **Turn in all material that is still usable to CHRIMP directly.**
2. **Contact CHRIMP for expired shelf life material extension via email. Attach a copy of the email to the item and keep in HM locker pending CHRIMP response.**
3. **If refused by CHRIMP, complete a Form B2 and EMAIL to Environmental. List each expired material by *SDS* (*Formerly called an MSDS*) serial number. If CHRIMP label is not affixed to container, the manufacturer's *SDS* must be submitted with the Form B2. MSDS must be specific to the manufacturer of the item.**
4. **It is illegal to store expired material in your HM locker. Complete and EMAIL Form B2 and arrange pickup from Environmental as soon as the material is refused by CHRIMP.**
5. **Attach completed B2 form to waste while waiting for Environmental instructions. (We recommend you keep this B2 form for future use.)**

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FORM B2: TURN-IN SHEET FOR: ⟹ UNUSABLE OR EXPIRED MATERIAL ONLY

COMPLETE: COLUMNS 1-5 ON TABLE BELOW.
LIST: EACH ITEM BY MSDS SERIAL NUMBER AS LISTED ON CHRIMP BAR CODE OR
NO BAR CODE?: LIST MATERIAL BY HMIS MSDS SERIAL NUMBER OR
NOT IN HMIS?: ATTACH MANUFACTURER'S MSDS.
USABLE?: RETURN MATERIAL TO CHRIMP. IF REFUSED BY CHRIMP,CALL SUBASE ENVIRONMENTAL AT X (4673) FOR PICKUP. GIVE COMPLETED FORM TO DRIVER WITH COMPLETED 1348 AND MATERIAL(S).
IF REFUSED BY CHRIMP. NAME OF CHRIMP REP REFUSING. _____
DATE OF REFUSAL. _____
NOT USABLE?: EMAIL FORM TO SUBASE ENVIRONMENTAL AT david.w.carter2@navy.mil OR brian.hendrickson@navy.mil
MAKE SURE THAT THE MSDS EXACTLY MATCHES THE MATERIAL LISTED.

NAME:		HW SITE:		
COMMAND:		PH#:		DATE:
BLDG/SHOP#:		FAX#:		SERIAL #

GENERATOR COMPLETES COLUMNS 1-6:					ENVIRONMENTAL USE ONLY		
1. MSDS SERIAL #	2. STOCK #	3. DISCRIPTION	4.SOL, LIQ, AERO	5. MANUFACTURER	6.WASTE LABEL	7. WASTE CODES	8. SEG. CODE

FORM B2 REV 14 7-30-2014

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FORM B2: TURN-IN SHEET FOR: ⟹ UNUSABLE OR EXPIRED MATERIAL ONLY

COMPLETE: COLUMNS 1-5 ON TABLE BELOW.
LIST: EACH ITEM BY MSDS SERIAL NUMBER AS LISTED ON CHRIMP BAR CODE OR
NO BAR CODE?: LIST MATERIAL BY HMIS MSDS SERIAL NUMBER OR
NOT IN HMIS?: ATTACH MANUFACTURER'S MSDS.
USABLE?: RETURN MATERIAL TO CHRIMP. IF REFUSED BY CHRIMP,CALL SUBASE ENVIRONMENTAL AT X (4673) FOR PICKUP. GIVE COMPLETED FORM TO DRIVER WITH COMPLETED 1348 AND MATERIAL(S).
IF REFUSED BY CHRIMP. NAME OF CHRIMP REP REFUSING. THE MAN
DATE OF REFUSAL. 10/28/2015
NOT USABLE?: EMAIL FORM TO SUBASE ENVIRONMENTAL AT david.w.carter2@navy.mil OR brian.hendrickson@navy.mil

MAKE SURE THAT THE MSDS EXACTLY MATCHES THE MATERIAL LISTED.

NAME:	SEAMAN TIMMY	HW SITE:	S-43 A-17		
COMMAND:	NSSF	PH#:	5988	DATE:	10/28/2015
BLDG/SHOP#:	B-985 R-9	FAX#:	8599	SERIAL #	ST0001

GENERATOR COMPLETES COLUMNS 1-6:					ENVIRONMENTAL USE ONLY		
1. MSDS SERIAL #	2. STOCK #	3. DISCRIPTION	4. SOL, LIQ, AERO	5. MANUFACTURER	6.WASTE LABEL	7. WASTE CODES	8. SEG. CODE
HCLQYY	9150-00-528-8877	DETERGENT GENERAL PURPOSE	LIQ	SMITHS			
HDDMNQ	8040-01-878-5336	SUPER 99 SPRAY ADHESIVE	AERO	7M			

FORM B2 REV 14 7-30-2014

FORM B2: TURN-IN SHEET FOR: ⟹ UNUSABLE OR EXPIRED MATERIAL ONLY

COMPLETE: COLUMNS 1-5 ON TABLE BELOW.
LIST: EACH ITEM BY MSDS SERIAL NUMBER AS LISTED ON CHRIMP BAR CODE OR
NO BAR CODE?: LIST MATERIAL BY HMIS MSDS SERIAL NUMBER OR
NOT IN HMIS?: ATTACH MANUFACTURER'S MSDS.
USABLE?: RETURN MATERIAL TO CHRIMP. IF REFUSED BY CHRIMP,CALL SUBASE ENVIRONMENTAL AT X (4673) FOR PICKUP. GIVE COMPLETED FORM TO DRIVER WITH COMPLETED 1348 AND MATERIAL(S).
IF REFUSED BY CHRIMP. NAME OF CHRIMP REP REFUSING. THE MAN
DATE OF REFUSAL. 10/28/2015
NOT USABLE?: EMAIL FORM TO SUBASE ENVIRONMENTAL AT david.w.carter2@navy.mil OR brian.hendrickson@navy.mil

MAKE SURE THAT THE MSDS EXACTLY MATCHES THE MATERIAL LISTED.

NAME:	SEAMAN TIMMY	HW SITE:	S-43 A-17		
COMMAND:	NSSF	PH#:	5988	DATE:	10/28/2015
BLDG/SHOP#:	B-985 R-9	FAX#:	8599	SERIAL #	ST0001

GENERATOR COMPLETES COLUMNS 1-6:					ENVIRONMENTAL USE ONLY		
1. MSDS SERIAL #	2. STOCK #	3. DISCRIPTION	4. SOL, LIQ, AERO	5. MANUFACTURER	6.WASTE LABEL	7. WASTE CODES	8. SEG. CODE
HCLQYY	9150-00-528-8877	CLEANING LIQUID MINTY	LIQ	SMITHS	B	CR04	C
HDDMNQ	8040-01-878-5336	SUPER 99 SPRAY ADHESIVE (AEROSOL/FLAMMABLE/MEK)	AERO	7M	W	D001 D035	F

FORM B2 REV 14 7-30-2014

V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

3. **NEW WASTE NOT ON SITE SPECIFIC *OR* BASE WIDE PROFILE LIST: Submit Form B1 to Environmental prior to waste generation or as soon as first drop is generated.**

    1. **IDENTIFY GENERATOR AND POINT OF GENERATION**

    2. **DESCRIBE HOW THE WASTE WAS GENERATED**

    3. **IDENTIFY ALL MATERIALS THAT ARE INCLUDED IN THE WASTE. each MSDS must be specific to the manufacturer of the item.**
        a. **Submit a copy of your CHRIMP AUL with each material that is part of the waste stream circled**
        or
        b. **List HMIS SDS Serial number for each material**
        or
        c. **Submit manufacturers SDS.**

    4. **Email MSDS and B1 forms to both david.w.carter2@navy.mil & brian.hendrickson@navy.mil.**
    5. **Keep the waste item in your site with a copy of the forms you submitted until you receive the form back from Environmental.**

    5. **Environmental will return form with label type, profile number, segregation code, waste description and waste codes indicated in Part 2. Immediately put required label on the waste container in your site. Waste description on the label must match the waste description on the Form B1.**

    6. **Keep a copy of the completed (Part 1 and Part 2) Form B1 in your site binder for future reference.**

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

4. **PROFILED WASTE - PROFILE IS CURRENT AND LISTED ON YOUR SITE LIST OR BASE WIDE LIST**

    a. **Complete 1348**

5. **PROFILE REVIEW FOR RECURRING WASTE STREAMS:**

    a. **All profiles must be reviewed every year. Check REVIEW DUE column of profile list. REVIEW DUE column will indicate "YES" on the 11th month. You then have 30 days to submit Form B1 for review. AFTER ONE YEAR, UNREVIEWED PROFILES WILL BE DROPPED FROM YOUR PROFILE LIST.**

    b. **Resubmit the Form B1. List the waste profile number on Page 1 of the Form B1 and complete all sections as indicated above. Note the new block if any changes.**

    c. **Email to both: David.W.Carter2@navy.mil & Brian.Hendrickson@navy.mil**

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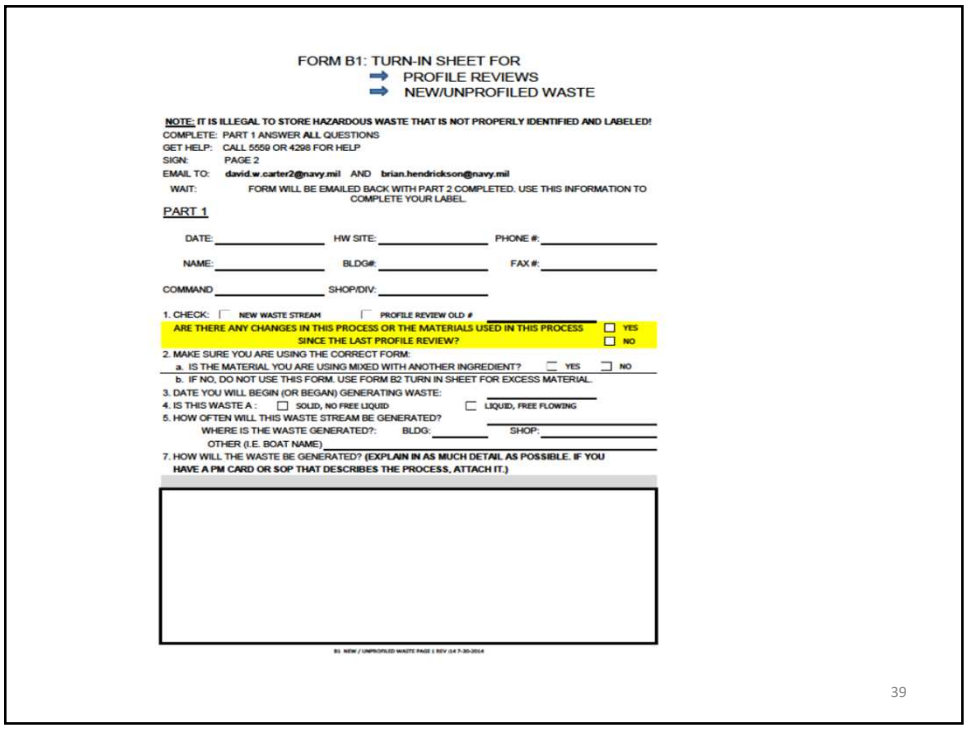

FORM B1: TURN-IN SHEET FOR
➡ PROFILE REVIEWS
➡ NEW/UNPROFILED WASTE

NOTE: IT IS ILLEGAL TO STORE HAZARDOUS WASTE THAT IS NOT PROPERLY IDENTIFIED AND LABELED!
COMPLETE: PART 1 ANSWER **ALL** QUESTIONS
GET HELP: CALL 5559 OR 4298 FOR HELP
SIGN: PAGE 2
EMAIL TO: **david.w.carter2@navy.mil** AND **brian.hendrickson@navy.mil**
WAIT: FORM WILL BE EMAILED BACK WITH PART 2 COMPLETED. USE THIS INFORMATION TO COMPLETE YOUR LABEL.

PART 1

DATE: _____ HW SITE: _____ PHONE #: _____

NAME: _____ BLDG#: _____ FAX #: _____

COMMAND _____ SHOP/DIV: _____

1. CHECK: ☐ NEW WASTE STREAM ☐ PROFILE REVIEW OLD # _____
ARE THERE ANY CHANGES IN THIS PROCESS OR THE MATERIALS USED IN THIS PROCESS SINCE THE LAST PROFILE REVIEW? ☐ YES ☐ NO
2. MAKE SURE YOU ARE USING THE CORRECT FORM:
a. IS THE MATERIAL YOU ARE USING MIXED WITH ANOTHER INGREDIENT? ☐ YES ☐ NO
b. IF NO, DO NOT USE THIS FORM. USE FORM B2 TURN IN SHEET FOR EXCESS MATERIAL.
3. DATE YOU WILL BEGIN (OR BEGAN) GENERATING WASTE: _____
4. IS THIS WASTE A : ☐ SOLID, NO FREE LIQUID ☐ LIQUID, FREE FLOWING
5. HOW OFTEN WILL THIS WASTE STREAM BE GENERATED? _____
WHERE IS THE WASTE GENERATED?: BLDG: _____ SHOP: _____
OTHER (I.E. BOAT NAME) _____
7. HOW WILL THE WASTE BE GENERATED? **(EXPLAIN IN AS MUCH DETAIL AS POSSIBLE. IF YOU HAVE A PM CARD OR SOP THAT DESCRIBES THE PROCESS, ATTACH IT.)**

B1 NEW / UNPROFILED WASTE PAGE 1 REV 04 7-30-2014

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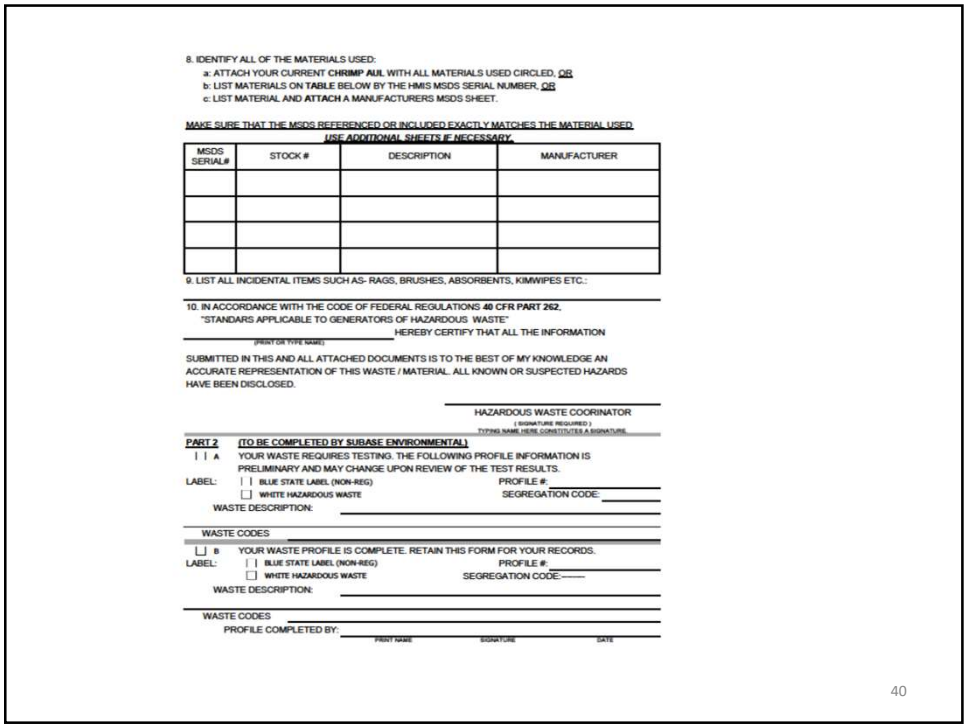

8. IDENTIFY ALL OF THE MATERIALS USED:
a: ATTACH YOUR CURRENT **CHRIMP AUL** WITH ALL MATERIALS USED CIRCLED, OR
b: LIST MATERIALS ON **TABLE** BELOW BY THE HMIS MSDS SERIAL NUMBER, OR
c: LIST MATERIAL AND **ATTACH** A MANUFACTURERS MSDS SHEET.

MAKE SURE THAT THE MSDS REFERENCED OR INCLUDED EXACTLY MATCHES THE MATERIAL USED
USE ADDITIONAL SHEETS IF NECESSARY.

MSDS SERIAL#	STOCK #	DESCRIPTION	MANUFACTURER

9. LIST ALL INCIDENTAL ITEMS SUCH AS- RAGS, BRUSHES, ABSORBENTS, KIMWIPES ETC.:

10. IN ACCORDANCE WITH THE CODE OF FEDERAL REGULATIONS **40 CFR PART 262**, "STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE"
_____ HEREBY CERTIFY THAT ALL THE INFORMATION
(PRINT OR TYPE NAME)
SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THIS WASTE / MATERIAL. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

HAZARDOUS WASTE COORINATOR
(SIGNATURE REQUIRED)
TYPING NAME HERE CONSTITUTES A SIGNATURE

PART 2 **(TO BE COMPLETED BY SUBASE ENVIRONMENTAL)**
❙ ❙ A YOUR WASTE REQUIRES TESTING. THE FOLLOWING PROFILE INFORMATION IS PRELIMINARY AND MAY CHANGE UPON REVIEW OF THE TEST RESULTS.
LABEL: ❙ ❙ BLUE STATE LABEL (NON-REG) PROFILE #: _____
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE: _____
WASTE DESCRIPTION: _____
WASTE CODES _____
☐ B YOUR WASTE PROFILE IS COMPLETE. RETAIN THIS FORM FOR YOUR RECORDS.
LABEL: ❙ ❙ BLUE STATE LABEL (NON-REG) PROFILE #: _____
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE:------
WASTE DESCRIPTION: _____
WASTE CODES _____
PROFILE COMPLETED BY: _____
PRINT NAME SIGNATURE DATE

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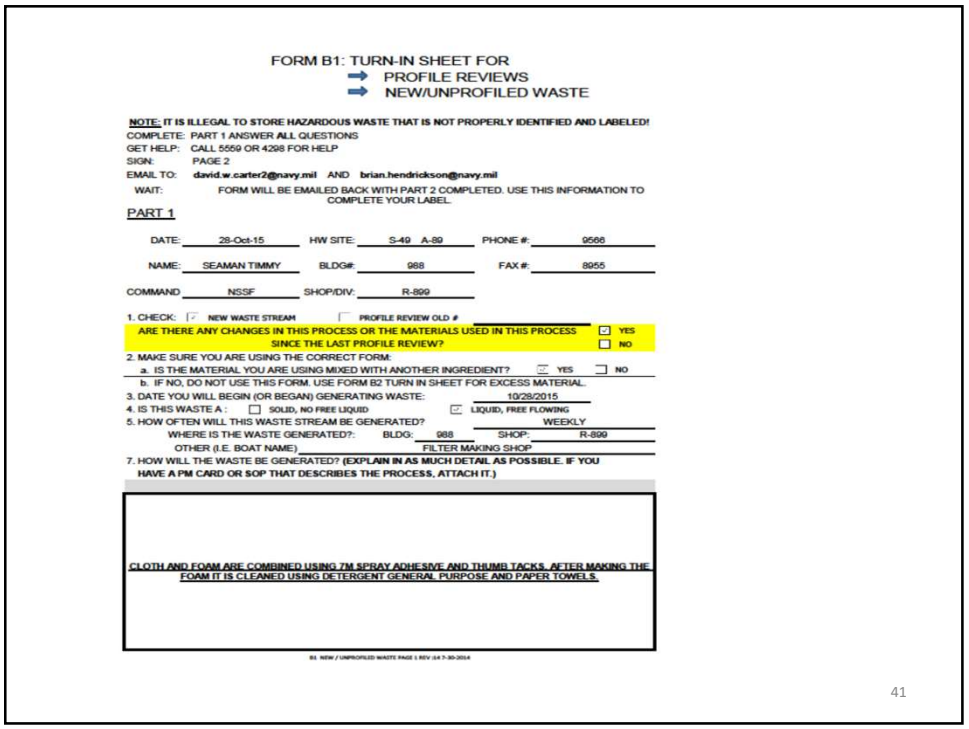

FORM B1: TURN-IN SHEET FOR
➡ PROFILE REVIEWS
➡ NEW/UNPROFILED WASTE

NOTE: IT IS ILLEGAL TO STORE HAZARDOUS WASTE THAT IS NOT PROPERLY IDENTIFIED AND LABELED!
COMPLETE: PART 1 ANSWER **ALL** QUESTIONS
GET HELP: CALL 5559 OR 4298 FOR HELP
SIGN: PAGE 2
EMAIL TO: **david.w.carter2@navy.mil** AND **brian.hendrickson@navy.mil**
WAIT: FORM WILL BE EMAILED BACK WITH PART 2 COMPLETED. USE THIS INFORMATION TO COMPLETE YOUR LABEL.

PART 1

DATE: 28-Oct-15 HW SITE: S-49 A-89 PHONE #: 9566

NAME: SEAMAN TIMMY BLDG#: 988 FAX #: 8955

COMMAND NSSF SHOP/DIV: R-899

1. CHECK: ☑ NEW WASTE STREAM ☐ PROFILE REVIEW OLD #
ARE THERE ANY CHANGES IN THIS PROCESS OR THE MATERIALS USED IN THIS PROCESS SINCE THE LAST PROFILE REVIEW? ☑ YES ☐ NO
2. MAKE SURE YOU ARE USING THE CORRECT FORM:
a. IS THE MATERIAL YOU ARE USING MIXED WITH ANOTHER INGREDIENT? ☐ YES ☐ NO
b. IF NO, DO NOT USE THIS FORM. USE FORM B2 TURN IN SHEET FOR EXCESS MATERIAL.
3. DATE YOU WILL BEGIN (OR BEGAN) GENERATING WASTE: 10/28/2015
4. IS THIS WASTE A : ☐ SOLID, NO FREE LIQUID ☑ LIQUID, FREE FLOWING
5. HOW OFTEN WILL THIS WASTE STREAM BE GENERATED? WEEKLY
WHERE IS THE WASTE GENERATED?: BLDG: 988 SHOP: R-899
OTHER (I.E. BOAT NAME) FILTER MAKING SHOP
7. HOW WILL THE WASTE BE GENERATED? **(EXPLAIN IN AS MUCH DETAIL AS POSSIBLE. IF YOU HAVE A PM CARD OR SOP THAT DESCRIBES THE PROCESS, ATTACH IT.)**

CLOTH AND FOAM ARE COMBINED USING 7M SPRAY ADHESIVE AND THUMB TACKS. AFTER MAKING THE FOAM IT IS CLEANED USING DETERGENT GENERAL PURPOSE AND PAPER TOWELS.

