

# Chapter 1

## Introduction

This Hazardous Waste Management Manual (HWMM) prescribes responsibilities, policies, and procedures for storing and managing hazardous material (HM) and hazardous waste (HW) within the United States Coast Guard (USCG). The HWMM is written to ensure that the USCG is in compliance with applicable federal, state, and local laws and regulations.

This HWMM is formatted like a technical manual (TM), with easy-to-follow procedures and plenty of visual cues. To use this HWMM, look on the front cover to see what chapter contains the information needed, and then turn to the tab for that chapter.

It is the policy of the USCG to manage this HWMM in an environmentally acceptable manner and in accordance with (IAW) all federal, state, and local requirements. Continuous effort will be made to reduce the volume of HW and HM used and produced at USCG facilities. It is also the policy of the USCG to minimize, to a practical extent, the amount and toxicity of HW generated because of its activities. Waste minimization practices for the USCG include the following:

- Reuse of materials in a controlled environment whenever and as long as possible before determining that they are wastes
- Recycling of off-specification fuels, used oil, antifreeze, and other materials through an Environmental Protection Agency (EPA) approved recycling apparatus, or through a qualified and permitted contractor as technology and availability allow
- Segregation of waste to avoid contamination of non-hazardous waste
- Use of aqueous parts washers to minimize or eliminate the use of degreasing solvents for activities other than parts cleaning in government or contractor-owned solvent-cleaning machines
- Substitution of non-hazardous products where feasible

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## **1.1 Purpose and Scope**

This HWMM documents the USCG HM and HW management program. It applies to Coast Guard units, tenants and contractors that generate waste.

## **1.2 Reviews and Revisions**

This HWMM supercedes COMDTINST M16478.1B Hazardous Waste Management Manual dated March 25, 1992. The Environmental Management Division Commandant (G-SEC-3) will review this HWMM for content at least once every year. Commandant (G-SEC-3) will update the Manual update as necessary.

## **1.3 Applicable Regulations**

### **Federal Regulations**

To adhere to the Federal Facilities Compliance Act (FFCA), the USCG must manage its waste IAW the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). The FFCA, another RCRA amendment, further requires that all federal facilities comply with federal HW laws and regulations. Section 102(b)(1) of the FFCA states that the EPA “shall initiate an administrative enforcement action against such a department...in the same manner and under the same circumstances as an action would be initiated against any other person.”

Federal waste management regulations are codified in Title 40 of the Code of Federal Regulations (CFR). This HWMM provides procedures for complying with the following parts of 40 CFR:

- Part 260 through Part 272 for the regulation of HW
- Part 273 for the regulation of universal waste
- Part 279 for the regulation of used oil

The USCG must also comply with the following regulations:

- 49 CFR Parts 170 through 177 regarding the U.S. Department of Transportation (DOT) requirements
- 29 CFR Part 1910 regarding the U.S. Occupational Safety and Health Administration (OSHA) requirements

### **State Regulations**

Particular state regulations governing the handling and management of HW are contained in Volume II of this manual, the Civil Engineering Unit (CEU) supplements. Always refer to

the respective CEU supplement for all HW operations and management practices. Each CEU supplement addresses the applicable state regulations affecting operations and management of HW at the particular unit or facility location.

## **Military Regulations**

All USCG units that are tenant activities on Department of Defense or other federal installations must comply with the host's directives and instructions in addition to federal, state and local environmental laws and regulations.

## **1.4 Responsibilities**

The following responsibilities are organized according to the USCG command structure:

### **Headquarters**

Commandant (G-SEC-3) will:

- Plan, develop, promulgate, and update procedures for; as well as implement, monitor, and direct the handling of HW by the USCG units. This will include the development and issuance of instructions, notices, and other directives as necessary to inform Maintenance and Logistics Commands (MLC), CEU, districts, and field units concerning Federal requirements and USCG policy.
- Serve as the main point of contact USCG wide concerning hazardous waste issues, violations, and overall management
- Serve as the USCG liaison with other Federal agencies (EPA, General Accounting Office, etc.) in matters relating to hazardous waste management
- Coordinate USCG's HWMM
- Interpret laws and regulations related to HW management
- Provide technical assistance as requested
- Coordinate with regulatory agencies

### **Maintenance and Logistics Commands**

The MLCs will:

- Bring the provisions of this manual to the attention of appropriate personnel
- Designate a central point of contact for all HW compliance matters within the command
- Submit a copy of related district or unit instructions to G-SEC

- Manage the overall USCG hazardous waste compliance program within their geographic area of responsibility
- Identify resource requirements to comply HW regulations within their geographic area
- Submit required reports to G-SEC-3
- Establish disposal contracts to serve unit needs for disposal and/or recycling of hazardous waste. If desirable, arrange agreement with the nearest Defense Reutilization and Marketing Office (DRMO) for the disposal of HW.

