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NSWC CRANE
5090.3a

DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5001

5090 IN REPLY REFER TO:
Ser 095/U5189

3 JUL 1995

U.S. Environmental Protection Agency, Region V
Region V Waste Management Division
Attn: Ms. Carol Witt-Smith (HRP-8J)
77 West Jackson Blvd.
Chicago, IL 60604

Dear Ms. Witt-Smith:

Crane Division, Naval Surface Warfare Center (NAVSURFWARCENDIV Crane) submits two copies of the Revision B Waste Management Plan for Interim Measures Cleanup activities. This plan replaces Revision A found in the General Project Plans. Enclosure (2) is the required certification statement.

NAVSURFWARCENDIV Crane point of contact is Mr. Thomas J. Brent, Code 09510, telephone 812-854-6160.

Sincerely,

L. A. LAWS
Director, Public Works Directorate
By direction of the Commander,

Encl:

- (1) Revision B Waste Management Plan for Interim Measures Cleanup
- (2) Certification Statement

Copy to: (w/o encls)
SOUTHNAVFACENGCOM, (Code 1864)
COMNAVSEASYS COM (SEA 07E)
MK (Tom Payne)

WASTE MANAGEMENT PLAN

FOR

INTERIM MEASURES CLEANUP

**NSWC CRANE
Crane, Indiana**

**CONTRACT #N62467-93-D-1106
DELIVERY ORDER #0009
STATEMENT OF WORK #0007**

**June 16, 1995
Revision B**

Prepared for:

**SOUTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
2155 EAGLE DRIVE
P. O. BOX 190010
NORTH CHARLESTON, SOUTH CAROLINA 29419-9010**

Prepared by:

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1.0 PURPOSE AND ORGANIZATION

This Waste Management Plan (WMP) provides guidance for organizing and executing the handling, temporary storage, transportation, and disposal of hazardous and nonhazardous wastes and materials for NSWC Crane. The plan outlines personnel responsibilities; personnel training requirements; the procedures for storing, classifying, packaging, labeling, marking, placarding, and tracking shipments; the procedures for completing shipping papers; and the requirements for notification, recordkeeping, and reporting of shipments.

This plan will be used in conjunction with U.S. Department of Transportation (DOT), U.S. Environmental Protection Agency (EPA), and State of Indiana Department of Environmental Management (IDEM) regulations regarding classification and transportation of hazardous wastes or materials. A list of these regulations is included in Section 6.

1.1 PERSONNEL RESPONSIBILITIES

The Project Manager will designate a Site Shipping Officer (SSO) to oversee, manage, and carry out on-site and off-site waste shipments. The SSO will be trained in accordance with DOT regulations promulgated by 49 CFR 172 Subpart H. This training will be documented and the records maintained in accordance with Section 5 of this plan.

The SSO will be responsible for assisting the NSWC Site Representative to ensure that regulated shipments are processed in accordance with the requirements of the project plans, disposal facility acceptance criteria, state regulations, and federal regulations. The NSWC Site Representative will coordinate coverage of the 24-hour emergency response telephone number (see Section 3.1). The SSO will assist the NSWC officials in the resolution of any transportation-related incidents.

The SSO will coordinate, schedule, and oversee site workers who perform waste excavation, loading, and transport services to ensure the interim storage, transportation, and disposal of hazardous and nonhazardous wastes and materials comply with federal, state, and local laws. The SSO will also oversee and recommend additional analyses, as necessary, to ensure compliance with transportation and treatment/disposal requirements.

1.2 PERSONNEL TRAINING REQUIREMENTS

The SSO must successfully complete the Hazmat training required under 49 CFR 172.704 and the 40-hour training and 8-hour supervisor course required under 29 CFR 1910.120. All personnel handling hazardous wastes and materials must successfully complete the 29 CFR 1910.120 training.

In addition, the SSO and site personnel handling hazardous wastes and materials must be enrolled in a medical surveillance program.

2.0 PROCEDURES

This section describes storage, loading, shipping, and final inspection procedures.

2.1 TEMPORARY STORAGE

The SSO will establish temporary 90-day storage areas for the containerized hazardous wastes from each Solid Waste Management Unit (SWMU). All hazardous waste containers will be marked and stored in accordance with the generator requirements in 40 CFR 262.34(a) unless other arrangements have been made with the EPA under the corrective action order or RCRA permit. The temporary hazardous waste storage areas will be lined with plastic. Storage areas for wastes with no free liquids will either be sloped to allow precipitation to drain away from the containers or the containers will be elevated to prevent contact with standing water. Storage areas for wastes with free liquids will be stored in bermed areas. The bermed area will be sized to contain the greater of either the largest container volume or 10 percent of the total stored volume. The containers within the bermed area will either be elevated to prevent contact from standing water or the area will be sloping to prevent contact with accumulated precipitation. The berm will prevent surface runoff from entering the area.

Containers stored in the temporary storage area will remain closed except during the addition of material. The SSO and the NSWC Site Representative will inspect the interim storage area weekly to verify that all containers are in good condition, are properly marked, and the containment system has not deteriorated and is functioning properly. Inspections will be documented in the field logbook. Any wastes containing PCBs will be stored in compliance with 40 CFR 761 unless other arrangements have been made with the EPA. The PCB wastes will be containerized, marked, stored, and disposed of in accordance with 40 CFR 761 Subparts C and D. The PCB temporary storage areas will be similar to the RCRA hazardous waste storage areas. In accordance with PCB regulations, a Spill Prevention Control and Countermeasure Plan will be prepared for PCB storage areas, and the containers will be stored for no more than 30 days.