B1 NEW / UNPROFILED WASTE PAGE 1 REV 14 7-30-2014

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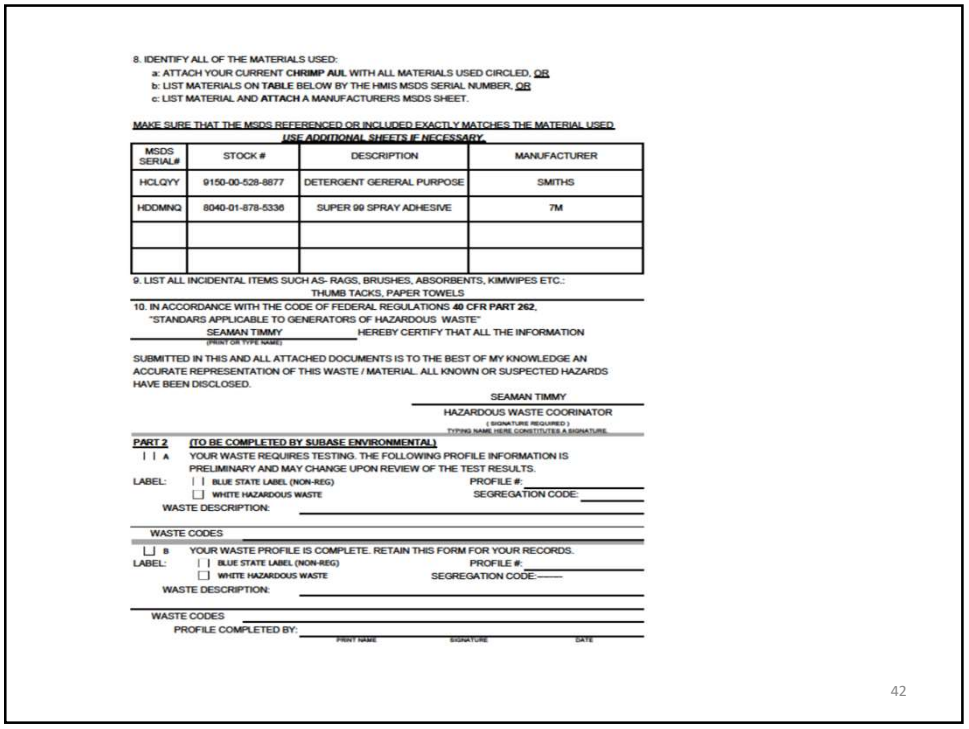


8. IDENTIFY ALL OF THE MATERIALS USED:
a: ATTACH YOUR CURRENT **CHRIMP AUL** WITH ALL MATERIALS USED CIRCLED, OR
b: LIST MATERIALS ON **TABLE** BELOW BY THE HMIS MSDS SERIAL NUMBER, OR
c: LIST MATERIAL AND **ATTACH** A MANUFACTURERS MSDS SHEET.

MAKE SURE THAT THE MSDS REFERENCED OR INCLUDED EXACTLY MATCHES THE MATERIAL USED.
USE ADDITIONAL SHEETS IF NECESSARY.

MSDS SERIAL#	STOCK #	DESCRIPTION	MANUFACTURER
HCLQYY	9150-00-528-8877	DETERGENT GERERAL PURPOSE	SMITHS
HDDMNQ	8040-01-878-5336	SUPER 99 SPRAY ADHESIVE	7M

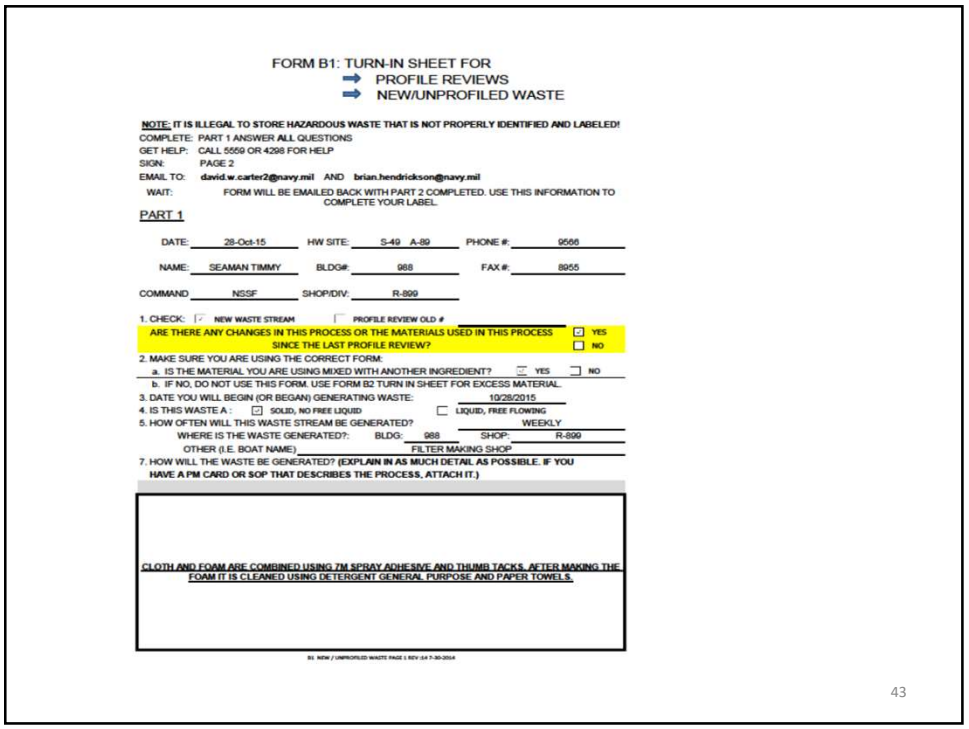
9. LIST ALL INCIDENTAL ITEMS SUCH AS- RAGS, BRUSHES, ABSORBENTS, KIMWIPES ETC.:
THUMB TACKS, PAPER TOWELS
10. IN ACCORDANCE WITH THE CODE OF FEDERAL REGULATIONS **40 CFR PART 262**,
"STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE"
SEAMAN TIMMY (PRINT OR TYPE NAME) HEREBY CERTIFY THAT ALL THE INFORMATION SUBMITTED IN THIS AND ALL ATTACHED DOCUMENTS IS TO THE BEST OF MY KNOWLEDGE AN ACCURATE REPRESENTATION OF THIS WASTE / MATERIAL. ALL KNOWN OR SUSPECTED HAZARDS HAVE BEEN DISCLOSED.

SEAMAN TIMMY
HAZARDOUS WASTE COORINATOR
(SIGNATURE REQUIRED)
TYPING NAME HERE CONSTITUTES A SIGNATURE

PART 2 **(TO BE COMPLETED BY SUBASE ENVIRONMENTAL)**
| | A YOUR WASTE REQUIRES TESTING. THE FOLLOWING PROFILE INFORMATION IS PRELIMINARY AND MAY CHANGE UPON REVIEW OF THE TEST RESULTS.
LABEL: | | BLUE STATE LABEL (NON-REG) PROFILE #:
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE:
WASTE DESCRIPTION:
WASTE CODES

☐ B YOUR WASTE PROFILE IS COMPLETE. RETAIN THIS FORM FOR YOUR RECORDS.
LABEL: | | BLUE STATE LABEL (NON-REG) PROFILE #:
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE:------
WASTE DESCRIPTION:
WASTE CODES
PROFILE COMPLETED BY:
PRINT NAME SIGNATURE DATE

42



FORM B1: TURN-IN SHEET FOR
➡ PROFILE REVIEWS
➡ NEW/UNPROFILED WASTE

NOTE: IT IS ILLEGAL TO STORE HAZARDOUS WASTE THAT IS NOT PROPERLY IDENTIFIED AND LABELED!
COMPLETE: PART 1 ANSWER **ALL** QUESTIONS
GET HELP: CALL 5559 OR 4298 FOR HELP
SIGN: PAGE 2
EMAIL TO: **david.w.carter2@navy.mil** AND **brian.hendrickson@navy.mil**
WAIT: FORM WILL BE EMAILED BACK WITH PART 2 COMPLETED. USE THIS INFORMATION TO COMPLETE YOUR LABEL.

PART 1

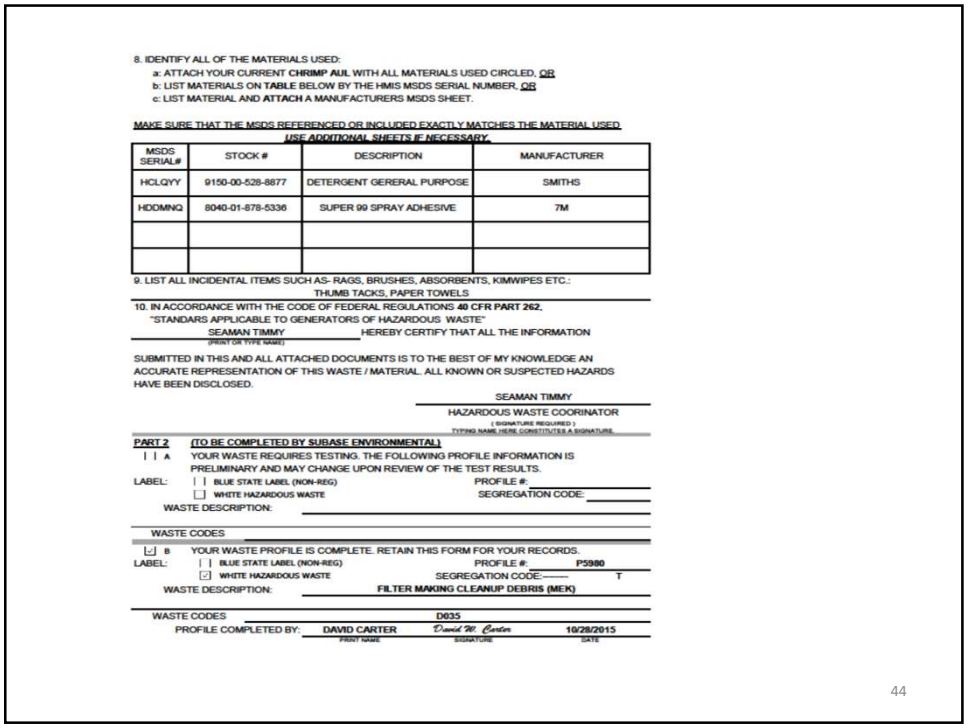
DATE: 28-Oct-15 HW SITE: S-49 A-89 PHONE #: 9566
NAME: SEAMAN TIMMY BLDG#: 988 FAX #: 8955
COMMAND NSSF SHOP/DIV: R-899

1. CHECK: ☑ NEW WASTE STREAM ☐ PROFILE REVIEW OLD #
ARE THERE ANY CHANGES IN THIS PROCESS OR THE MATERIALS USED IN THIS PROCESS SINCE THE LAST PROFILE REVIEW? ☑ YES ☐ NO
2. MAKE SURE YOU ARE USING THE CORRECT FORM:
a. IS THE MATERIAL YOU ARE USING MIXED WITH ANOTHER INGREDIENT? ☐ YES ☐ NO
b. IF NO, DO NOT USE THIS FORM. USE FORM B2 TURN IN SHEET FOR EXCESS MATERIAL.
3. DATE YOU WILL BEGIN (OR BEGAN) GENERATING WASTE: 10/28/2015
4. IS THIS WASTE A : ☑ SOLID, NO FREE LIQUID ☐ LIQUID, FREE FLOWING
5. HOW OFTEN WILL THIS WASTE STREAM BE GENERATED? WEEKLY
WHERE IS THE WASTE GENERATED?: BLDG: 988 SHOP: R-899
OTHER (I.E. BOAT NAME) FILTER MAKING SHOP
7. HOW WILL THE WASTE BE GENERATED? **(EXPLAIN IN AS MUCH DETAIL AS POSSIBLE. IF YOU HAVE A PM CARD OR SOP THAT DESCRIBES THE PROCESS, ATTACH IT.)**

CLOTH AND FOAM ARE COMBINED USING 7M SPRAY ADHESIVE AND THUMB TACKS. AFTER MAKING THE FOAM IT IS CLEANED USING DETERGENT GENERAL PURPOSE AND PAPER TOWELS.

B1 NEW / UNPROFILED WASTE PAGE 1 REV 13A 7-30-2014

43



8. IDENTIFY ALL OF THE MATERIALS USED:
a: ATTACH YOUR CURRENT **CHRIMP AUL** WITH ALL MATERIALS USED CIRCLED, OR
b: LIST MATERIALS ON **TABLE** BELOW BY THE HMIS MSDS SERIAL NUMBER, OR
c: LIST MATERIAL AND **ATTACH** A MANUFACTURERS MSDS SHEET.

MAKE SURE THAT THE MSDS REFERENCED OR INCLUDED EXACTLY MATCHES THE MATERIAL USED.
USE ADDITIONAL SHEETS IF NECESSARY.

MSDS SERIAL#	STOCK #	DESCRIPTION	MANUFACTURER
HCLQYY	9150-00-528-8877	DETERGENT GERERAL PURPOSE	SMITHS
HDDMNQ	8040-01-878-5336	SUPER 99 SPRAY ADHESIVE	7M

9. LIST ALL INCIDENTAL ITEMS SUCH AS- RAGS, BRUSHES, ABSORBENTS, KIMWIPES ETC.:
THUMB TACKS, PAPER TOWELS
10. IN ACCORDANCE WITH THE CODE OF FEDERAL REGULATIONS **40 CFR PART 262,**
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SEAMAN TIMMY
HAZARDOUS WASTE COORINATOR
(SIGNATURE REQUIRED)
TYPING NAME HERE CONSTITUTES A SIGNATURE

PART 2 **(TO BE COMPLETED BY SUBASE ENVIRONMENTAL)**
| | A YOUR WASTE REQUIRES TESTING. THE FOLLOWING PROFILE INFORMATION IS PRELIMINARY AND MAY CHANGE UPON REVIEW OF THE TEST RESULTS.
LABEL: | | BLUE STATE LABEL (NON-REG) PROFILE #:
☐ WHITE HAZARDOUS WASTE SEGREGATION CODE:
WASTE DESCRIPTION:
WASTE CODES

☑ B YOUR WASTE PROFILE IS COMPLETE. RETAIN THIS FORM FOR YOUR RECORDS.
LABEL: | | BLUE STATE LABEL (NON-REG) PROFILE #: P5980
☑ WHITE HAZARDOUS WASTE SEGREGATION CODE:---------- T
WASTE DESCRIPTION: FILTER MAKING CLEANUP DEBRIS (MEK)
WASTE CODES D035
PROFILE COMPLETED BY: DAVID CARTER (PRINT NAME) David W. Carter (SIGNATURE) 10/28/2015 (DATE)

44

V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

E. LABELING REQUIREMENTS - all containers collecting or storing regulated waste must be labeled and the contents/hazards identified as soon as waste generation begins.

1. GENERAL PROCEDURES

- **a. Select proper label - (HAZ or STATE REG or Universal Waste)**
- **b. Complete required information for each waste type or label**
- **c. Write legibly and use permanent marker pen**
- **d. Never put a new label over an old label - remove the old label**

2. SELECT PROPER LABEL - The correct label is determined by the Waste Code:

- **a. CODE = D-, F-, P-, U-,k-: Use White HAZ Label**
- **b. CODE = CR-: Use Blue STATE REG Label**
- **c. CODE = UW Use Universal Waste Label**

a. *New Waste* - label is specified by Environmental on Form B1 or B2.
b. *Waste listed on BW or Site Profile List* – as listed on the Profile list.

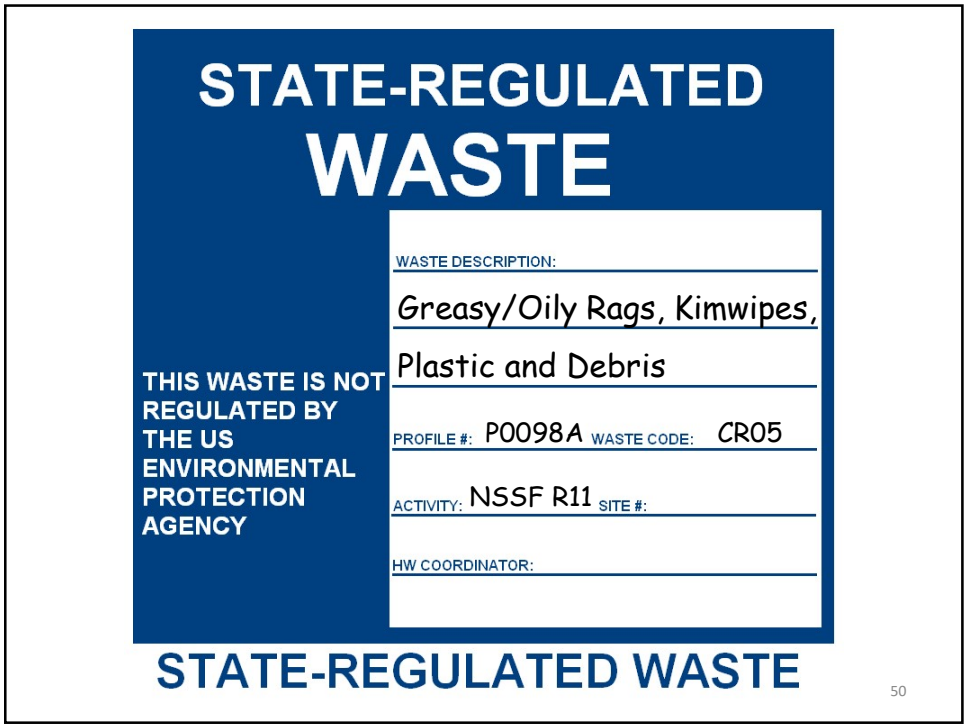
45

46

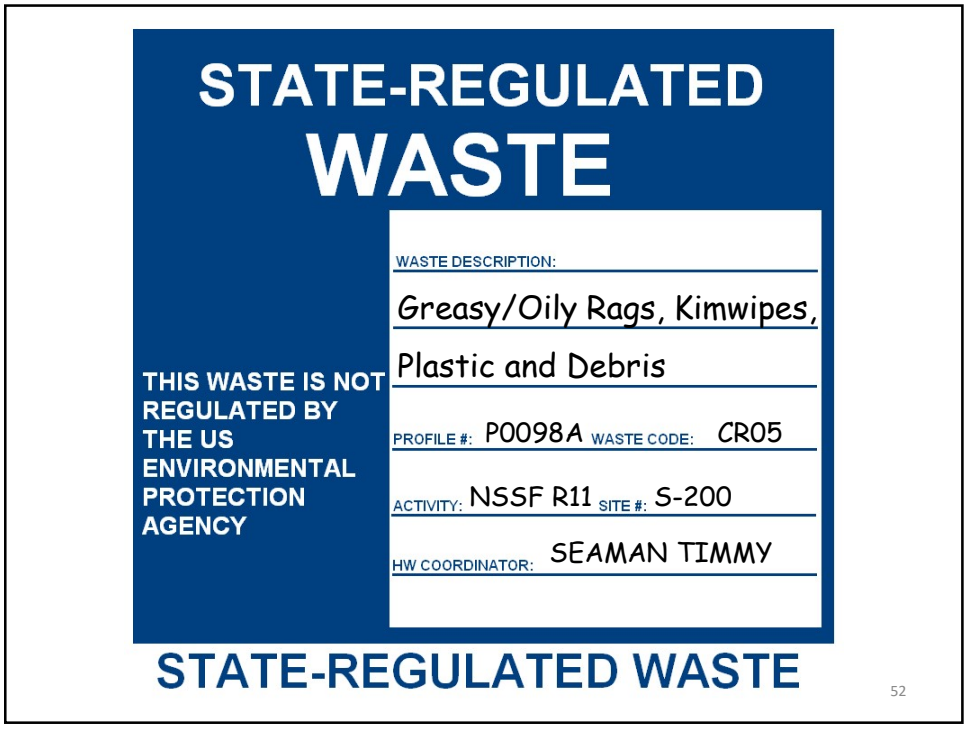

STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #:
WASTE CODE:
ACTIVITY:
SITE #:
HW COORDINATOR:
STATE-REGULATED WASTE
47


STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #: P0098A
WASTE CODE:
ACTIVITY:
SITE #:
HW COORDINATOR:
STATE-REGULATED WASTE
48


STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #: P0098A WASTE CODE: CR05
ACTIVITY:
SITE #:
HW COORDINATOR:
STATE-REGULATED WASTE
49


STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #: P0098A WASTE CODE: CR05
ACTIVITY: NSSF R11 SITE #:
HW COORDINATOR:
STATE-REGULATED WASTE
50


STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #: P0098A WASTE CODE: CR05
ACTIVITY: NSSF R11 SITE #: S-200
HW COORDINATOR:
STATE-REGULATED WASTE
51


STATE-REGULATED
WASTE
THIS WASTE IS NOT REGULATED BY THE US ENVIRONMENTAL PROTECTION AGENCY
WASTE DESCRIPTION:
Greasy/Oily Rags, Kimwipes,
Plastic and Debris
PROFILE #: P0098A WASTE CODE: CR05
ACTIVITY: NSSF R11 SITE #: S-200
HW COORDINATOR: SEAMAN TIMMY
STATE-REGULATED WASTE
52