### **Area and District Commanders and Commanding Officers of Headquarters Units**

Area, District Commanders and Commanding Officers of Headquarters units will:

- Bring the provisions of this manual to the attention of appropriate personnel
- Designate a central point of contact for all HW compliance matters within the command
- Submit a copy of related district or unit instructions to G-SEC-3
- Comply with those Federal, State, and local laws and regulations applicable to the management of HW
- Identify resource requirements to comply HW regulations
- Limit mixtures of HW and non-hazardous waste and ensure proper packaging. Vessels collocated with a shore command capable of handling HW (i.e. possesses an EPA identification number) shall have a formal written agreement between the two commands. Vessels are not considered generators, however they are still responsible for segregation, identification, handling, and packaging of their HW.
- Include personnel exposed to HW in medical monitoring programs required by the USCG Medical Manual, COMDTINST M6000.1, at least for those toxic substances designated by G-WK. Area Environmental Health officers are available to assist in medical monitoring programs and other related areas.
- Require the use of personal protective equipment (PPE) where necessary. The MLC Safety and Health Manager may be contacted concerning any requirements for PPE.
- Submit required reports and manifests to EPA and/or state and local agencies
- Ensure that copies of all biennial reports (annual reports are required by many states) are submitted to Commander(s) of the cognizant MLC
- Minimize quantities of HW generated through resource recovery, recycling, source separation, and acquisition policies
- Substitute less hazardous materials in unit allowance lists and otherwise seek alternative materials that will reduce or eliminate the production of HW

- Segregate, label, package, and manifest all HW as directed within this manual

### **Civil Engineering Units**

The CEU is the primary focus of the USCG HW compliance effort. Environmental Protection Specialists (EPSs) located at these units provide guidance, training, and oversight for units within their geographic area. In support of this effort CEU will:

- Remain up to date with applicable Federal, state and local regulations
- Identify resource requirements to comply HW regulations within their geographic area
  - ◆ Acquire yearly updates of 40 CFR Parts 190 to 299 and 49 CFR Parts 100 to 177
  - ◆ Maintain current copies of applicable state regulations pertaining to the management and transportation of HW
- Provide guidance and instruction to unit managers and personnel
- Serve as a liaison between USCG and the Regional EPA Office as well as other interested state and local officials
- Serve as a liaison with MLC and Headquarters staff providing information and coordinating various actions as needed
- Coordinate the sampling and analysis of unidentified waste
- Ensure that each type of waste stream generated within the CEU is characterized and has an associated Hazardous Waste Profile Sheet (DRMS Form 1930)
- Assist generators and appropriate staff sections with the development of written training plans
- Assist units in obtaining identification numbers for generators, transporters, and storage facilities
- Ensure that contracts for work on USCG facilities address contractor responsibility for HW management
- Ensure that host/tenant agreements are in place where appropriate

### **Commanding Officers and Officers in Charge**

Commanding Officers and Officers in Charge will:

- Bring the provisions of this manual to the attention of appropriate personnel
- Designate, in writing, a central point of contact and alternate for all HW compliance matters within the command; provide copies of appointment letters to the respective CEU
- Submit a copy of related district or unit instructions to G-SEC-3

- Keep the USCG Public Affairs Staff advised of any occurrences that would/could be cause for concern with the media
- Ensure that unit personnel charged with handling HM/HW are properly trained
- Appoint a Unit/Facility Hazardous Materials and Waste Coordinator

### **Afloat Commanders**

Commanders of afloat units will:

- Appoint a Shipboard Hazardous Materials and Waste Coordinator for the proper identification and packaging of wastes turned over to the shore command
- Ensure that any afloat unit or tenant command do not leave unidentified and unmarked waste items dockside

### **Unit Hazardous Materials and Waste Coordinators**

Units throughout the Coast Guard refer to the person responsible for compliance by various titles. In addition to Unit Hazardous Material and Waste Coordinator, these titles may include environmental compliance manager, environmental coordinator, and hazardous chemical control officer. Although this manual refers to the “Unit Hazardous Materials and Waste Coordinator,” individual units may use whatever title they wish to describe this individual so long as he or she performs the duties described below. The Unit Hazardous Materials and Waste Coordinators will:

- Develop and maintain a basic understanding of state and federal HW regulations
- Develop and maintain an understanding of those unit operations which generate HW and serve as a central point of inquiry and advice for other unit personnel concerning HW management
- Identify specific waste streams generated by the unit
- Serve as a liaison between the unit and the MCL/CEU HW contacts, as well as concerned federal, state, and local representatives
- Ensure the training of those individuals involved in the handling or management of HW
- Ensure the maintenance of necessary logs, files, and other HW records including, but not limited to hazardous material storage inventory logs, HW accumulation logs, HW inventory logs, inspection checklists, and turn-in forms
- Ensure that HW manifests are completed and accompany all off-site shipments of HW, and that all transporters and designated treatment and disposal facilities are licensed to receive the waste
- Develop a tracking system for HW manifests in order to ensure that the “comeback” copies are received on time

- Develop a preparedness, prevention, and a contingency plan
- Designate temporary storage areas (including satellites) for HW generated at the facility
- Ensure that funding requests for disposal and training are submitted
- Direct disposal of wastes with the DRMO or contractor to accomplish removal of the wastes within the necessary time period
- Identify and act to the correct areas of regulatory noncompliance at the unit
- Determine the PPE required to safeguard employees during handling and use of HM.
- Monitor the work environment to ensure that conditions, acts, and practices do not compromise the personal safety of an employee
- Ensure compliance with HM management procedures
- Classify waste and identify proper descriptions to be used on labels and Uniform Hazardous Waste Manifests (herein referred to as “manifest”), and proper monitoring and labeling for each type of waste
- Prepare reports as required
- Prepare and update HW management plans and regulations in coordination with other staff sections
- Report, contain, and clean up releases of HW

### **Afloat Hazardous Materials and Waste Coordinators**

The Afloat Hazardous Materials and Waste Coordinators will:

- Ensure the proper packaging, labeling, and handling of HW
- Coordinate transfer of waste to the appropriate shore command in a responsible manner
- Assume the duties of Unit Hazardous Materials and Waste Coordinator if the vessel is independently moored

## **1.5 Using the CEU Supplements**

This Volume of the Manual (Volume I) is designed to be the core plan outlining the minimum federal HW standards. However, states may be more stringent. Volume II of this Manual (CEU Supplements) describes how the state HW management regulations differ from the minimum federal standards.

Tables 1-1 through 1-4 identify the HW topic areas where states have more stringent standards. These tables are provided to focus the reader on the applicable state requirements. In addition, throughout this Volume (Volume I), wherever a HW standard is described for

which there may be a more stringent state standard, the standard is marked with the “☞” (shows up as a pointing finger when printed) symbol. Readers should consult Tables 1-1 through 1-4 and the applicable CEU Supplement when prompted by this symbol.

Table 1-1 identifies more stringent state HW regulations for any unit/facility regardless of the HW generator status.

Table 1-2 identifies more stringent state HW regulations for Conditionally Exempt Small Quantity Generators.

Table 1-3 identifies more stringent state HW regulations for Small Quantity Generators.

Table 1-4 identifies more stringent state HW regulations for Large Quantity Generators.





State and (CEU #)	Additional HW Management Provisions (All Generators)									
	Hazardous Waste Accum. Areas	Additional Listed Hazardous Waste	Containers/ Labeling	Satellite Accum. Points	Special Wastes	Lead-Acid Batteries	Additional Reporting	Emergency Response	Universal Wastes	Used Oil
RI (3)										
SC (2)										
SD (NA)										
TN (2)										
TX (2)										
UT (4)										
VA (1)										
VT (3)										
WA (4)							☞			
WI (1)										
WV (2)										
WY (NA)										

**Table 1-2. More Stringent State Conditionally Exempt Small Quantity Generator (CESQG) Regulations**

State and Related CEU #	CESQG Provision										
	No Provision	Different Name	Accumulation Qty	Accumulation Time	Biennial Report	Contingency Plan	HW Manifest/LDNF	ID No./ Notification	Inspections /Labeling	Record-keeping	Training
AK (5)											
AL (2)								☞			
AR (2)					☞		☞	☞			
AZ (4)											
CA (4)											
CO (4)											
CT (3)											
DE (1)											
FL (2)											
GA (2)											
HI (6)											
IA (2)											
ID (4)											
IL (1)							☞				
IN (1)											
KS (NA)											
KT (2)											
LA (2)								☞			