HAZARDOUS WASTE

NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

WASTE DESCRIPTION:	
ACTIVITY:	SITE #:
HW COORDINATOR:	TELEPHONE #:
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

53

HAZARDOUS WASTE

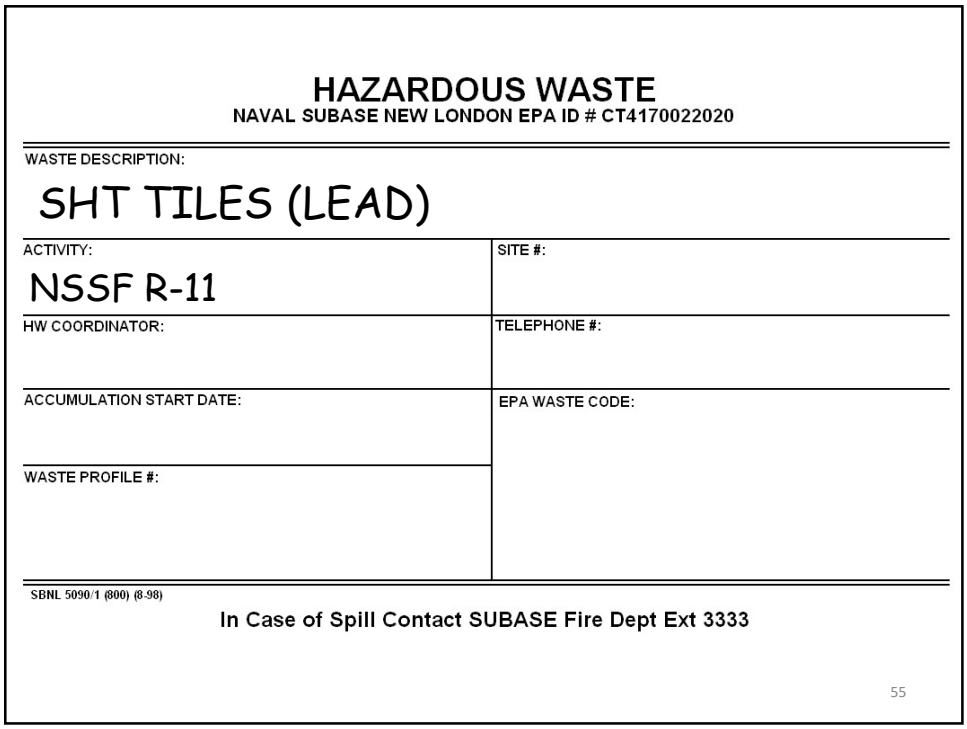
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

WASTE DESCRIPTION: SHT TILES (LEAD)	
ACTIVITY:	SITE #:
HW COORDINATOR:	TELEPHONE #:
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

54



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

WASTE DESCRIPTION:

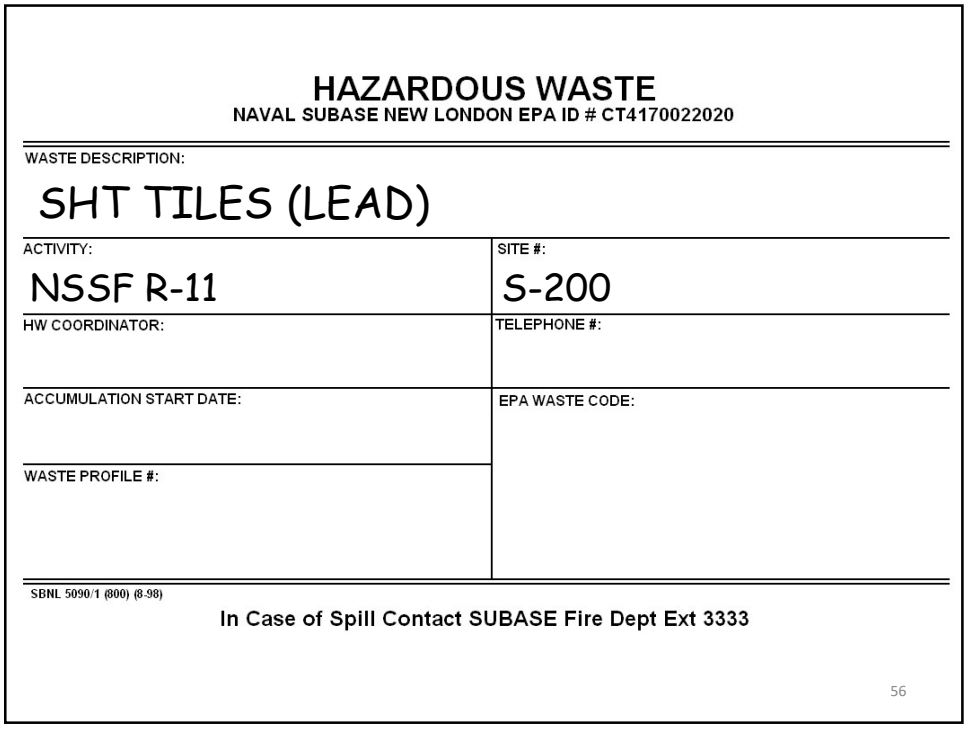
SHT TILES (LEAD)

ACTIVITY:	SITE #:
NSSF R-11	
HW COORDINATOR:	TELEPHONE #:
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

55



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

WASTE DESCRIPTION:

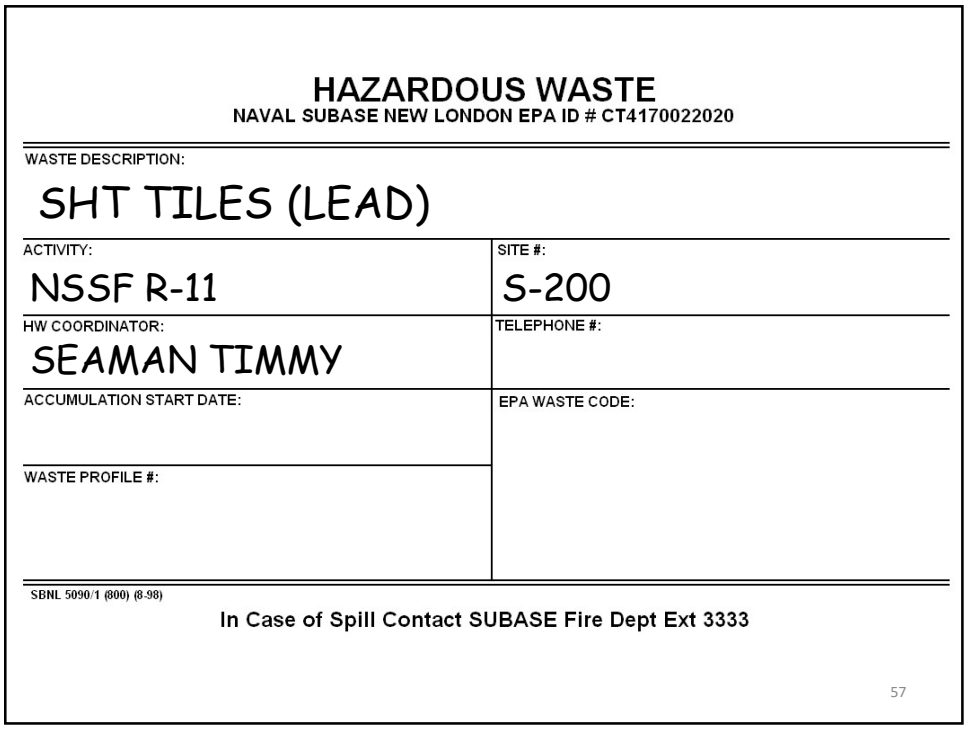
SHT TILES (LEAD)

ACTIVITY:	SITE #:
NSSF R-11	S-200
HW COORDINATOR:	TELEPHONE #:
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

56



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

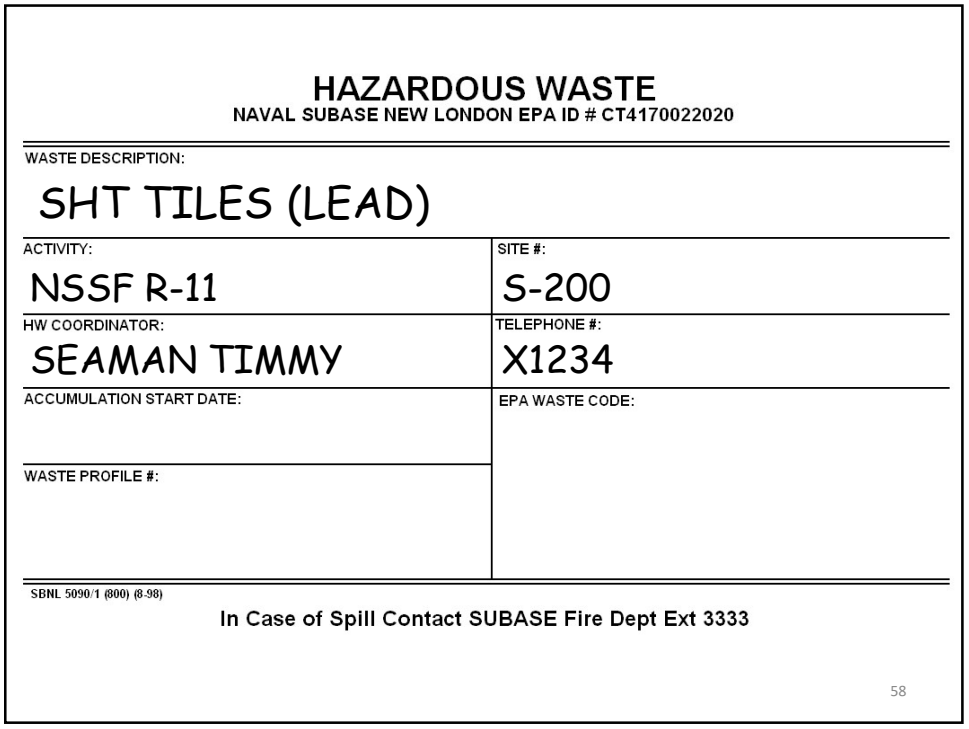
WASTE DESCRIPTION:
SHT TILES (LEAD)

ACTIVITY:	SITE #:
NSSF R-11	S-200
HW COORDINATOR:	TELEPHONE #:
SEAMAN TIMMY	
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

57



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

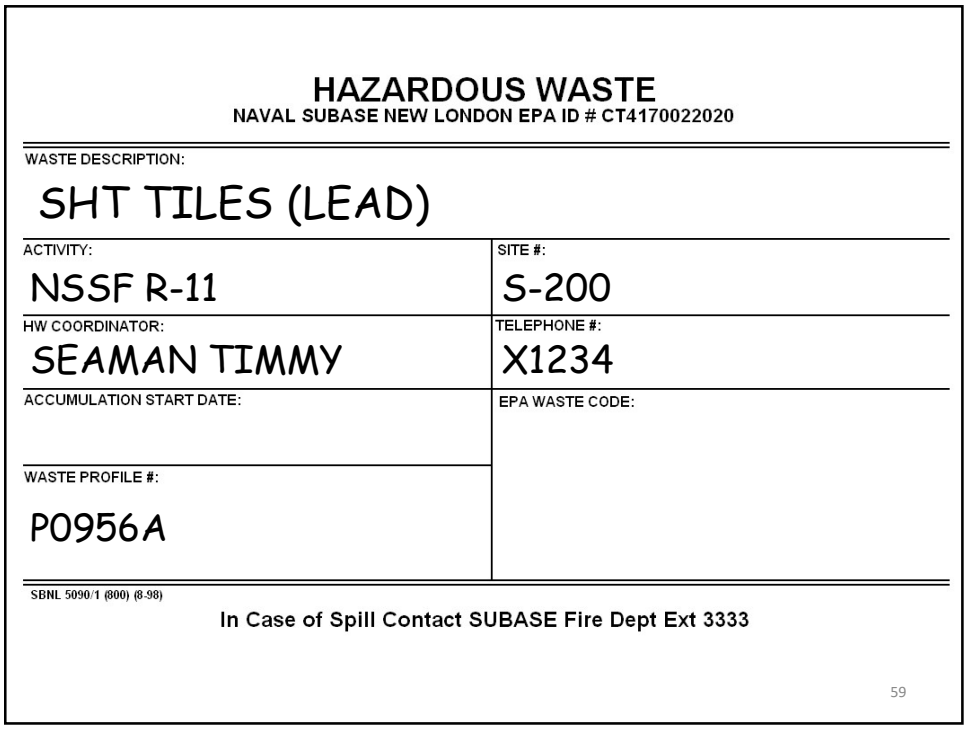
WASTE DESCRIPTION:
SHT TILES (LEAD)

ACTIVITY:	SITE #:
NSSF R-11	S-200
HW COORDINATOR:	TELEPHONE #:
SEAMAN TIMMY	X1234
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

58



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

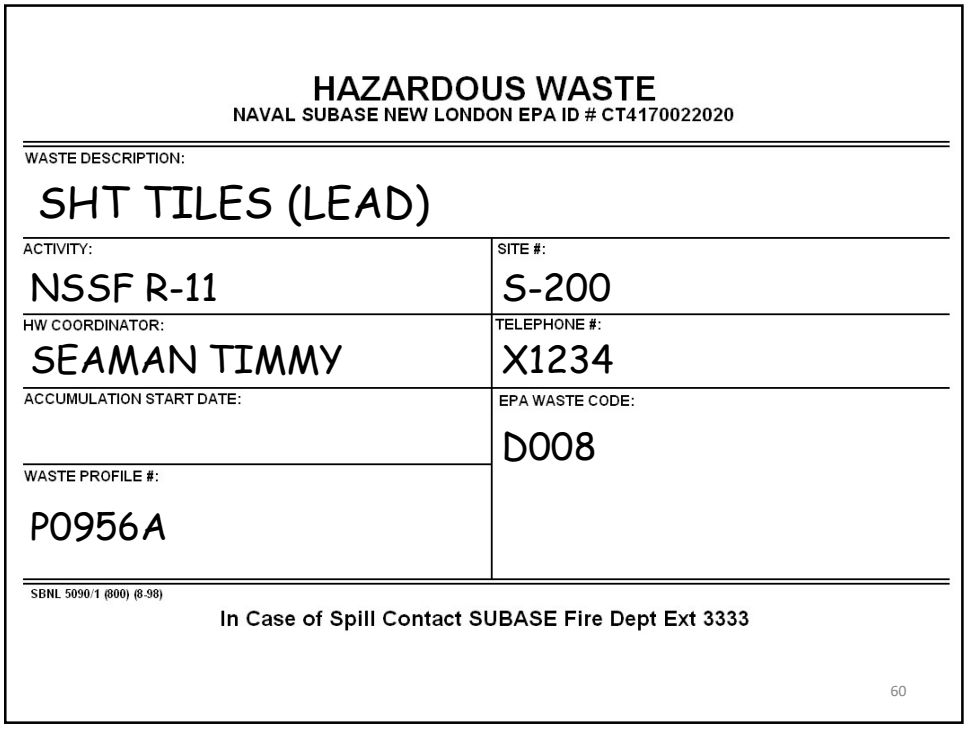
WASTE DESCRIPTION:
SHT TILES (LEAD)

ACTIVITY:	SITE #:
NSSF R-11	S-200
HW COORDINATOR:	TELEPHONE #:
SEAMAN TIMMY	X1234
ACCUMULATION START DATE:	EPA WASTE CODE:
WASTE PROFILE #:	
P0956A	

SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

59



HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020

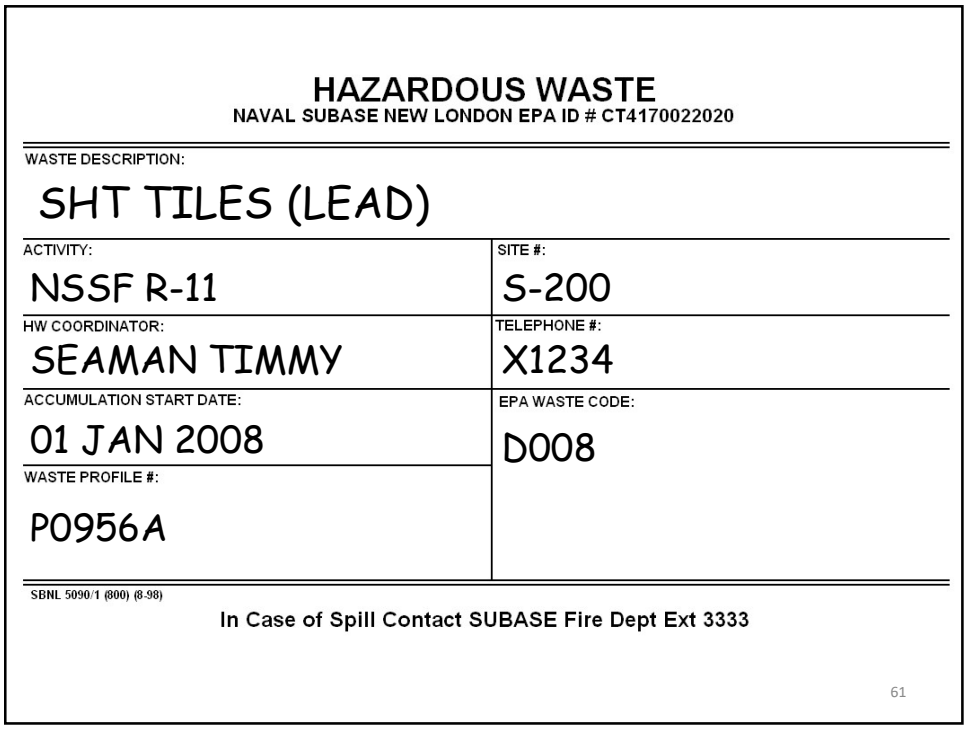
WASTE DESCRIPTION:
SHT TILES (LEAD)

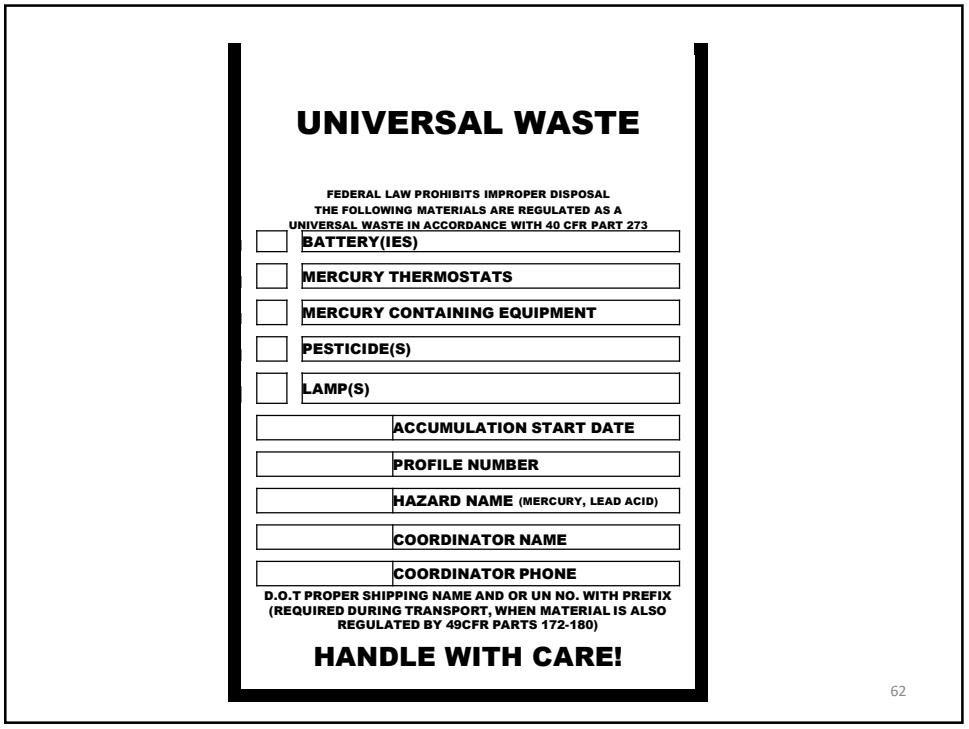
ACTIVITY:	SITE #:
NSSF R-11	S-200
HW COORDINATOR:	TELEPHONE #:
SEAMAN TIMMY	X1234
ACCUMULATION START DATE:	EPA WASTE CODE:
	D008
WASTE PROFILE #:	
P0956A	

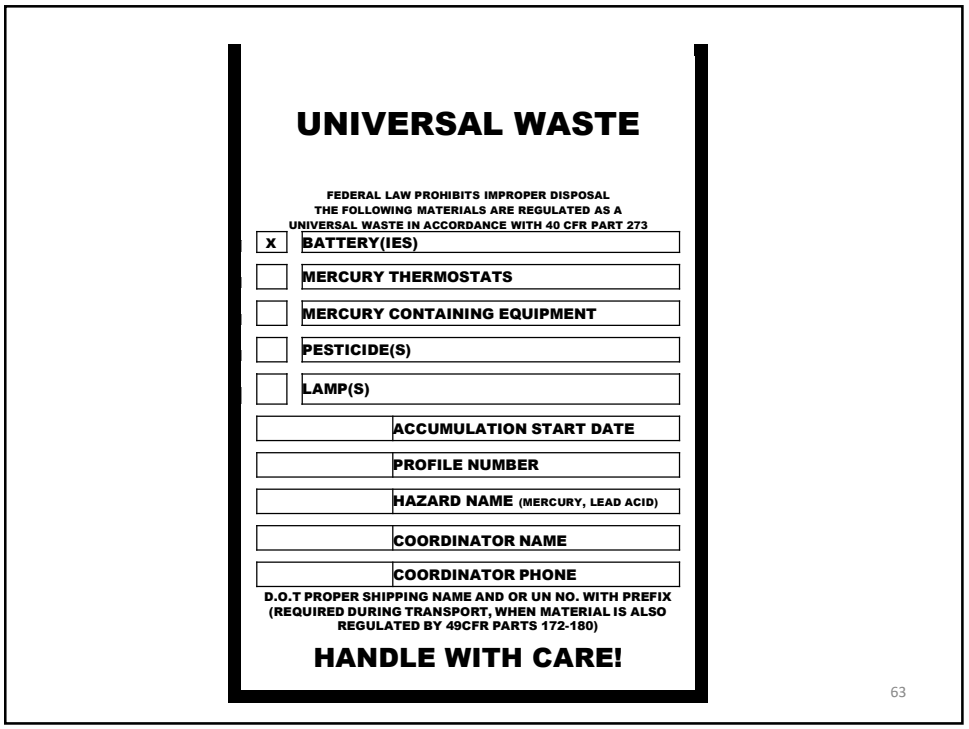
SBNL 5090/1 (800) (8-98)

In Case of Spill Contact SUBASE Fire Dept Ext 3333

60


HAZARDOUS WASTE
NAVAL SUBASE NEW LONDON EPA ID # CT4170022020
WASTE DESCRIPTION:
SHT TILES (LEAD)
ACTIVITY:
NSSF R-11
SITE #:
S-200
HW COORDINATOR:
SEAMAN TIMMY
TELEPHONE #:
X1234
ACCUMULATION START DATE:
01 JAN 2008
EPA WASTE CODE:
D008
WASTE PROFILE #:
P0956A
SBNL 5090/1 (800) (8-98)
In Case of Spill Contact SUBASE Fire Dept Ext 3333
61


UNIVERSAL WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273
BATTERY(IES)
MERCURY THERMOSTATS
MERCURY CONTAINING EQUIPMENT
PESTICIDE(S)
LAMP(S)
ACCUMULATION START DATE
PROFILE NUMBER
HAZARD NAME (MERCURY, LEAD ACID)
COORDINATOR NAME
COORDINATOR PHONE
D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)
HANDLE WITH CARE!
62



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

	ACCUMULATION START DATE
	PROFILE NUMBER
	HAZARD NAME (MERCURY, LEAD ACID)
	COORDINATOR NAME
	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
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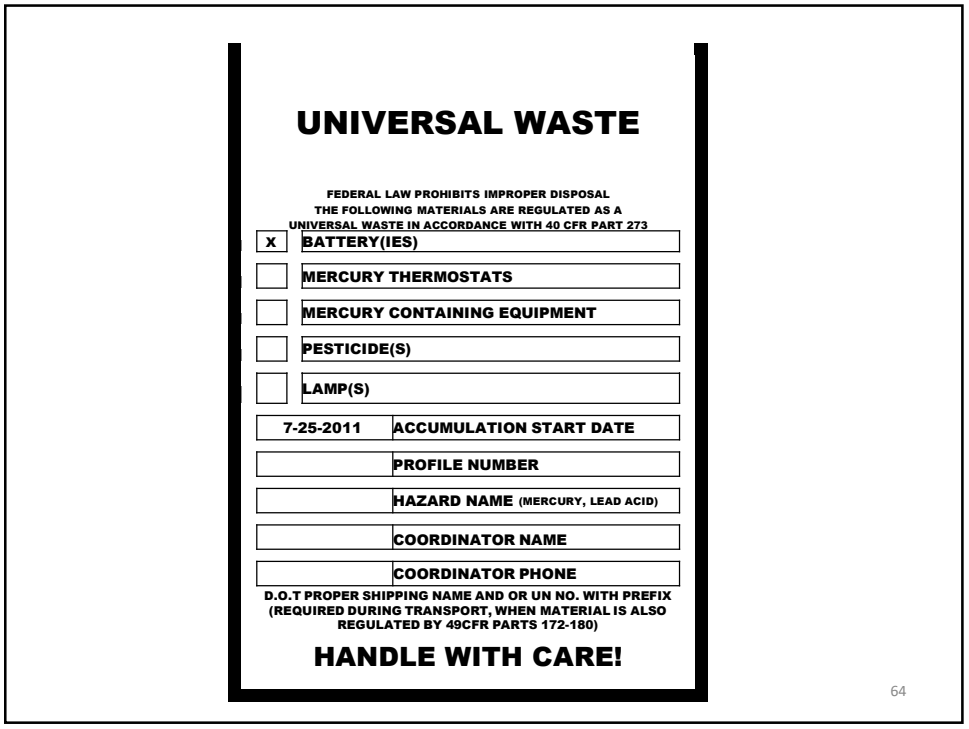
HANDLE WITH CARE!

63



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

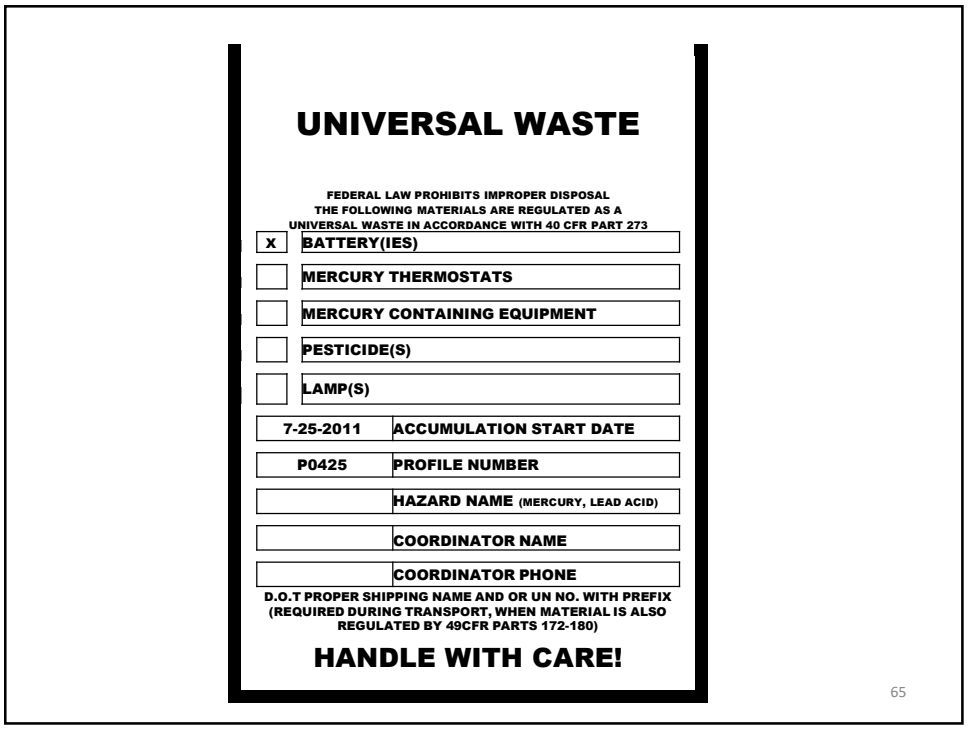
X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

7-25-2011	ACCUMULATION START DATE
	PROFILE NUMBER
	HAZARD NAME (MERCURY, LEAD ACID)
	COORDINATOR NAME
	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)

HANDLE WITH CARE!

64



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

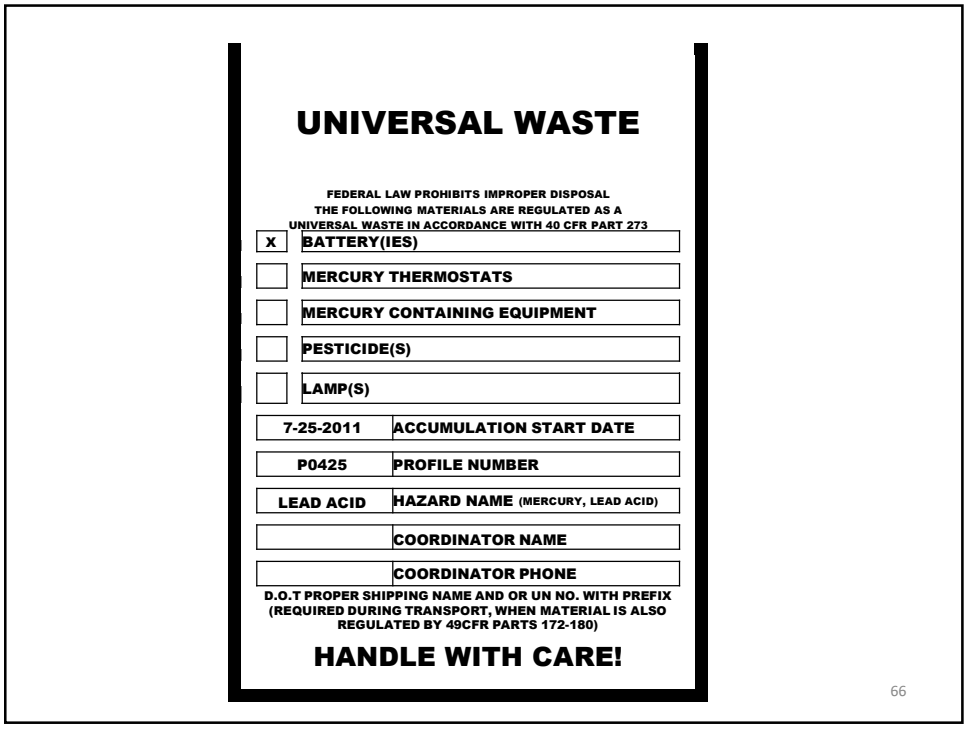
X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

7-25-2011	ACCUMULATION START DATE
P0425	PROFILE NUMBER
	HAZARD NAME (MERCURY, LEAD ACID)
	COORDINATOR NAME
	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)

HANDLE WITH CARE!

65



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

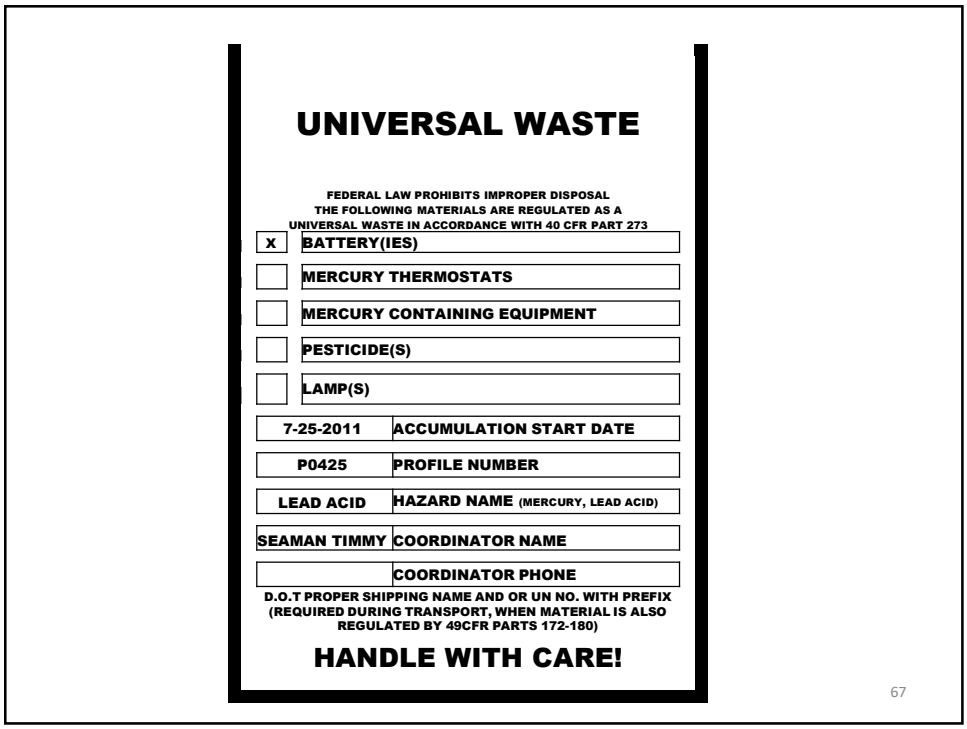
X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

7-25-2011	ACCUMULATION START DATE
P0425	PROFILE NUMBER
LEAD ACID	HAZARD NAME (MERCURY, LEAD ACID)
	COORDINATOR NAME
	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)

HANDLE WITH CARE!

66



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

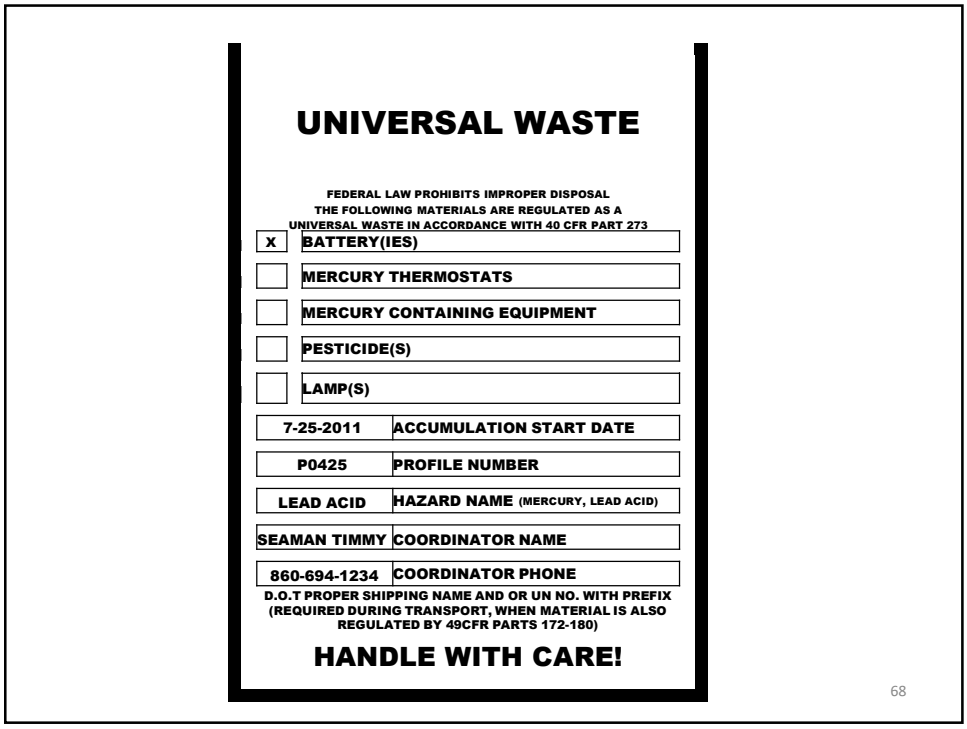
X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

7-25-2011	ACCUMULATION START DATE
P0425	PROFILE NUMBER
LEAD ACID	HAZARD NAME (MERCURY, LEAD ACID)
SEAMAN TIMMY	COORDINATOR NAME
	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)

HANDLE WITH CARE!

67



UNIVERSAL WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
THE FOLLOWING MATERIALS ARE REGULATED AS A
UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273

X	BATTERY(IES)
	MERCURY THERMOSTATS
	MERCURY CONTAINING EQUIPMENT
	PESTICIDE(S)
	LAMP(S)

7-25-2011	ACCUMULATION START DATE
P0425	PROFILE NUMBER
LEAD ACID	HAZARD NAME (MERCURY, LEAD ACID)
SEAMAN TIMMY	COORDINATOR NAME
860-694-1234	COORDINATOR PHONE

D.O.T PROPER SHIPPING NAME AND OR UN NO. WITH PREFIX
(REQUIRED DURING TRANSPORT, WHEN MATERIAL IS ALSO
REGULATED BY 49CFR PARTS 172-180)

HANDLE WITH CARE!

68

V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

F. HW TURN-IN PROCEDURES

1. WASTE TURN-IN REQUIREMENTS: When do I call for a Pick-Up?

Satellite Site:

Only one container of each Hazardous Waste per (profile/stream) is allowed. Remove full containers of HW before starting new container of same waste.

Site volume reaches 55 gallons of Hazardous Waste per (profile/stream) (or 1 quart of acutely HW), pickup is required within 72 hours.

Universal Waste must be picked up when Accumulation Start Date reaches 6 months.

Accumulation Site:

Profiled waste - arrange pickup within 60 days of Accumulation Start Date.

Universal Waste must be picked up when Accumulation Start Date reaches 6 months.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

2. TURN-IN DOCUMENTATION: What do I need to turn in waste?

PROFILED WASTE:	**Completed DD Form 1348-1**
NEW WASTE STREAM:	**Completed B-1 form** **Completed DD Form 1348-1**
EXPIRED MATERIAL REFUSED BY CHRIMP:	**Completed Form B2** **Completed DD Form 1348-1**

3. TURN-IN SCHEDULING

Call Environmental HW Site, X4673 to schedule pickup. Have DD-1348 ready before you call. SUBASE Environmental will schedule the pickup service. Scheduled pickups are Monday and Thursday after the pier run (0900).

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

G. RECORD KEEPING

1. SITE BINDER - must include the following:

- **Inspection Forms w/ corrective actions indicated**
- **Current List of Authorized Waste Stream Profiles (<6 months old; call x4673 for new List)**
- **Copies of all completed Forms B1.**
- **Training Certificates: Primary & Alternate**
- **Assignment Letters: Primary & Alternate**
- **Site Authorization Letter**

2. RECORDS ARCHIVING

- **Maintain all records for 3 years at the site including all training records for former coordinators.**
- **Turn in records >3 years old to Environmental for archiving.**

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

H. TRAINING AND ASSIGNMENT

1. HW Coordinator training required prior to assignment as site primary/alternate.

2. Assignment letter must be submitted to the Env. Dept. for each primary and alternate coordinator prior to assignment.

3. HW Coordinator Training is required annually. IT IS YOUR RESPONSIBILITY TO MAKE SURE YOU SCHEDULE TRAINING PRIOR TO YOUR ANNIVERSARY DATE. NO SPECIAL CLASSES WILL BE HELD!

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

DD 1348-1A GENERATION SHORT

FORM FOR HWC USE

Print DD 1348-1A

Field	Value	Guidance
HWC Name:	Seaman Timmy	
HWC Tel. Number:	4567	
HWC UIC:	N00129	

Clear HWC Information

Field	Value	Guidance
DOCUMENT NUMBER:	N001290059ST01	Format: [UIC-Julian Date-Four Digit Code] Ex: N00129-4042-0001.
NSN (No Dashes):	8010-001234567	NSN from CHRIMP Barcode is available.
Waste Description:	PAINT BLACK SUBMARINE (NON-REG	EXACTLY as it appears on profile sheet!
Number of Containers:	2	Number of Containers.
Type of Containers:	5 PAIL	Type and Size of Containers. Ex. Plastic Gallon
Accumulation Start Date:	3-2-10	Accum. Site: Day First Drop is Collected / Sat. Site: Day Container is Full.
Profile Number:	CKQSS	P Number for Waste / CHRIMP Barcode Number for Product.
Waste Codes:	CR04	D, F, U, or C Codes.
Site Number:	A22	Site Number as Issued by Subase Environmental.

Clear Input Information

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

DD 1348-1

2 N A H

1. TOTAL PRICE — UNIT PRICE — DOLLARS/CTS
2. SHIP FROM: N00129
3. SHIP TO: DRMO
4. MARK FOR
5. DOC DATE: 3/2/2010
17. NOMENCLATURE: PAINT BLACK SUBMARINE (NON-REG)
18. TY CONT: 5 PAIL
19. NO CONT: 2

24 DOCUMENT NUMBER & SUFFIX (30-44)

N001290059ST01

N001290059ST01

25. NATIONAL STOCK NO & ADD (8-22)

8010-001234567

8010-001234567

PAINT BLACK SUBMARINE (NON-REG)

NOMENCLATURE

27. ADDITIONAL DATA

Accumulation Start Date: 3-2-10
Profile Number: CKQSS
Waste Codes: CR04
Site Number: A-22

POINT OF CONTACT
SEAMAN TIMMY
TELEPHONE NUMBER
4567

DD FORM 1348-1A, JUL 91 (EG) ISSUE RELEASE/RECEIPT DOCUMENT — PREVIOUS EDITION MAY BE USED — PerForm (DLA)

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

I. INCIDENT CONTROL (FIRE/EXPLOSION/SPILL)

HWC must be familiar with the location and use of all emergency equipment and communication and alarm systems.

***Minor spill or leak of HW or HM*: cease all operations, contain and cleanup the spill in accordance with the site specific spill contingency plan. Containerize, label and manage all cleanup materials as HW.**

***Spill or leak outside building or reaching, or in danger of reaching, a floor drain, sewer or storm drain, water body* (i.e. the Thames River): call the Fire Dept. at x3333 regardless of the magnitude of the spill or leak.**

***Fire, explosion, or spill which threatens to cause imminent danger to life or property*: cease all operations and notify the fire department. If there is no fire alarm at your site, activate the closest fire alarm in order to evacuate all impacted areas.**

Rescue any injured persons, if it is safe to do so. Do not enter any areas that could be considered confined spaces when dealing with any release.

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V. ROLE OF HAZARDOUS WASTE COORDINATOR ACCUMULATION/SATELLITE SITE REQUIREMENTS

I. INCIDENT CONTROL CONTINUED (FIRE/EXPLOSION/SPILL)

The initial notification to the Fire Dept. should include:

- **Person(s) injured and severity of injury.**
- **Location, quantity and type of material discharge. Have MSDS ready if possible.**
- **Source of spill, time occurred/discovered, and the direction discharge is moving.**
- **Name/organization/phone number of person reporting spill.**

Restrict all ignition sources (heaters, boilers, electrical equipment) if a potential exists for the presence of flammable vapors (e.g. gasoline).

Document all spills or leaks in the site log or inspection report.

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VII. SPECIAL PROGRAMS/TURN IN PROCEDURES

A. FLUORESCENT LIGHT BULBS - Base wide profile P0385, **UW**
- **No fluorescent light bulbs are allowed in regular trash (including "Broken" bulbs) per State of Connecticut regulations.**
- Pack in original box or other secure wrapping. No tape on bulbs.
- No paper work required. Turn in to B562 Monday – Friday 1300-1500. Do not leave boxes of bulbs unattended at B562 if no one is there.
- If you can't turn in on day of generation, label and store in your HW site.
- If bulb is broken, clean up and place in a closed pail, BASE WIDE, P1812.

B. BATTERIES – Collect for up to six months in a universal waste labeled and dated poly bucket. All batteries must have contacts taped. Use appropriate base wide profile number. Turn in to B562 with 1348 Monday – Friday 1300 – 1500.

C. RED RAG PROGRAM - Base wide profile P0541A, CR05
All shops should be using the red rags when possible.
Limited to oils and greases. No paints, solvents or adhesives. No gasoline or other flammable liquids.
Turn-in dirty red rags at B-562 with completed DD Form 1348. Indicate the number of rags turned in on the 1348.
Clean rags are available at B-562.

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VII. SPECIAL PROGRAMS/TURN IN PROCEDURES

D.COMPRESSED GAS CYLINDERS -
Contact provider (BOC, ABCO, Etc.) if cylinder bears property label. Compressed Gas Providers are REQUIRED to collect their property, or…
If cylinder is US GOVT Property, route thought MTIS Building 33, x3601.
If cylinder can not be disposed of using the above two options, contact Environmental x4298 or CHRIMP x4698 for instructions.

E. AEROSOL CANS – Follow rules for expired material turn-in. Form B2 and DD1348 required.

F. OIL FILTERS FOR RECYCLING -
Use base wide profile P1257, "Used Oil - Filters For Recycling (Hydraulic Oil/Lube Oil/ Motor Oil/Diesel)", CR02, for all used motor oil, lubricating oil, hydraulic oils and diesel filters.
Use blue STATE REG label.
Secondary containment required for storage of containers.
Profile P1257 does not include filters from refrigerant compressor oil or gasoline filters.

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VII. SPECIAL PROGRAMS/TURN IN PROCEDURES

G. USED OIL FOR RECYCLING –

- **No used oil mixed with hazardous waste. NO GASOLINE, NO ANTIFREEZE, NO WATER!**
- Use base wide profile P1258, "Used Oil For Recycling CR02
- (Hydraulic Oil/Lube Oil/Motor Oil)"
- CR02 for all used motor oil, lubricating oil and hydraulic oil .
- Use a properly completed blue, STATE REG label.
- Secondary containment required for storage of containers.
- Site specific profiles for MWR and for refrigerant compressor oil will remain in place.
- P1258 does not include refrigerant compressor oil**.**

H. SCRAP METAL – Includes solder, zinc anodes, lead, circuit boards, etc. Store scrap metal marked with the words - Scrap Metal for Recycling". Turn in to DRMO w/DD-Form 1348 when container is full. Scrap metal does not need to be stored in HW site so long as it is intended for recycling and is properly marked. Any scrap metal stored outside must be covered.

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WHAT'S NEW?

- BROKEN FLUORESCENT LIGHT BULBS, are no longer permitted to be placed in the trash, They "MUST" be managed as a hazardous waste. (Base Wide Profile list, P1812, White hazardous waste label, D009(mercury)).
- LATEX PAINT

  DRY brushes, rollers, trays and other related debris is to placed into the GREEN dumpsters. LATEX cans that have solidified go into the GREEN dumpsters. LATEX cans that are NOT USABLE and still liquid must be solidified before being placed into the GREEN dumpsters. You as the HWC must solidify the LATEX cans that still have liquid in them. The method for solidifying the paint is to add a adsorbent material such as (Speedy-dry, kitty litter) to the can and allowing it to solidify.
- The HWCs will be held accountable after a US EPA, NCIS investigation if the trash contractor or receiving facility find or are found with improperly managed LATEX products.

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WHAT'S NEW

- If paint is not dry, or you are not sure, call us at (x5559, x4298) for guidance
- PRINT CARTRIDGES
- THE DOLPHIN EXPRESS ACCEPTS ALL TYPES
- OF PRINTER CARTRIDGES FOR RECYCLING.
- ALL CONTAINERS MUST BE CLOSED UNLESS ADDING OR REMOVING WASTE.

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WHAT'S NEW

In addition to a broom, dustpan, and sorbent spill kits must also contain a plastic bag.

Use 6 Mil, clear poly bags for waste, if bags are used.

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Regulatory Inspections by EPA or CTDEEP

DO:

- Answer questions briefly.
- Answer questions honestly.
- Only answer questions that are asked.

DO NOT:

- Speak unless spoken to.
- Offer any information not specifically requested.
- Hide any information.
- Hide any waste.
- Falsify any records.

If you do not know the answer, defer to TSDF personnel.

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VIII. ROLE OF ENVIRONMENTAL DEPARTMENT

PROGRAM	NAME	EMAIL	PHONE	FAX
ENVIRONMENTAL DIRECTOR:	Michael Brown	michael.brown13@navy.mil	X3976	X1374
HAZARDOUS WASTE DIVISION				
HAZARDOUS WASTE PROGRAM MANAGER	Brian Hendrickson	brian.hendrickson@navy.mil	X4298	N/A
Technical assistance; new waste stream profiles; profile reviews; assign waste codes				
Technical assistance; profile reviews(B-1); assign waste codes (B-2); training class registration and certificates	Lead EPS: David Carter	david.w.carter2@navy.mil	x5559	N/A
Containers, labels, other supplies; pick up HW from sites; arrange for sampling and disposal; site inspections	EPS	jon.forrer@navy.mil	x5559	N/A
	EPS	cory.cavanaugh@navy.mil	X5559	N/A
Waste manifests; conducts training class; site and coordinator listings; Basewide and site profile lists, site inspections	Eugenie Kelly	eugenie.kelly@navy.mil	x4673	N/A

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VIII. ROLE OF ENVIRONMENTAL DEPARTMENT

OTHER PROGRAMS				
Underground storage tanks, SPCC, Storm water	Chris Koproski	Christopher.koproski@navy.mil	X5191	X1374
Asbestos, ODS, Pesticides, Drinking water	Rich Massad	richard.massad@navy.mil	X5140	X1374
Air programs	James Norris	james.norris@navy.mil	X5192	X1374
Wastewater	Leo Kokoszka	leopold.kokoszka@navy.mil	X5164	X1374
NEPA, Historic preservation	Tracey McKenzie	tracey.p.mckenzie@navy.mil	X5649	X1374

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THANK YOU FOR ATTENDING

FOR ANY QUESTIONS AND COMMENTS PLEASE SEE THE INSTRUCTOR OR CALL SUBASE ENVIRONMENTAL DEPT

This training slideshow is available upon request!

ALSO INCLUDED IN TRAINING FILE ARE REQUIRED FORMS AND TRAINING GUIDES FOR HW DISPOSAL SITES

PHONE 4673/ 5559 / 4298

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ATTACHMENT D

CONTINGENCY PLAN

(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)
NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)

ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

Appendix M-1
Hazardous Waste Contingency Plan

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Naval Facilities Engineering Command Mid-Atlantic
Norfolk, Virginia

Hazardous Waste Contingency Plan

Naval Submarine Base New London, Groton, Connecticut

EPA Identification Number CT4170022020

February 2019

HAZARDOUS WASTE CONTINGENCY PLAN

NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT
EPA ID NO. CT4170022020
PERMIT NO.: DEP/HWM-095-005

Prepared for:
Department of the Navy
Naval Facilities Engineering Command Mid-Atlantic
9742 Maryland Avenue
Norfolk, Virginia 23511-1433

Prepared by:
Tetra Tech, Inc.
5700 Lake Wright Drive, Suite 102
Norfolk, Virginia 23502

Under Contract With:
KOMAN Government Solutions, LLC
180 Gordon Drive, Suite 110
Exton, Pennsylvania 19341

CONTRACT NUMBER N40085-17-D-8324
TASK ORDER N4008518F5594

FEBRUARY 2019

PREPARED UNDER THE DIRECTION OF:

JAMES R. FORRELLI, P.E.
PROJECT MANAGER
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SALEM, NEW HAMPSHIRE

APPROVED FOR SUBMISSION BY:

LOUISE SLATE
PROGRAM MANAGER
TETRA TECH, INC.
NORFOLK, VIRGINIA

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DOCUMENT TITLE: Hazardous Waste Contingency Plan Naval Submarine Base New London, Groton, Connecticut				
PREPARED BY: Tetra Tech 5700 Lake Wright Drive, Suite 102 Norfolk, Virginia 23502			**APPROVED BY:**	
REV. NO.	**EFFECTIVE DATE**	**DESCRIPTION OF REVISION**	**APPROVAL**	
			SIGNATURE	**DATE**
A		Original Issue		

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Definitions

Accumulation start date: The date on which a hazardous waste container becomes full in an accumulation area or satellite site, or the date when hazardous waste is first placed in a 90-day hazardous waste storage area.

Acutely hazardous waste: Waste that has an immediate and substantial adverse health effect. These wastes are designated P001 through P205, F020 through F023, F026, and F027.

Generator: Any person or organization that produces hazardous waste. Naval Submarine Base New London (SUBASENLON) is a generator of hazardous waste.

Generating activity: A department/tenant activity and/or contractor that generates hazardous waste.

Hazardous material: Any material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or to the environment.

Hazardous substance: A material or waste designated as hazardous under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act.

Hazardous waste: Any solid, liquid, semisolid, or contained gaseous material designated as waste for disposal and exhibiting any of the four hazardous wastes characteristics as defined in 40 Code of Federal Regulations (CFR) Part 261, Subpart C or listed in Subpart D, or that is a mixture of a listed waste and solid waste.

Hazardous waste storage area: A 90-day or less temporary storage area operated by hazardous waste personnel at SUBASENLON.

Solid waste: According to Resource Conservation and Recovery Act (RCRA) regulations, a material must be defined as a solid waste before it can be considered a hazardous waste. The regulatory definition of solid waste, found at 40 CFR 261.2(a), encompasses the following discarded materials: (1) materials that are abandoned (disposed of, burned, or incinerated); (2) materials that are recycled; (3) materials that are inherently waste-like; and (4) waste military munitions.

Universal waste: Hazardous waste that meets the alternative management criteria set forth in 40 CFR Part 273. There are five waste streams that can be managed as universal waste in Connecticut: (1) batteries; (2) mercury-containing thermostats and other mercury-containing equipment; (3) certain pesticides; (4) lamps (including but not limited to fluorescent, neon, and mercury vapor lamps); and (5) used electronics.

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Acronyms and Abbreviations

BCT	Base Consolidated Telecommunications
CDO	Command Duty Officer
CFR	Code of Federal Regulations
CNRMA	Commander, Navy Region Mid-Atlantic
CO	Commanding Officer
CT DEEP	Connecticut Department of Energy and Environmental Protection
DoD	United States Department of Defense
DOE	United States Department of Energy
DoN	United States Department of the Navy
EMO	Emergency Management Officer
EOC	Emergency Operations Center
EPA	United States Environmental Protection Agency
FIC	Facility Incident Commander
FRP	Facility Response Plan
HAZMAT	Hazardous Material
HWCP	Hazardous Waste Contingency Plan
HWMF	Hazardous Waste Management Facility
ICP	Integrated Contingency Plan
NAVFAC	Naval Facilities Engineering Command
OPNAVINST	Chief of Naval Operations Instruction
OSRO	Oil service recovery organization
PWD	Public Works Department
RCRA	Resource Conservation and Recovery Act

SPCC	Spill Prevention, Control, and Countermeasures
SUBASENLON	Naval Submarine Base New London
SUBASENLONINST	Naval Submarine Base New London Instruction
TBD	To be determined
XO	Executive Officer

1.0 Introduction and Scope

In accordance with 40 Code of Federal Regulations (CFR) Section 264, Subpart D, and 40 CFR 270.14(b)(7), this Hazardous Waste Contingency Plan (HWCP) presents procedures and equipment maintained by Naval Submarine Base New London (SUBASENLON) to respond to hazardous situations related to the accumulation of hazardous wastes at Building 562, the Hazardous Waste Management Facility (HWMF). The HWMF is the central location for storing hazardous and State-regulated wastes generated by SUBASENLON operations. The HWMF includes nine greater-than-90-day storage bays where wastes are segregated and stored.

The purpose of this HWCP is to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at SUBASENLON. The provisions of this plan must be carried out immediately whenever such an event occurs. Such incidents are referred to as “emergencies” in this HWCP.

This HWCP is designed for hazardous waste management operations conducted at the HWMF, including transportation within SUBASENLON. The HWCP will be invoked for spills, explosions, and fires associated with hazardous waste management activities at the HWMF and during transportation of wastes to and from the HWMF.

Table 1-1 lists the required contents of the HWCP along with the associated regulatory citation and where the required information is located in this HWCP.

Table 1-1
Required Contents of the HWCP

Requirement	CFR Citation	Location in HWCP
List of emergency coordinators	40 CFR 264.52(d); 264.55	Section 3.0
Describe actions to be taken in response to an emergency; report findings	40 CFR 264.52(a); 264.56(d)	Section 5.0, Section 5.1.2
Emergency coordinator must activate internal alarms and notify appropriate State or local agencies	40 CFR 264.56(a)	Section 5.1.1, Section 5.1.2
Identification of hazardous materials	40 CFR 264.56(b)	Section 5.1.1
Assessment of possible hazards; report findings	40 CFR 264.56(c), (d)	Section 5.1.1, Section 5.1.2
Prevention of recurrence or spread of fires, explosions, or releases	40 CFR 264.56(e)	Section 5.3

Requirement	CFR Citation	Location in HWCP
Monitor for leaks, pressure buildup, gas generation, or equipment ruptures if facility stops operation	40 CFR 264.56(f)	Section 5.3
Storage, treatment, and disposal of released material	40 CFR 264.56(g)	Section 5.4
Ensure that incompatible wastes are not stored together	40 CFR 264.56(h)(1)	Section 5.4
Post-emergency equipment management	40 CFR 264.56(h)(2)	Section 5.4
Operating record and written report	40 CFR 264.56(i)	Section 9.0
Container spills and leakage	40 CFR 264.171	Section 2.1.2
Prevent flow or addition of wastes to a tank system	40 CFR 264.196(a)	Not applicable – No tank system
Removal of waste from a tank system or secondary containment system	40 CFR 264.196(b)	
Containment of visible releases to the environment	40 CFR 264.196(c)	
Notifications and reports	40 CFR 264.196(d)	
Provision of secondary containment, repair, or closure	40 CFR 264.196(e)	
When to remove a surface impoundment from service	40 CFR 264.227	Not applicable – No surface impoundment
Stopping waste addition to the impoundment	40 CFR 264.227(b)(1)	
Containing leaks	40 CFR 264.227(b)(2)	
Stopping leaks	40 CFR 264.227(b)(3)	
Preventing catastrophic failure	40 CFR 264.227(b)(4)	
Emptying the impoundment	40 CFR 264.227(b)(5)	
Certification of structural integrity	40 CFR 264.226(c); 264.227(d)(1)	
Repairs as the result of a sudden drop in liquid level	40 CFR 264.227(d)(2)	
Liner installation	40 CFR 264.227(d)(2)(i)	
Certification of repaired liner system	40 CFR 264.227(d)(2)(ii)	
Procedures to follow in case of containment building leaks	40 CFR 264.1101(c)(3)	Section 2.1.2
Repair of containment building	40 CFR 264.1101(c)(3)	Section 2.1.2
Certification of repair of containment building	40 CFR 264.1101(c)(3)(iii)	Section 2.1.2

Requirement	CFR Citation	Location in HWCP
Drip pad spills and leakage	40 CFR 264.573(m)	Not applicable – No drip pad
Stopping waste addition	40 CFR 264.573(m)(1)(ii)	
Determine appropriate cleanup and repair; establish a schedule for repairs	40 CFR 264.573(m)(1)(iii)	
Notification to the Regional Administrator	40 CFR 264.573(m)(1)(iv)	
Certification of repairs and cleanup	40 CFR 264.573(m)(3)	
List of emergency equipment	40 CFR 264.52(e)	Section 6.0
Describe arrangements with local police departments, fire departments, hospitals, contractors, and State and local emergency response teams	40 CFR 264.37; 264.52(c)	Section 7.1
Evacuation plan	40 CFR 264.52(f)	Section 8.0
Recordkeeping and reporting to Regional Administrator	40 CFR 264.56(i)	Section 9.0
Location and distribution of HWCP	40 CFR 264.53	Section 7.0

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2.0 General Information

SUBASENLON is a United States Navy submarine base located at the intersection of Route 12 and Crystal Lake Road in Groton, Connecticut. The base occupies approximately 600 acres and is bordered to the west by the Thames River, to the north by Long Cove and Long Cove Road, to the east by Route 12, and to the south by Crystal Lake Road. SUBASENLON employs approximately 10,000 military and civilian personnel. The activities performed at this site include the maintenance and repair of nuclear submarines; operation of a medical clinic, research laboratory, and submarine training facility; and maintenance of buildings and dormitories for Navy personnel. As a result of these activities, hazardous wastes and State-regulated wastes are generated and stored temporarily on site. Ultimately, all hazardous wastes and State-regulated wastes that cannot be recycled are removed from the site by certified waste haulers and disposed of at permitted waste disposal facilities.

SUBASENLON is a hazardous waste generator and permitted storage facility. All hazardous waste generated is managed under United States Environmental Protection Agency (EPA) ID number CT4170022020.

A vicinity map of SUBASENLON is provided as Figure 2-1. Hazardous waste is stored at the HWMF, the location of which is shown on Figure 2-2.

2.1 Hazardous Waste Storage and Accumulation

This section describes SUBASENLON hazardous waste storage and accumulation operations and the measures in place to prevent or minimize the effects of a fire, explosion, or hazardous waste spill or release. These operations are conducted at the HWMF located at the intersection of Tautog Avenue and Wahoo Avenue (Figure 2-2).

2.1.1 HWMF Design and Operations

The HWMF accepts, packages for shipment, and stores Resource Conservation and Recovery Act (RCRA)-regulated hazardous waste prior to off-site transport and treatment/disposal. This facility handles hazardous wastes generated from all SUBASENLON operations. The Navy holds a RCRA Part B Permit to store SUBASENLON-generated hazardous waste materials at the HWMF. The 11,652-square-foot HWMF has nine segregated storage rooms designed for container (typically 55-gallon drum) storage of hazardous waste. The designated waste storage areas are summarized in Table 2-1, along with the permitted maximum capacity of each hazardous waste storage room. Figure 2-3 shows the interior layout of the HWMF.

Table 2-1
HWMF Waste Storage Bay Capacities

Waste Storage Area	Bay Number	Maximum Number of 55-Gallon Drums	Maximum Storage Volume (Liquid) Based on Secondary Containment (gallons)	Maximum Storage Volume (Solid and Liquid) (gallons)
Universal	112	20	935	1,100
Alkaline	113	20	935	1,145
Toxic II	114	40	935	2,200
Toxic I	115	80	1,810	4,445
State-Regulated	116	336	10,090	18,660
Ignitable	117	32	1,810	1,865
Oxidizer	118	20	935	1,145
Reactive	119	20	935	1,130
Acid	120	20	935	1,145

2.1.2 Emergency Prevention

Throughout the active life of the HWMF, if the owner or operator detects a condition that could lead to or has caused a release of hazardous waste, the owner or operator must repair the condition promptly, in accordance with the following procedures.

1. Upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier), the owner or operator must:

   A. Enter a record of the discovery in the facility operating record.

   B. Immediately remove the portion of the containment building affected by the condition from service.

   C. Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs.

   D. Within 7 days after the discovery of the condition, notify the Regional Administrator of the condition, and within 14 working days, provide a written notice to the Regional Administrator with a description of the steps taken to repair the containment building, and the schedule for accomplishing the work.

2. The Regional Administrator will review the information submitted, make a determination regarding whether the containment building must be removed from service completely or partially until repairs and cleanup are complete, and notify the owner or operator of the determination and the underlying rationale in writing.

3. Upon completing all repairs and cleanup, the owner or operator must notify the Regional Administrator in writing and provide a verification, signed by a qualified, registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with item D above.

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of 40 CFR 264.

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3.0 Hazardous Waste Emergency Coordinators

A list of all persons qualified to act as Emergency Coordinator is not provided because such a list would change too frequently to be useful. Instead, Emergency Coordinators will be contacted through the SUBASENLON Regional Dispatch Center by telephone at (860) 694-3333.

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4.0 Implementation Criteria

This HWCP must be implemented under the following circumstances:

- Spills or leaks
    - A fire hazard exists due to spilled material.
    - A toxic fume hazard exists.
    - A spill endangers life or health.
    - A spill threatens property.
    - A spill enters a permeable material such as soil.
    - A spill threatens navigable water.
    - Groundwater may be threatened.
- Fires or explosions
    - A fire causes release of toxic fumes.
    - A fire-fighting agent results in contaminated runoff.
    - There is imminent threat of explosion.

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5.0 Emergency Response Procedures

Emergency notification and general response procedures that are specific to fires, explosions, or unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents during transportation to, or storage in, the HWMF are identified in this section.

Established notification and emergency response procedures that are used throughout SUBASENLON for spills are provided in the following documents:

- Naval Submarine Base New London Instruction (SUBASENLONINST) 3440.1E, SUBASENLON's Installation Emergency Management Plan (DoN, 2016).
- SUBASENLON's Facility Response Plan (FRP) (NAVFAC, 2016a).
- SUBASENLON's Spill Prevention, Control, and Countermeasures (SPCC) Plan (NAVFAC, 2015).

These documents address all buildings throughout SUBASENLON. The HWMF is Building 562.

5.1 Notification Procedures

The notification process follows the installation notification process described in the Emergency Management Plan (SUBASENLONINST 3440.1E), Annex 27, Emergency Management Notification and Contact Information, and Hazard Specific, Appendix 5, Hazardous Materials Spill/Release, and is summarized in this section.

5.1.1 Discovery and Initial Notification

Upon identification of a fire, explosion, or hazardous waste release at the HWMF, the following actions must be initiated immediately:

1. The person discovering the fire, explosion, or hazardous waste release calls the SUBASENLON Dispatch Center at 911 on base or x3222 or (860) 694-3333.
2. The SUBASENLON Dispatch Center calls the SUBASENLON Fire Department (the first responder).
3. The SUBASENLON Dispatch Center notifies the Command Duty Officer (CDO) by telephone at (860) 625-9644.
4. The CDO consults with the Executive Officer (XO) and/or Commanding Officer (CO) in a major incident.

If it is manageable and safe to do so, the reporting employee should:

1. Remain in the area to provide known details when assistance arrives.
2. Activate the nearest fire alarm to evacuate potentially-impacted areas if the spill poses imminent danger to life or property, or if it has caused or threatens to cause a fire.
3. Rescue injured persons.
4. Stop source of spill or leak, if trained to do so.
5. Restrict all ignition sources if the potential exists for the presence of flammable vapors (e.g., gasoline, heaters, boilers, and electrical equipment).
6. Initiate response measures to minimize the spread of contaminants, if properly trained and authorized.

If sheltering-in-place is required, the CDO will coordinate with the Base Consolidated Telecommunications (BCT) staff to make Giant Voice announcements per Support Annex 20. The CDO will make voice reports to the Commander, Navy Region Mid-Atlantic (CNRMA) Regional Watch Officer at the Regional Operations Center as appropriate. Severe incidents will be reported within the Navy per Chief of Naval Operations Instruction (OPNAVINST) 3100.6J, Special Incident Reporting Procedures, 22 December 2009. Activations of the Emergency Operations Center (EOC) staff will be made from the EOC per the procedures and contact lists posted by the EOC door, and the Emergency Management Officer (EMO) will be notified by telephone at (860) 694-4275 for any incidents where EOC activation is required. Other environmental notifications, such as notifications to the EPA, United States Coast Guard, United States Department of the Navy (DoN), United States Department of Defense (DoD), United States Department of Energy (DOE), Connecticut Department of Energy and Environmental Protection (CT DEEP), and federal and local governments will be made by the Public Works Environmental Division.

The emergency coordinator is responsible for identifying the character, exact source, amount, and areal extent of any released materials. He may do this by observation or review of facility records or manifests, and, if necessary, by chemical analysis. Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are

generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).

5.1.2 External Notification

The Facility Incident Commander (FIC), with the SUBASENLON Public Works Department (PWD) Environmental Division, will make the decisions regarding which external agencies require notification and when such notifications are made, in accordance with the specific situation and applicable regulations. The FIC also determines when assistance from an outside organization is required. External notifications are made for multiple reasons, including the following:

1. To request assistance with the emergency response.
2. To notify external organizations for their situational awareness so they can take appropriate actions.
3. To inform an external organization such as the National Response Center or CT DEEP of a pollution event as required by federal or state law.

If the emergency coordinator determines that the facility has had a release, fire, or explosion that could threaten human health or the environment outside the facility, he must report his findings as follows:

1. If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated.
2. He must immediately notify either the government official designated as the on-scene coordinator for that geographical area, or the National Response Center using their 24-hour toll free number, (800) 424-8802. The report must include:
    (i) Name and telephone number of reporter.
    (ii) Name and address of facility.
    (iii) Time and type of incident (e.g., release, fire).
    (iv) Name and quantity of material(s) involved, to the extent known.
    (v) The extent of injuries, if any.
    (vi) The possible hazards to human health or the environment outside the facility.

Annex 2 of the SUBASENLON Integrated Contingency Plan (ICP) describes the procedures for notification and reporting, including contact phone numbers for internal emergency personnel and external organizations (NAVFAC, 2016b).

5.2 Response Procedures

The Fire Department will, as the situation dictates:

1. Ensure that all unnecessary personnel evacuate the hazard area.
2. Rescue any injured individuals if a rescue can be performed safely.
3. Secure the spill area to prevent unauthorized entry and establish safe distances.
4. Perform notifications as appropriate for the level and type of response.
5. Brief the CDO, as appropriate, on the current status of containment/ cleanup efforts.
6. Don appropriate protective clothing and equipment.
7. If flammable waste or material is involved, remove all ignition sources, and use spark- and explosion-proof equipment and clothing in containment and cleanup.
8. If possible, and if it can be done safely, try to stop the leak.
9. If a spilled substance reaches a storm sewer, try to stop flow from the source with sand, earth, sandbags, etc. and cover the storm drain.
10. If liquid material is collected, pump it into a temporary holding tank or drum as soon as possible.
11. Determine quickly the need to evacuate all or part of nearby buildings or the entire base and, as necessary, implement the evacuation procedures in the SUBASENLON Emergency Management Plan Attachment C, Evacuation Procedures. Building-specific evacuation plans and diagrams are posted at each building. The SUBASENLON evacuation plan that details evacuation routes from SUBASENLON and references community evacuation plans as appropriate is included in Attachment C, Evacuation Procedures, of the SUBASENLON Emergency Management Plan (DoN, 2016).

12. Clean up Level II spills and temporarily store waste from the spill cleanup at the Fire Department's authorized hazardous waste site at Building 107 as room allows. If this is not possible, take waste directly to Building 562.

13. Determine the major components in the material at the time of the spill.

14. Remove all surrounding materials that could react with the materials involved in the emergency.

15. Use absorbent pads, booms, earth, sandbags, sand, and other inert materials to contain, divert, and clean up a land spill if it has not been contained by a dike or sump.

16. Inform appropriate municipal officials if the release poses a threat to off-site locations, so they can determine the need to evacuate the public.

17. Request assistance from off-site emergency response facilities when deemed necessary.

5.3 Containment Procedures

During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing release waste, and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

SUBASENLON has access to adequate containment and recovery equipment available for responding to small and medium spills. For a worst-case discharge, SUBASENLON will contract the services of an oil service recovery organization (OSRO) that will provide additional containment and recovery equipment and resources. SUBASENLON internal response, containment, and recovery resources, e.g. booms, vacuum trucks, skimmers, etc., and capabilities of contractor OSROs are detailed in the SUBASENLON FRP (NAVFAC, 2016a). Decontamination procedures are found in Annex 3 of the ICP (NAVFAC, 2016b).

5.4 Incident Termination and Post-Incident Procedures

When a spill or release no longer poses any threat to life, the environment, or property, the FIC will announce termination of the emergency phase of the incident after confirming with the SUBASENLON CO. When determining whether an emergency has ended, the FIC will consider:

1. Remaining potential threat to human health and the environment.
2. Whether the incident has ceased or is under control.
3. Whether it is safe for personnel to enter evacuated areas.
4. The presence or availability of cleanup crews.

Formal termination procedures will follow all emergency incidents. These procedures include three steps:

1. Debriefing.
2. Post-incident analysis.
3. Critique.

If a hazardous waste cleanup operation is necessary, the SUBASENLON PWD Environmental Division will facilitate appropriate storage, transportation, and disposal. If the incident becomes an emergency again by posing a revived threat to people, the environment, or property, an emergency will be re-declared. Cleanup operations that are conducted as part of the emergency phase to help mitigate the incident will only be performed by properly trained and equipped personnel.

The emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility immediately after the emergency. The emergency coordinator must ensure that, in the affected area(s) of the facility, no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed, and all emergency equipment listed in this HWCP is cleaned and fit for its intended use before operations are resumed.

6.0 Emergency and Protective Equipment

In accordance with 40 CFR 264.52(e), this section presents a list of all emergency equipment maintained by the SUBASENLON PWD Environmental Division at the HWMF (Building 562), including fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment. Response equipment consists of the following materials, as applicable: Tyvek coveralls, plastic footwear covers, chemical gloves, cotton-leather gloves, and other response equipment including, but not limited to, sorbents and spill kits. The emergency equipment stored in Building 562, the HWMF, is listed in Table 4-1. The quantities listed represent the minimum kept on hand.

Table 4-1
HWMF Emergency Equipment

Equipment	Quantity	Description/Capabilities	Location
Absorbent material	5 bags	Clay-like material used to absorb and contain liquid spills.	Supply storage area
Absorbent boom	2 bags	Equipment used to contain liquid spills.	Supply storage area
Pads	2 boxes		
Pillows	4 cases		
Caustic spill kit	2	Neutralization and absorbent materials used for caustic, acid, and solvent spills.	Supply storage area
Acid spill kit	2		
Solvent spill kit	1		
Acid neutralization powder	One 5-gallon drum	Powder used for neutralization of acid spills.	Supply storage area
Spill kits	One 20-gallon drum, two 95-gallon overpack drums	Kits with absorbent socks, pads, and pillows used to absorb and contain spills.	Accumulation area and supply storage area
Open-top 55-gallon overpack drums	25 drums	Drums used to store spent absorbent and containment material or damaged drums.	Attached area
Open-top 85-gallon overpack drums	10 drums		

Equipment	Quantity	Description/Capabilities	Location
Saranex-coated Tyvek suits	15	Chemical suits designed for full-body protection against liquid spills.	Supply storage area and personnel lockers
Regular coated Tyvek suits	15		
Spill suits (rain gear, pants, and boots)	4		
Leather work gloves	10 pairs	Gloves for protection against harmful chemicals.	Supply storage area
Neoprene gloves	10 pairs		
Surgical gloves	2 boxes		
Hard hats	4	Hard plastic safety hats for head protection.	Personnel lockers
Full-face cartridge masks	4	Breathing apparatus with disposable cartridges to remove particles and toxics prior to inhalation.	Personnel lockers
Drain blocker	2	Protect storm drains from liquid spills.	Supply storage area
ABC dry chemical fire extinguishers	3 20-pound 2 10-pound	Wall-mounted portable firefighting apparatus.	Throughout building
Telephone system	1	Capable of internal and external communications.	Office
Cell phones	3		
Fire alarm system	1	Wall-mounted fire alarm box for signaling SUBASENLON Fire Department and siren.	Throughout building
Emergency shower and eye wash	1	Provides flooding sprays of water to flush chemicals splashed onto body.	Shipping/ receiving area
First aid kit	1	Wall-mounted cabinet containing bandages, aspirins, and other first aid equipment.	Shipping/ receiving area

7.0 Distribution and Coordination

A copy of this HWCP and all revisions will be maintained at the SUBASENLON Environmental Division. Copies of this HWCP will also be sent to, and coordinated with, the SUBASENLON Fire Department and all parties with which SUBASENLON maintains mutual aid agreements, as identified in Section 7.1.

7.1 Mutual Aid Agreements

Copies of mutual aid agreements and memoranda of understanding that SUBASENLON has with outside entities are kept on file with the SUBASENLON Fire Department.

7.1.1 Outside Fire Departments

Certain emergency incidents could occur at SUBASENLON that may be beyond the ability of installation personnel to handle alone. If off-site emergency assistance is needed, SUBASENLON has mutual aid agreements with the following Fire Departments and firefighting assistance organizations.

1. Old Mystic Fire Department
2. Ledyard Fire Department
3. Pequannock Bridge Fire Department
4. Center Groton Fire Department
5. Noank Volunteer Fire Department
6. Groton Long Point Fire Department
7. City of New London Fire Department/Hazardous Material (HAZMAT) Team
8. Mystic Fire Department
9. Gales Ferry Fire Department
10. Electric Boat Division of General Dynamics Fire Department
11. Pfizer Inc.

The SUBASENLON Fire Department will provide all relevant information about an emergency incident to the assisting Fire Departments.

7.1.2 Medical and Ambulance Services

SUBASENLON maintains memoranda of understanding with the following hospitals:

1. Lawrence and Memorial Hospital
2. William W. Backus Hospital

The Naval Branch Health Clinic is located on site and can handle basic life support emergencies Monday through Friday between 0730 and 1900 hours and Saturday between 0730 and 1600 hours.

If an individual is exposed to a hazardous material at SUBASENLON and is transferred to a hospital for treatment, a safety data sheet will be provided to the ambulance provider and sent with the exposed person to assist medical providers with appropriate treatment.

Mass casualty incidents require special measures to ensure that victims receive the best possible medical care and to ensure that the adverse impacts of the emergency are minimized. The Installation Commander has the authority to guide mass casualty response efforts. Additional resources consist of local mutual aid medical assets, Lawrence and Memorial Hospital, and William W. Backus Hospital. Additional information is provided in the SUBASENLON Installation Emergency Management Plan, SUBASENLONINST 3440.1E (DoN, 2016).

8.0 Evacuation Plan

In accordance with 40 CFR 264.52(f), this section presents the HWMF (Building 562) evacuation plan that will be followed for safe egress of facility personnel in the event of a fire, explosion, or release of hazardous waste or hazardous waste constituents at the facility. The response procedures for a spiller or discoverer of a spill are to sound the alarm, report the spill, and stand by until the response team arrives. Evacuation routes and outside rally points for any personnel located in the HWMF are identified on Figure 2-3. The evacuation plan is also prominently displayed in each room of the HWMF.

The initial actions to take for any evacuation are as follows:

- If imminent danger to life or property exists or if a fire threatens to start, activate the nearest fire alarm and evacuate upwind/upgrade to a safe distance.
- Rescue any injured persons, if safe to do so.
- Immediately report the spill to the SUBASENLON Dispatch Center at 911 on base or x3222 or (860) 694-3333.
- Alert people in adjacent spaces.
- Stop the source of the spill or leak, if possible and safe to do so.
- Restrict all ignition sources if flammable vapors are present or expected.
- If properly trained and authorized, initiate available on-site measures to minimize the spread of contaminants. Otherwise, stand by at a safe distance until emergency response personnel arrive on scene. Provide known details of the spill when assistance arrives.

The FRP will be followed for all subsequent actions (NAVFAC, 2016a). The FIC is responsible for determining whether further evacuations are necessary in the event of an emergency. An evacuation of all personnel in the vicinity of an emergency must be implemented under extreme conditions including when:

- Toxic fumes or gases are released (or a release is imminent).
- A fire that is too large to effectively suppress the flames with fire extinguishers or fire blankets.
- An explosion has occurred (or is imminent).
- Access for emergency responders must be provided.

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9.0 Required Reports

In accordance with 40 CFR 264.56(i), after any incident that requires implementing this HWCP, the following notations must be made in the operating record, and notification and reporting must be provided to the EPA Regional Administrator and CT DEEP Commissioner.

9.1 Operating Record

As soon as possible after the incident, SUBASENLON Environmental Division personnel will note in the operating record the time, date, and details of the incident that required implementing this HWCP.

9.2 Incident Report

Within 15 days after the incident, the Emergency Coordinator will submit a written report on the incident to the EPA Regional Administrator and CT DEEP Commissioner. The report must include the following:

1. Name, address, and telephone number of the owner or operator of the facility.
2. Name, address, and telephone number of the facility.
3. Date, time, and type of incident (e.g., fire, explosion).
4. Name and quantity of material(s) involved.
5. The extent of injuries, if any.
6. An assessment of actual or potential hazards to human health or the environment, where this is applicable.
7. Estimated quantity and disposition of recovered material that resulted from the incident.

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10.0 Amendment of Contingency Plan

In accordance with 40 CFR 264.54, this HWCP will be reviewed and immediately amended, if necessary, whenever any of the following occurs:

- The facility permit is revised.
- The HWCP fails in an emergency.
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency.
- The list of emergency coordinators changes.
- The list of emergency equipment changes.

After changes are made to the HWCP, revisions will be forwarded to all local police departments, fire departments, hospitals, and emergency response teams that may be called on to provide emergency service at SUBASENLON.

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11.0 References

DoN (United States Department of the Navy), 2016. Submarine Base New London Installation Emergency Management (EM) Plan. SUBASENLONINST 3440.1E. June 28.

NAVFAC (Naval Facilities Engineering Command), 2015. Spill Prevention, Control, and Countermeasures Plan, Naval Submarine Base New London, Groton, Connecticut. January.

NAVFAC, 2016a. Facility Response Plan, Naval Submarine Base New London, Groton, Connecticut. May.

NAVFAC, 2016b. Integrated Contingency Plan, Naval Submarine Base New London, Groton, Connecticut. May.

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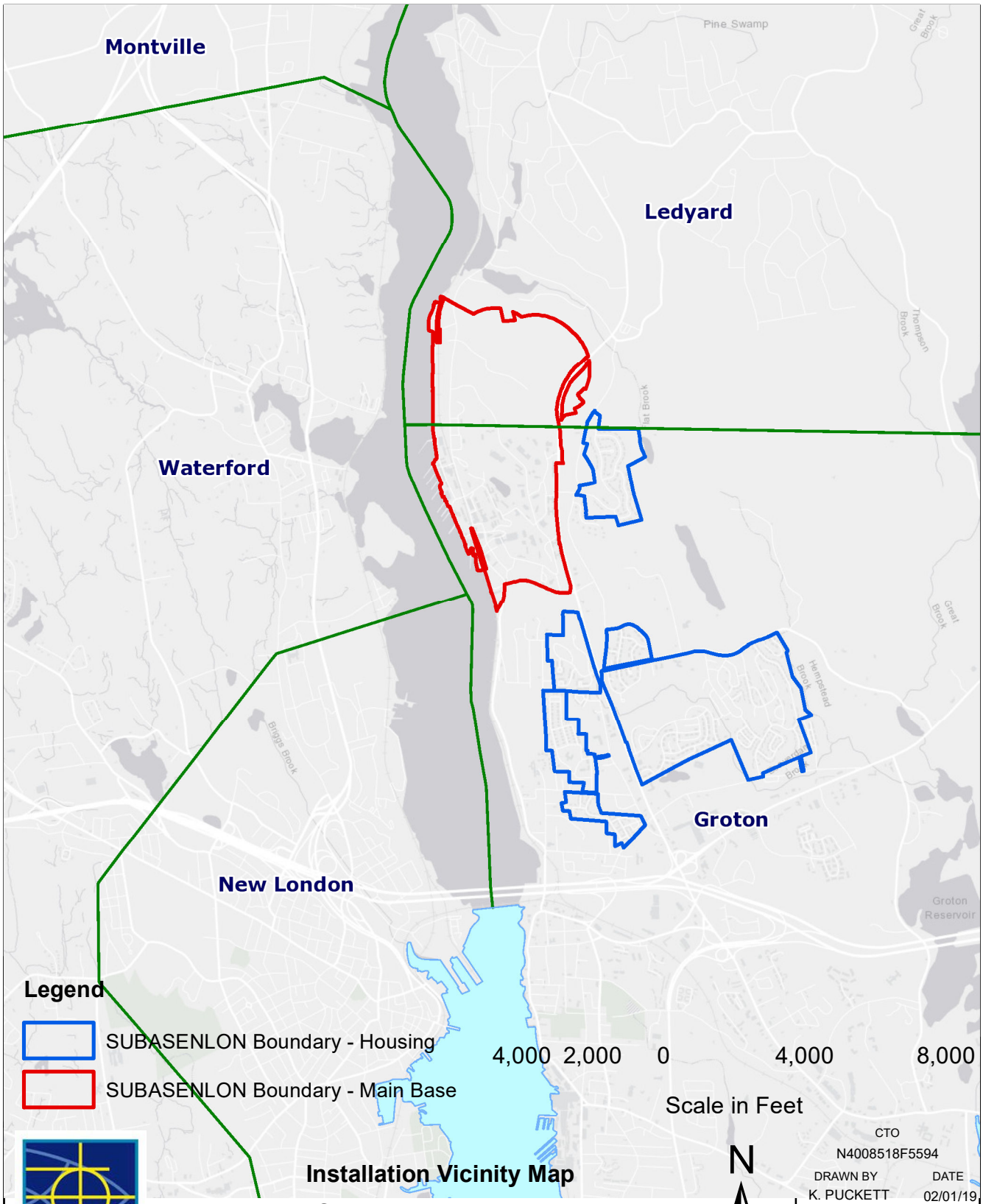

NAVFAC

Installation Vicinity Map

Naval Submarine Base New London
Groton, Connecticut

CTO	N4008518F5594
DRAWN BY	K. PUCKETT
DATE	02/01/19
APPROVED BY	J. FORRELLI
DATE	02/01/19
FIGURE NUMBER	2-1

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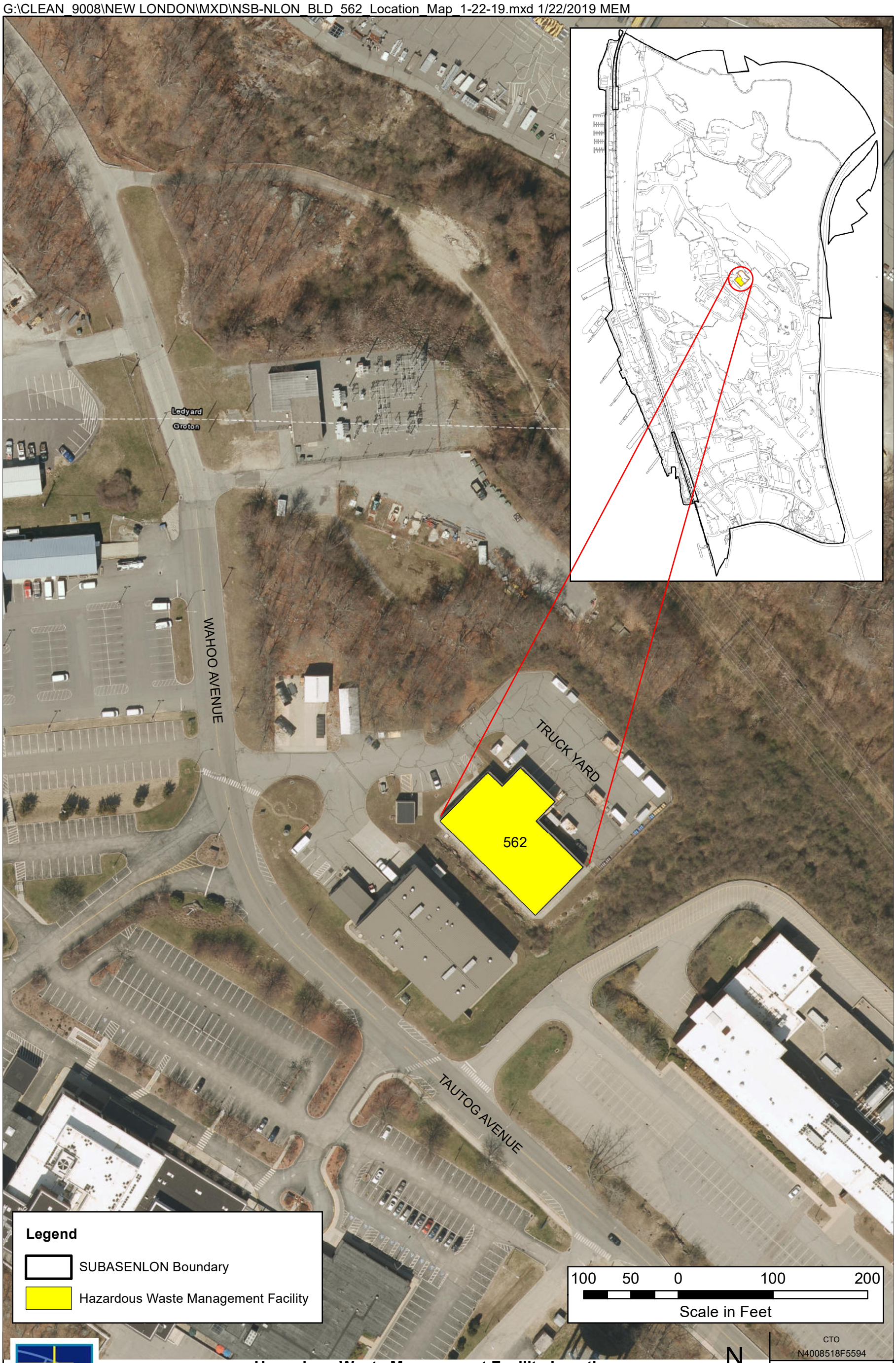
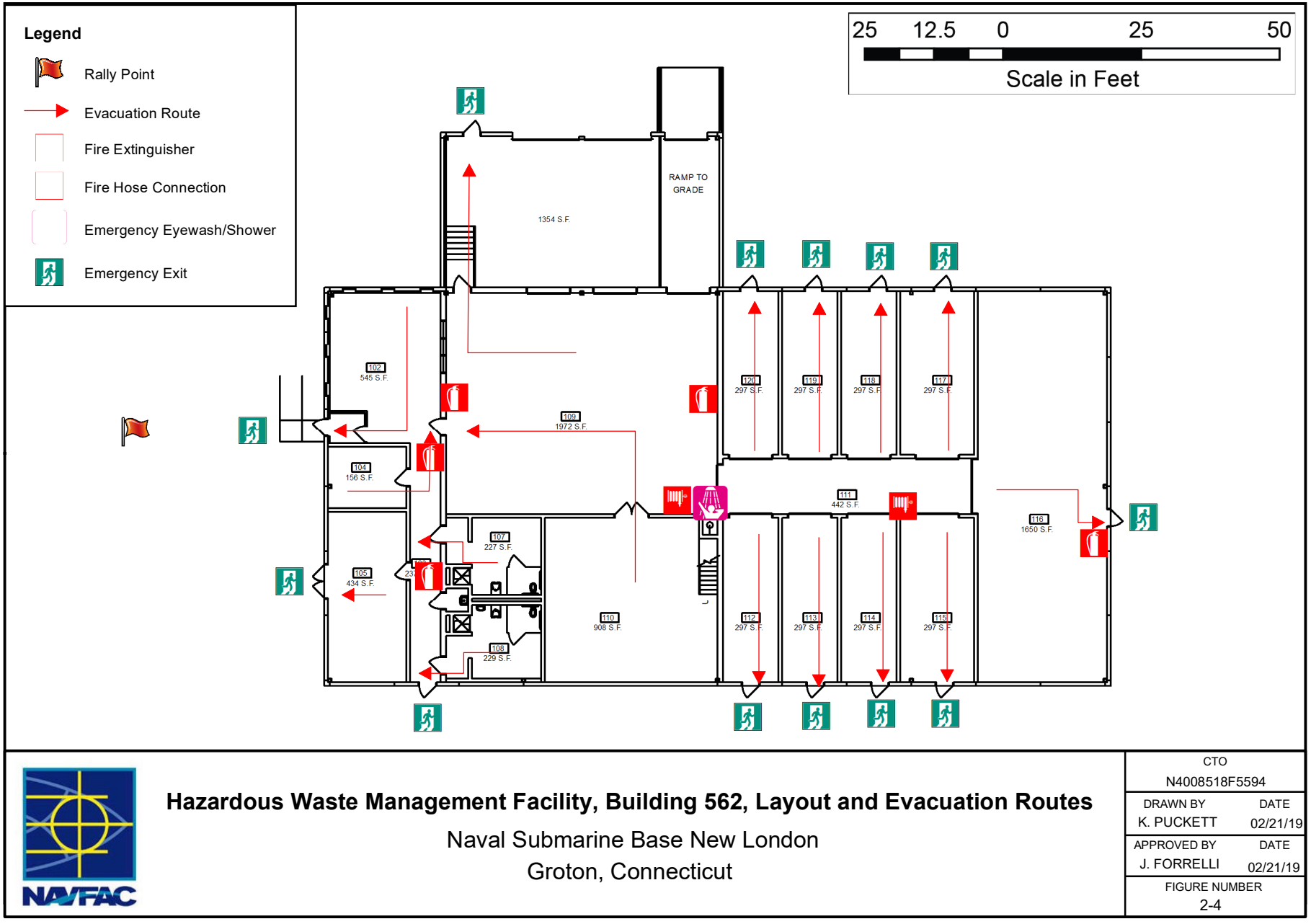


Hazardous Waste Management Facility Location

Naval Submarine Base New London

Groton, Connecticut

CTO	N4008518F5594
DRAWN BY	K. PUCKETT
DATE	01/22/19
APPROVED BY	J. FORRELLI
DATE	01/22/19
FIGURE NUMBER	2-2



NAVFAC

Hazardous Waste Management Facility, Building 562, Layout and Evacuation Routes

Naval Submarine Base New London

Groton, Connecticut

CTO	
N4008518F5594	
DRAWN BY	DATE
K. PUCKETT	02/21/19
APPROVED BY	DATE
J. FORRELLI	02/21/19
FIGURE NUMBER	
2-4	

ATTACHMENT E

CLOSURE PLAN
(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

Attachment Q – Closure Plan and Cost Estimate

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Acronyms and Abbreviations

CFR	Code of Federal Regulations
COC	Constituent of concern
CFR	Code of Federal Regulations
CT DEEP	Connecticut Department of Energy and Environmental Protection
DOHS	State of Connecticut Department of Health Services
EPA	United States Environmental Protection Agency
GC	Gas chromatograph
HWMF	Hazardous Waste Management Facility
MCC	Media closure criteria
PPE	Personal protective equipment
RCRA	Resource Conservation and Recovery Act
SUBASENLON	Naval Submarine Base New London
TCLP	Toxicity Characteristic Leaching Procedure
TSDF	Treatment, storage, and disposal facility

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Q.1 Introduction

In accordance with Resource Conservation and Recovery Act (RCRA) regulations contained in 40 Code of Federal Regulations (CFR) 264.111 through 264.115 (General Closure Requirements and Subparts I and J Specific Facility Requirements) and analogous state regulations, all owners and operators of hazardous waste facilities must close their facilities in a manner that:

- Minimizes the need for further maintenance.
- Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure release of hazardous waste, hazardous constituents, leachate, contaminated run-off or hazardous waste decomposition products to the ground water or surface water or to the atmosphere.
- Complies with the closure requirements of 40 CFR Subpart G, including, but not limited to, the requirements of 40 CFR 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, 264.601-264.603, and 264.1102.

The Closure Plan must include, at a minimum:

- A description of how and when the facility will be partially closed and ultimately closed.
- An estimate of the maximum inventory of wastes in storage or treatment at any given time.
- A description of the steps needed to decontaminate facility equipment, structures, etc., during closure.
- A description of any additional activities required during partial or final closure such as groundwater monitoring, leachate collection, etc.
- A schedule for final closure.

The procedures outlined in the following sections are to be followed for closure of the Hazardous Waste Management Facility (HWMF) (Building 562) at Naval Submarine Base New London (SUBASENLON) in Groton, Connecticut.

Q.2 Closure Performance Standard

The closure performance standard set forth in this plan requires that each greater-than-90-day hazardous waste storage area within Building 562 be decontaminated to a level

where all possible hazardous constituents have been removed to health- and environmental-based standards for all exposure pathways to achieve the goal of "clean" closure. The three exposure pathways of concern are inhalation, dermal contact, and ingestion.

It is, therefore, necessary to identify all Appendix VIII, 40 CFR 261 hazardous constituents that may be present. Due to the number of chemicals used to date at SUBASENLON, it was not possible to identify the Appendix VIII constituents that have been or will be used or managed on site. Therefore, at the time of closure, SUBASENLON will be required to determine the list of hazardous constituents managed within each greater-than-90-day hazardous waste storage bay by:

- Comparison of wastes managed within each area (e.g., waste analysis reports, waste profile sheets, etc.) with hazardous constituents listed under 40 CFR 261 Appendix VIII and/or 40 CFR 264 Appendix IX.
- Analysis of the concrete floor within each storage area for 40 CFR 264 Appendix IX constituents.

As stated above, potential human exposure to chemical contaminants can occur through three pathways, ingestion, inhalation, and dermal (skin) contact. The pathways associated with the regulated units are (1) direct ingestion of contaminated soil or concrete; (2) direct ingestion of groundwater that has come in contact with contaminated concrete or soil; (3) dermal contact with contaminated soil or concrete; and (4) inhalation of volatilized contaminants from the concrete surface in each regulated unit.

The site is presently zoned for industrial use; however, there are residential areas in the immediate vicinity of the site. The worst-case scenario, therefore, includes direct ingestion of contaminated soil (e.g., if the building area is disturbed, presenting a direct ingestion pathway) and direct ingestion of contaminated groundwater.

Media closure criteria (MCCs) (cleanup standards) must be developed for each hazardous constituent or constituent of concern (COC) identified using the following hierarchy:

1. The most stringent value obtained from: United States Environmental Protection Agency (EPA) Maximum Contaminant Levels (MCLs), State of Connecticut Department of Health Services (DOHS) Drinking Water Standards, or State of Connecticut DOHS Action Levels.
2. Calculated MCCs.
3. Hazard Limiting Values from Section 22a-174-29 of Connecticut's Air Pollution Control Regulations (for air only).

4. Background levels of the contaminants (for metals only) (if available).
5. Lowest analytical detection levels.

Q.3 Closure Plan

The facilities employed at Building 562 for the storage (greater than 90 days) of hazardous wastes include the following:

- Toxic waste storage area Bay 114 and 115
- Alkaline waste storage area Bay 113
- Ignitable waste storage area Bay 117
- Oxidizer waste storage area Bay 118
- Acid waste storage area Bay 120
- Reactive waste storage area Bay 119
- Shipping/receiving area Bay 109

SUBASENLON also employs an accumulation area within Building 562 for State-regulated waste located in Bay 116 and universal waste located in Bay 112.

The procedures to be followed by SUBASENLON to close the storage bays and shipping/receiving area in a manner that will minimize the need for further maintenance and protect human health and the environment are provided in Sections Q.3.1 through Q.3.3.

Q.3.1 Facility Operation

SUBASENLON employs nine separate bays for greater-than-90-day storage of hazardous waste containers at Building 562. These bays are used for storage of specified wastes generated on site and designated for off-site disposal. The maximum storage capacities of these areas are as shown in Table Q-1.

Table Q-1
Waste Storage Bay Capacities

Waste Storage Area	Bay Number	Max. Number of 55-Gallon Drums	Maximum Storage Volume (Liquid) Based on Secondary Containment (gallons)	Maximum Storage Volume (Solid and Liquid) (gallons)
Universal	112	20	935	1,100
Alkaline	113	20	935	1,145
Toxic II	114	40	935	2,200
Toxic I	115	80	1,810	4,445
State-Regulated	116	336	10,090	18,660
Ignitable	117	32	1,810	1,865
Oxidizer	118	20	935	1,145
Reactive	119	20	935	1,130
Acid	120	20	935	1,145

Within these areas, all containers are stored on wooden pallets or spill pallets to prevent contact with any spilled/leaked waste. To provide access for inspection, all rows of containers are provided with adequate aisle space from building walls and other rows of waste.

SUBASENLON also maintains a shipping and receiving area equipped with two 8-foot-wide loading docks and one 8-foot-wide entranceway. Located within the shipping and receiving area is a waste staging area.

Q.3.2 Waste Disposal

It has been assumed, for the purpose of this plan, that all wastes will require off-site disposal and that the storage areas will be at their maximum storage capacities. All containerized waste will be disposed of off site at a permitted hazardous waste facility.

Q.3.3 Closure Procedures

The procedures for closing the greater-than-90-day hazardous waste container storage bays and shipping/receiving area will incorporate the following steps:

Step 1: Review manifests, waste analysis reports, waste profile reports, etc. to determine the hazardous constituents or COCs managed within each bay/area.

Step 2: Dispose of all left over waste stored on site at a permitted hazardous waste facility.

Step 3: Collect concrete samples from the floor of each bay and area for Appendix IX analysis. Sampling and analysis procedures are provided in Section Q.4.2. Any parameter detected via this analysis will be added to those identified in Step 1.

Step 4: Dry sweep the concrete floor and inspect the floor of each bay/area for features such as expansion joints, cracks, gaps, and deteriorating concrete that could have allowed a release of contaminants. The sweepings will be stored in a 55-gallon drum and shipped off site with any soil removed from the coreholes (see Step 5 and Section Q.4.6).

Step 5: For each suspect area determined under Step 4, use a 4-inch core drill to reach the subsurface (see Section Q.4.3). From each core hole, collect a soil sample for analysis of all identified COCs (Steps 1 and 3). Prior to proceeding to Step 6, fill the core hole with concrete. If no suspect areas are identified, proceed to Step 6.

Step 6: Remove any hazardous constituents that may have contaminated the concrete floor within each bay/area using either a high-pressure steam cleaner or power washer. An industrial cleaner will be used with the steam cleaner or power washer.

Step 7: Collect all cleaning water generated in Step 6 using a wet vacuum. All cleaning water will be collected in 55-gallon drums or a vacuum truck. The cleaning water will be analyzed for pH, eight RCRA metals, and volatile organics by Toxicity Characteristic Leaching Procedure (TCLP) to determine its disposition location (i.e., as hazardous or non-hazardous waste). If the cleaning water is determined to be a hazardous, it will be disposed of off site at a permitted hazardous waste facility. If the cleaning water is determined to be a non-hazardous waste, it will be disposed of off site at a permitted non-hazardous waste facility. Sampling procedures are described in Section Q.4.5.

Step 8: Steam clean or power wash the floor after Step 7 using clean water only.

Step 9: Divide each bay/area into 16 equal-sized sections.

Step 10: Using a random number generator, select four sampling sites from the 16 sections. A fifth sampling site should be located in the area exhibiting the greatest visible contamination and not selected via the random number generator.

Step 11: From each selected sampling point, collect a concrete chip sample at least 100 grams in size from the center of the grid using a hammer and hand chisel. The hammer and chisel will be decontaminated after each sample using the procedure described in Section Q.10.

Step 12: Store the collected concrete chip samples in separate glass jars with Teflon seals and submit them to a certified laboratory for analysis of identified COCs (Steps 1 and 3).

Step 13: Compare the analytical results under Steps 5 and 12 to the closure performance standards.

Step 14: If closure performance standards cannot be achieved (an unexpected event), a modified Closure Plan will be submitted to Connecticut Department of Energy and Environmental Protection (CT DEEP) within 30 days (see Section Q.13).

Step 15: If all closure performance standards are met, perform a statistical analysis to justify the number of samples collected for analysis. The procedure discussed in Chapter 9 of Test Methods for Evaluating Solid Waste, 2nd edition, for random sampling will be followed.

Step 16: If it is determined under Step 15 that additional samples are needed, a number generator will be used to select the locations of the additional samples. Steps 9 through 13 will then be followed to determine the concentrations of parameters in the additional samples.

Step 17: If a sufficient number of samples have been collected and all closure performance standards have been met, the procedure outlined in Section Q.5 will be followed to determine if the inhalation pathway has been achieved.

Step 18: If the inhalation pathway is met, a clean closure certification will be submitted to CT DEEP within 30 days. If closure performance standards cannot be achieved (an unexpected event), a modified Closure Plan will be submitted to CT DEEP within 30 days (see Section Q.13).

Step 19: All contaminated personal protective equipment (PPE) and spill control equipment will be collected in 55-gallon drums and disposed of off site at a permitted facility.

Step 20: To store wastes generated from closure activities, temporary storage areas will be used. These areas will be located away from any floor drains, floor

trenches, etc. and provided with containment berms constructed of absorbent material (sandbags, etc.).

All waste generated during closure of the container storage areas will be manifested and shipped off site by a licensed waste hauler for treatment and/or disposal at a permitted waste facility. Because no testing is proposed for the discarded PPE, this waste will be managed and handled as hazardous waste.

All closure work will be supervised and performed using qualified personnel. Personnel will be equipped with the PPE described under Section Q.9. Chemical neutralization and spill control pillows will be employed in the event of spills resulting from the HWMF decontamination process. Strict supervision will include provisions for no open flames, hot surfaces, or smoking to be present in or around the work areas.

Q.4 Methods for Sampling and Analysis

The procedures described in this section will be used to sample and analyze the various media for the following events:

- Ambient air monitoring
- Appendix IX sampling
- Cracks or gaps in concrete floor sampling
- Concrete certification sampling
- Cleaning water sampling
- Soil sampling

Q.4.1 Ambient Air Monitoring

The storage bays, work area, and shipping/receiving area are expected to pose a minimal inhalation risk only during closure activities. Therefore, air monitoring will be conducted to protect the health of closure personnel and off-site personnel. Air monitoring for gross organic vapors will be conducted using a photoionization unit. This monitoring will be conducted to determine background levels, property boundary levels, and work area levels. This instrument yields direct measurements; therefore, no laboratory analyses are necessary. These readings will be taken hourly and recorded relative to background levels.

If at any time during closure activities, levels on the photoionization unit are detected greater than 5 parts per million above background levels, the area will be temporarily evacuated and the class of personal protection used during the closure activities will be upgraded.

The metallic constituents of concern should not pose an inhalation based threat because the materials that will be handled during closure will be wetted to control or eliminate the risk of inhaling metal-bearing dusts.

Q.4.2 Appendix IX Sampling

To determine the hazardous constituents that may be present within the storage bays, work area, and shipping/receiving area, concrete samples of the floor of each bay/area will be collected and analyzed for 40 CFR 264 Appendix IX constituents. The Appendix IX samples will be collected in the following manner:

Step 1: Divide each bay/area into 16 equal-sized sections.

Step 2: Using a random number generator, select four sampling sites from each bay/area. Select one additional sampling site from each bay/area in the area exhibiting the greatest visible contamination and not selected via the random number generator.

Step 3: From the center of each selected site in the bay/area, a hammer and hand chisel will be used to collect a concrete chip sample.

Step 4: Place the sample collected from each sampling point into two 8-ounce jars, one jar filled to the top and sealed for analysis of volatiles (if that grid square is selected; see below) and one jar one-half filled for headspace analysis.

Step 5: The hammer and hand chisel will be decontaminated between sampling points as outlined in Section Q.10.

Step 6: To determine the sampling site for volatile constituents (via EPA method 8240) a portable gas chromatograph (GC) will be used. Headspace analysis of the five half-full jars collected from the five sample points of each bay/area will be analyzed, and the sample with the highest headspace contamination will be selected for that bay/area. The matching full jar will be submitted to a Connecticut-certified laboratory for analysis under a signed and dated chain-of-custody form, and the contents of the remaining four full jars will be returned to the appropriate bay/area.

Step 7: The contents of the five half-full jars from each bay/area will be thoroughly composited (mixed) and placed into another 8-ounce jar (full jar) for analysis of metals, inorganics, and semivolatile constituents. Any excess material will be returned to the storage area.

Any additional contaminants detected via Appendix IX sampling will be added to the list of constituents identified in Section Q.3.3, Step 1 for that specific bay/area.

Q.4.3 Sampling of Cracks and Gaps in Concrete Floor

To determine if the subsurface of the storage bays, work area, and/or shipping/receiving area have been affected by past operations, the following procedure will be followed:

Step 1: Dry sweep the concrete floor and inspect the floor for features such as expansion joints, cracks, gaps, and deteriorating concrete that could have allowed a release of contaminants. The sweepings will be stored in a 55-gallon drum and shipped off site with any soil removed from the coreholes (see Step 6 and Section Q.4.6).

Step 2: For each suspect area determined under Step 1, use a 4-inch core drill to reach the subsurface.

Step 3: Inspect the cross section of the core plug to determine if the feature (crack, gap, etc.) extends through the plug.

Step 4: If the feature extends through the plug, analyze the underlying soil for the COCs identified for that specific bay or area by both mass and TCLP analysis. The analysis will be performed by a Connecticut-certified laboratory, and samples will be delivered to the laboratory under a signed chain-of-custody form.

Step 5: If the feature does not extend through the plug, analyze the soil vapors in the corehole using a portable GC analyzer. If volatile organics are detected in the corehole, analyze the soil as described in Step 4. If no organic vapors are detected in the corehole, sampling and analysis of the underlying soil is not necessary at this sampling point. If all features do not extend through the plugs and do not exhibit organic vapors via the portable GC, proceed to Step 6.

Step 6: Upon completion of Steps 1 through 5, the coreholes will be filled with clean sand to the base of the concrete floor, filled with the core plug (if still available), and regrouted before proceeding with closure activities. Any soil removed from coreholes and concrete cores that cannot be replaced will be stored in 55-gallon drums and sampled and analyzed per the procedures described in Section Q.4.6 to determine final disposition locations.

Q.4.4 Certification Sampling of Concrete Floors

The concrete floor (base) within the storage bays, work area, and shipping/receiving area will be sampled to determine if the closure performance standards have been met. Each bay/area will be sampled in the following manner:

Step 1: Divide the base of each area into 16 equal sections.

Step 2: Using a random number generator, select four sampling sites from each bay/area. A fifth sampling site will be selected in each bay/area in the area exhibiting the greatest visible contamination and not selected via the random number generator.

Step 3: From each selected sampling point, collect a concrete chip sample at least 100 grams in size from the center of the grid using a hammer and hand chisel. The hammer and chisel will be decontaminated after each sample using the procedure described in Section Q.10.

Step 4: Store the collected concrete chip samples in separate glass jars with Teflon seals and submit them to a Connecticut-certified laboratory for analysis of the COCs identified for that specific bay or area (by both mass and TCLP) under a signed and dated chain-of-custody form.

Q.4.5 Cleaning Water Sampling

The equipment decontamination wastewaters and floor wash water will be stored in 55-gallon drums or vacuum trucks. Composite wastewater/wash water generated during closure activities will be collected and analyzed for pH, eight RCRA metals, and volatile organics to determine if the wastewater/wash water must be disposed of as a hazardous waste or State-regulated waste. After the determination has been made, the wastewater/wash water will be properly disposed of off site to a permitted facility.

Sampling Procedures:

Step 1: Collect an 8-ounce glass jar of water from each drum of wastewater/wash water with a dedicated glass thief, being sure to collect a representative sample from each drum by inserting the thief to the bottom of the drum each time. For a vacuum truck, the sample will be collected from the top, middle, and bottom using a weighted bottle or similar device.

Step 2: Submit samples to a Connecticut-certified laboratory for analysis under a signed and dated chain-of-custody form.

Q.4.6 Soil Sampling

The soil and concrete cores generated during closure activities will be collected and stored together in 55-gallon drums. A sample will be collected from the bottom, middle, and top of each drum using an auger. These samples will be composited and analyzed for the eight RCRA metals by TCLP. A sample collected from the bottom of one of the drums will be analyzed for the volatile organic portion of the TCLP analysis. The results of these analytical procedures will be used to determine if the soil/concrete must be disposed of as a hazardous waste or State-regulated waste. After the determination has been made, the soil/concrete will be properly disposed of off site at a permitted facility.

Q.5 Air Inhalation Pathway

If upon completion of Sections Q.3 and Q.4, it is determined that the ingestion pathway closure standards have been achieved in a storage bay or area, the following procedure will be followed for each area to verify that the closure criteria for the air inhalation pathway have also been achieved for this storage bay or area:

Step 1: Calculate the total mass of the concrete slab (slab volume x density of concrete).

Step 2: Measure the room dimensions and calculate the volume of air in the storage area in cubic meters.

Step 3: For each sample collected from the floor proposed to remain in place, calculate the worst-case room air concentration for each parameter using the following equation and the mass analysis results obtained under Section Q.4.4:

$$C_{ra} = \frac{\mathrm{C}_C * \mathrm{M}_C}{\mathrm{V}V_{RA}}$$

where,

C_{ra} = Concentration of room air for a given parameter (mg/m^3).

C = Mass concentration of a given constituent in the concrete (mg/kg).

M_c = Mass of concrete slab (kg).

V_{RA} = Volume of room air (m^3).

Step 4: Compare the calculated concentration C_{ra}, to the closure performance standard.

Q.6 Sample Containers and Preservation

The various samples collected under Section Q.4 will be placed into the appropriate container and preserved as shown in Table Q-2.

Q.7 Analytical Procedures

The various samples will be collected and stored as described above and in previous sections. Upon delivery to the certified laboratory, the samples will be analyzed for the appropriate parameters as discussed in the preceding sections. Due to the sample matrices (solids such as concrete) and pathways of concern, some samples must be prepared prior to analysis by the appropriate method for a given parameter. The recommended sample preparation methods are shown in Table Q-3. The analytical methods used to analyze each constituent must be listed under SW-846 or approved by CT DEEP.

Q.8 Field Quality Assurance/Quality Control Program

To monitor field sampling activities, certain quality assurance/quality control activities must be performed to ensure the accuracy and validity of samples collected and the corresponding results. During closure activities, equipment blanks and trip blanks will be collected for this purpose. These blanks will be used for the concrete/soil sampling defined in Sections Q.4.3 and Q.4.4. These blanks will be collected at a minimum frequency of one of each type of blank per 20 samples per day. Equipment blanks will consist of deionized water that is transported to the site, opened in the field, poured through or over the sampling device, collected in a sample container, and sent to the laboratory. Trip blanks will consist of deionized water that is transported to the site and sent to the laboratory without being opened.

Table Q-2
Sample Collection and Preservation Requirements

Sample Type (sample size)	Parameter	Container	Preservation	Holding Time
Concrete/Soil (200 grams)	Metals	Glass	Cool to 4°C	6 months
Concrete/Soil (200 grams)	Organics	Glass(1)	Cool to 4°C	7 days(2)
Cleaning Water (size will be determined by certified laboratory)	Metals	Glass	Cool to 4°C	6 months
Cleaning Water (size will be determined by certified laboratory	Organics	Glass(1)	Cool to 4°C	7 days(2)

1 With Teflon seal.
2 Until extraction.

Table Q-3
Recommended Sample Preparation Methods(1)

Sample	Parameter	Mass Analysis	Leachability	Description
Concrete/Soil	Metals	3050	1311 (TCLP)	Certification Sampling
Concrete/Soil	Volatile Organics	5030	1311 (TCLP)	Certification Sampling
Soil	Metals	3050	1311 (TCLP)	Cracks Sampling Gaps Sampling
Soil	Volatile Organics	5030	1311 (TCLP)	Cracks Sampling Gaps Sampling
Concrete	Metals	3050	NA	Appendix IX Sampling
Concrete	Volatile Organics	5030	NA	Appendix IX Sampling
Cleaning Water	Metals	3050	NA	Decontamination
Cleaning Water	Volatile Organics	5030	NA	Decontamination

1 Test Methods for Evaluating Solid Waste: Physical/Chemical Methods Compendium, EPA SW-846, Update V, July 2014.

Q.9 Personnel Protection

All personnel involved in closure inspection, sampling, decontamination, and removal activities will have been trained with respect to the applicable provisions of the Occupational Health and Safety Act. To ensure the safety of site workers, appropriate PPE will be used as required for the site activity in progress.

Recommended personal protection levels for the different site activities are shown in Table Q-4, and the appropriate PPE for the different levels of protection is shown in Table Q-5.

To determine when conditions exist that would cause the contingent level of protection to be used, ambient air monitoring of the work area will be conducted as described in Section Q.4.1.

Table Q-4
Recommended Levels of Personal Protection

Activity	Personnel	Recommended Level of Protection (Contingent Level)(1)
Removal of Waste Material	All personnel	Level C
Decontamination of the Floors	All personnel	Level C
Sampling	All personnel	Level D (Level C)

1 The criteria for upgrading to the contingent level of personal protection are ambient air reading in the breathing zone above background readings.

Table Q-5
Personal Protective Equipment

Level	Equipment
D	Work Clothes Work Boots Gloves Safety Glasses Chemical-Resistant Boots Hard Hat (Optional)
C	Full-Face Air Purifying Respirator Chemical-Resistant Clothing Chemical-Resistant Gloves Chemical-Resistant Boots

Q.10 Equipment Decontamination

To carry out the closure activities outlined in this report, the following equipment may be used:

- Dry/wet vacuums
- Vacuum truck with necessary hoses (if necessary)
- Shovels
- Steam cleaner/power washer
- 55-gallon drums
- Squeegees
- Concrete core drill
- Hammer and chisel
- Air purification respirators
- Jackhammer

Prior to placing this equipment back into service, the procedures outlined below will be followed to remove any residue.

Step 1: All decontamination procedures will be performed in an area located away from any floor drains, floor trenches, etc. To prevent any runoff from this area, a 4- to 6-mil piece of plastic will be elevated 6 to 8 inches using sandbags or bags of absorbent material stationed around the decontamination area.

Step 2: Equipment will be first cleaned using brushing and brooms to remove any visible residue.

Step 3: All residue (liquid) collected from this operation will be placed in 55-gallon drums and sampled as described in Section Q.4.5 to determine final disposition location.

Step 4: To remove any residue remaining on the equipment, the following washing procedure will be followed:

Small Equipment

A. Small equipment such as shovels will be washed and rinsed over an open 55-gallon drum. A laboratory soap containing the active ingredient trisodium phosphate will be used in the washing operation.

B. The wash and rinse waters will be collected in the 55-gallon drum and sampled as described in Section Q.4.5 to determine final disposition location.

C. Any spillage from this operation will be absorbed with speedy dry or sand and shoveled in a 55-gallon drum and sampled as described in Section Q.4.5 to determine final disposition location.

Large Equipment

A. Large equipment such as the backhoe, if required, will be first stationed on a 4- to 6-mil piece of plastic. The four sides of this plastic will then be elevated 6 to 8 inches using bags of sand or absorbent material to form a dike to collect wash and rinse waters.

B. Using brushes and brooms, the large equipment will be washed using a laboratory soap containing the active ingredient trisodium phosphate.

C. Using pressurized water, all soap will be removed.

D. The wash and rinse waters collected in the dike will then be pumped into 55-gallon drums and sampled as described in Section Q.4.5 to determine final disposition location.

E. Following removal of wash and rinse water, the piece of plastic will be placed in a 55-gallon drum and sampled as described in Section Q.4.5 to determine final disposition location.

Step 5: All disposable safety equipment such as coveralls, gloves, etc., will be collected in 55-gallon drums and disposed of off site at a permitted hazardous waste facility.

Sampling and analysis of equipment after decontamination is not considered necessary. Rather, a visual examination verifying removal of all soil and stains should be sufficient to ensure that all contaminants are removed.

All decontamination work will be supervised and performed by qualified personnel. Qualified personnel will be required to be trained regarding the hazards of the substances to which they may be exposed and in the proper use of PPE prior to the start of decontamination activities.

Q.11 Schedule for Closure

Table Q-6 details the closure schedules for the storage bays, work area, and shipping/receiving area. The requirements of 40 CFR 264.113(d) and (e) do not apply to SUBASENLON.

Q.12 Extension of Closure Time

If it is determined that the closure time period will exceed 180 days after receiving the final volume of hazardous waste, SUBASENLON will submit a petition for a closure time extension that justifies that a longer period of closure time is necessary. This petition will be submitted at least 30 days prior to the expiration of the 180-day closure period.

Q.13 Amendment of Approved Closure Plan

In accordance with 40 CFR 264.112(c), SUBASENLON will amend the approved Closure Plan prior to closure whenever: (1) changes in operating plans or facility design affect the Closure Plan; or (2) whenever there is a change in the expected year of closure of the facility; or (3) during conducting partial or final closure activities, unexpected events require a modification of the approved Closure Plan. These amendments will be made at least 60 days prior to the proposed change in facility design or operation, or no later than 60 days after an unexpected event has occurred that affects the Closure Plan.

If an unexpected event occurs during partial or final closure, SUBASENLON will submit a modified plan within 30 days after the unexpected event. Such unexpected events include the inability to close the regulated units as "clean". If extensive contamination exists and closure cannot be completed according to the approved plan, SUBASENLON will submit a modified plan to close Building 562 with the appropriate Post-Closure Plan. If the amendment to the plan is defined as a major modification according to 40 CFR 270.41 and 270.42, the modification to the plan will have to be approved according to the procedures in 40 CFR 264.112(d)(4).

Table Q-6
Closure Schedule for Building 562

Closure Activity	Completion Date
1. Notify CT DEEP of expected closure	Day 1
2. Final date for accepting wastes	Day 180
3. Beginning of closure period	Day 180
4. Removal of leftover wastes	Day 210
5. Conducted Appendix IX sampling as discussed in Section Q.4.2	Day 240(1)
6. Inspect concrete floors for cracks and gaps	Day 300(1)
7. Sample the concrete floor and suspect areas as discussed in Section Q.4.3	Day 310(1)
8. Decontaminate and sample the concrete floors as discussed in Section Q.4.4	Day 315(1)
9. Review analytical results to determine if clean closure by the ingestion pathway has been achieved. If this pathway cannot be achieved, submit a modified Closure Plan to CT DEEP (see Section Q.13)	Day 330(1)
10. Determine if clean closure criteria for the air inhalation pathway have been met. If these criteria cannot be achieved, submit a modified Closure Plan to CT DEEP (see Section Q.13)	Day 340(1)
11. Dispose of rinse water, contaminated clean-up material, and contaminated PPE	Day 350
12. End of closure period	Day 350
13. Certification of closure by a Professional Engineer	Day 380(1)

1 Closure activity will be supervised by the certifying organization.

Q.14 Closure Cost Estimate

In accordance with 40 CFR Sections 264.142(a) and 270.14(b)(15), the estimated cost to complete closure of the storage bays, work area, and shipping/receiving area is provided in Table Q-7. All costs are based on 2018 dollars and assume that a third party will perform the closure activities. These costs are based on the following:

1. Operator at $60 per hour
2. Supervisor at $70 per hour
3. Disposal of wastes at the following rates:
    - Contaminated clean-up and PPE at $370 per drum
    - Cleaning water at $165 per drum or $.85 per gallon (bulk)
4. Waste transportation at $395 per trip
5. Equipment
    - Basic safety equipment (per person) at $110 per day
    - Tools at $55 per day
    - Air monitoring equipment at $135 per day
    - Pressure washer at $215 per day
6. Professional Engineer at $125 per hour
7. Laboratory analysis
    - Concrete sample at $745 each
    - Appendix IX sample at $1,785 each
    - Cleaning water sample at $325 each
    - Equipment and field blank samples at $585 each

8. Waste materials
    - 55-gallon drums at $405 per drum (average)

Table Q-7

Closure Cost for Building 562

Activity	Cost
A. Disposal of drummed wastes	
• 32 drums x $560/drum (toxic waste storage area)	$17,920
• 16 drums x $500/drum (alkaline waste storage area)	8,000
• 16 drums x $500/drum (reactive waste storage area)	8,000
• 32 drums x $255/drum (ignitable waste storage area)	8,160
• 16 drums x $320/drum (oxidizer waste storage area)	5,120
• 16 drums x $380/drum (acid waste storage area)	6,080
• 4 drums x $320/drum (process room)	1,280
B. Transporting of drummed wastes	
• 2 trips x $395/trip	$790
C. Labor to handle drummed wastes	
• 132 drums @ 80 drums/hour x $60/hour	$ 99
• 2 hours supervision x $70/hour	140
D. Inspection and Sampling of Cracks/Gaps	
• Operators (2) @ 8 hours/each x $60/hour	$960
• Supervisor © 8 hrs. x $70/hour	560
• Laboratory analysis, 5 samples @ $745/each (est.)	3,725
• 1 field/equipment blank @ $585	585
• Safety equipment and tools @ $300/day x 1 day x 2 operators	600
E. Decontamination of Storage Bays/Areas	
• Operators (2) @ 24 hours each x $60/hour	$ 2,880
• Supervisor @ 24 hours x $70/hour	1,680
• Pressure washer rental, 3 days @ $215/day	645
• 1 soil/concrete sample @ $420	420
• 1,000 gallons of cleaning water @ $.85/gallon	850
• Transportation, 1 trip x $395/trip	395
• Appendix IX analyses, 8 samples x $1,785/sample	14,280
• Certification concrete sampling, 40 samples @ $745/each	29,800
• 2 equipment/blank samples analysis @ $615/each	1,230
• 1 cleaning water analysis @ $325/each	325
• Safety equipment and tools © $300/day x 3 days x 2 operators	1,800
F. Disposal of PPE	
• Disposal of 1 drum @ $370/drum	$ 370
• Transportation @ $395/trip	395
G. Professional Engineer Certification of Closure	
• 8 hours x $185/hour	$ 1,480
Subtotal	$118,569
10% Contingency	$ 11,857
Total	$130,426

Q.15 Certification of Closure

Certification at the completion of closure by a licensed professional engineer is required. A member of the certifying organization will be present during all major closure activities to ensure that the approved Closure Plan is executed (see Table Q-6). The following certification will be submitted to CT DEEP within 60 days of completion of closure activities.

"I _____

for_____, a hazardous waste TSDF, and I, _____, P.E., employed by _____ certify by means of signatures, that the facility named above has been closed in accordance with the method specified by the Closure Plan and attached hereto.

_____	_____, P.E.
Company Name	Engineer
_____	_____
Date	Date

Along with the closure certification, a list of departures from the plan, a photographic record, sampling results, manifests, and any other pertinent documents verifying closure will be provided to CT DEEP and EPA.

Q.16 Notification of Partial Closure and Final Closure

SUBASENLON will notify CT DEEP in writing at least 45 days prior to the date on which final closure of Building 562 is to begin. The date SUBASENLON "expects to begin closure" will either be no later than 30 days after the date that the final volume of hazardous waste is received at the HWMF or, if there is a reasonable possibility that the HWMF will receive additional hazardous waste, no later than 1 year after the date that the most recent volume of hazardous waste was received.

The requirements of 40 CFR 264 Subpart G will not preclude SUBASENLON from removing hazardous wastes and decontaminating the HWMF in accordance with this Closure Plan (upon approval) at any time before or after notification of final closure.

Q.17 Closure Cost Adjustment

Within 30 days after the end of SUBASENLON's fiscal year, the closure cost estimate (see Section Q.14) will be adjusted using the Department of Commerce's Annual Implicit Price Deflator for the Gross National Product. The closure cost will also be revised no later than 30 days following CT DEEP's approval of a modification request (e.g., determine contamination is to the subgrade), if the change in the Closure Plan increases the cost of closure. The latest closure cost estimate will be maintained at the SUBASENLON Environmental Department (Building 166).

Q.18 Survey Plat

Not applicable to SUBASENLON.

Q.19 Post-Closure Care and Use of Property

Not applicable to SUBASENLON.

Q.20 Post-Closure Plan Amendment

Not applicable to SUBASENLON.

Q.21 Post-Closure Notices

Not applicable to SUBASENLON.

Q.22 Certification of Completion of Post-Closure Care

Not applicable to SUBASENLON.

TABLES **TITLE**

Table II-1	Container Storage Bays in Building 562 (HWSB-562) Permitted Capacities
Table II-2	Process Room Permitted Activities and Wastes

(Per RCRA Permit Application – Dated February 2019, received on March 8, 2019)

NAVAL SUBMARINE BASE NEW LONDON (SUBASENLON)
ROUTE 12/CRYSTAL LAKE ROAD
GROTON, CONNECTICUT

PERMIT No. DEEP/HWM-095-005
EPA ID No. CT4170022020

TABLE II-1
CONTAINER STORAGE BAYS IN BUILDING 562 (HWSB-562)
PERMITTED CAPACITIES

WASTE GROUP	STORAGE BAY NUMBER	MAXIMUM NUMBER OF CONTAINERS (55-gallon cap.)[1]	MAXIMUM WASTE STORAGE CAPACITY	Waste Codes
Universal	112	20	**1100** gallons	D002, D004-D043
Alkaline	113	20	**1145** gallons	D002, D004-D043 F001, F002, F003, F004, F005, F027
Toxic	114 and 115	120	**6,645** gallons (FOR BOTH BAYS)	D004-D043 F001, F002, F004, F005, F027, P001, P075, P030, P042, P081, U003 U021, U028, U032, U037, U039, U041, U043, U044, U052, U061, U068, U069, U072, U075, U079, U080, U103, U117, U121, U122, U129, U135, U145, U151, U161, U162, U165, U188, U204, U210, U211, U213, U220, U226, U227, U228, U248, U359
Connecticut Regulated	116[2]	336	**18,660** gallons	CR01, CR02, CR03, CR04, CR05
Ignitable	117	32	**1,865** gallons	D001, D002, D004-D043, F001-F005, F027, U002, U003, U019, U031, U045, U112, U117, U154, U159, U161, U162, U186, U239
Oxidizer	118	20	**1,145** gallons	D001, D002, D004-D043 F001, F002, F004. F005, F027
Reactive	119	20	**1,130** gallons	D003, F001-F005, P042, U133, U162, U223
Acids	120	20	**1,145** gallons	D002, D004-D043, F001, F002, F003, F004, F005, F027, U134, U162
Total Capacity			**32,835 gal**	

[1]Or any size combination as long as the total volumetric capacity does not exceed the maximum bay storage capacity.
[2] Both RCRA and non-RCRA wastes may be stored in Storage Bay 116.

TABLE II-2

PROCESS ROOM PERMITTED ACTIVITIES AND WASTES

TREATMENT PROCESS	WASTE TYPES	WASTE CODES
Aerosol Can Puncturer	Chemical Liquids	All TCLP codes could be included (except pesticides and herbicides)
Mercuric Nitrate Reclamation Unit	Mercury-contaminated waste	All TCLP codes could be included (except pesticides and herbicides)
Oil Filters Crusher	Oil Filters	N/A