When the temporary storage areas are no longer needed, each area will be closed in accordance with 40 CFR Part 265.111. At a minimum, the closure will ensure that the need for further maintenance is minimized and that the release of hazardous constituents from each area is minimized or eliminated. This will be accomplished by removing or decontaminating all residues, structures and subsoils within each area.

B

2.2 PREPARATION FOR SHIPMENT

2.2.1 Document Control

The SSO will establish a shipping information and tracking system that includes:

- Personnel training documentation.

- Subcontractor EPA identification numbers and addresses.
- Emergency and spill response information taken from the Task-Specific Site Safety and Health Plan.
- Development of a complete manifest package.
- Waste shipment log.

2.2.2 Personnel and Subcontractor Qualifications

Subcontractor and site personnel qualifications shall be reviewed to ensure personnel, waste transport, and waste disposal subcontractors are readily available and qualified. Licensing and permitting requirements for transport and disposal subcontractors will be reviewed to ensure subcontractor compliance with DOT and EPA regulations. Before waste shipment, the SSO will verify that the destination facility selected by the subcontractor is properly licensed and in compliance with its permit.

2.2.3 Waste Disposal Site Acceptance

The SSO will initiate and oversee the waste disposal site acceptance approvals for treatment and disposal of hazardous and nonhazardous wastes. Waste disposal sites will be selected by the subcontractors. Approval must be secured from the treatment or disposal site before any waste shipment is allowed to leave the work site or the interim storage area.

2.2.4 Waste Classification

Using the laboratory analyses for waste profiling, the SSO will determine the proper shipping name for all wastes in accordance with regulations established in 49 CFR 172. Additionally, the SSO will identify hazard classes, UN numbers, packing group numbers, applicable Reportable Quantity (RQ) requirements, and DOT packaging instructions (refer to 49 CFR 172.101, Hazardous Materials Table) for all hazardous material shipments. The NSWC Site Representative and the SSO will review the designations for concurrence or to identify discrepancies.

2.2.5 Waste Screening and Decontamination

The SSO will be familiar with and oversee waste field screening methods that use field instruments and portable test kits to ensure that wastes shipped to off-site or on-site waste disposal facilities comply with their respective waste acceptance criteria. Personnel and equipment decontamination procedures must be reviewed to determine if procedures are adequate to prevent contaminating areas outside the work site. In addition, the SSO will ensure site access is controlled during and after work hours.

2.2.6 Shipping Papers

Shipping papers with the emergency response information requirements, including the 24-hour emergency response telephone number, will be prepared in accordance with 49 CFR 172 Subpart

C. The appropriate hazard guide is selected from the DOT Emergency Response Guidebook and attached with the analytical data on the shipment.

Shipping Number. A unique shipment number from the project Waste Shipment Log will be assigned to each truck. This unique shipment number indicates waste type identification, UN identification number, weight, truck, date the waste was placed in the truck, departure date, destination, applicable RQ requirements, and the appropriate hazard guide number selected from the DOT Emergency Response Guidebook.

Bill of Lading. A bill of lading (for example, shipping manifest and weigh bills) will be completed for all shipments—both hazardous and nonhazardous. The bill of lading includes all information required under 49 CFR 172. Subpart C, and specific site requirements.

Manifest. The manifest package will consist of, at a minimum, a bill of lading, the hazardous waste manifest, the waste profile sheets, material or waste safety data sheets, and/or the land disposal restriction notification and certification forms. The complete package shall be in full compliance with all applicable federal, state, and local laws and regulations including, but not limited to, 329 IAC 3.1-7-3 through 329 IAC 3.1-7-13, 40 CFR 262 Appendix (Uniform Hazardous Waste Manifest and Instructions), and 40 CFR 761 (for PCB shipments).

The SSO will prepare the manifest package that will include:

- A completed bill of lading describing the name and address of the shipper and consignee, the waste's proper shipping name, hazard class, the UN numbers, packing group number, applicable RQ requirements, and the 24-hour emergency contact phone number.
- The completed EPA hazardous waste or PCB manifest for off-site hazardous waste shipments. Information is similar to the bill of lading or shipping manifest. Manifests shall be signed or certified by the NSWC Site Representative only.
- A completed Waste Safety Data Sheet (WSDS) and/or hazard guide selected from DOT's Emergency Response Guidebook.
- The disposal site's approved waste profile.
- A completed land disposal restriction notification and certification form. The land disposal restrictions (LDRs) require notification of the treatment and disposal facility for all restricted hazardous wastes. The SSO will decide if the shipment will include LDR-restricted wastes and decide the type of treatment required. The notice must include the EPA hazardous waste number, corresponding treatment standards, manifest number, and waste analysis data as itemized in 40 CFR 268.7.

The SSO will review the completed manifest package or shipping document and submit these documents to the NSWC Site Representative for approval.

Submittals. For each waste shipment, the SSO shall submit the following to the NSWC Site Representative for review:

- Hazardous waste or PCB manifests.
- Waste Safety Data Sheets (WSDS).
- Land disposal restriction notification and certification forms.
- All other supporting documentation for a complete package.

Supporting documentation shall include waste disposal history, all analytical results, available MSDSs, and any other information received and used to identify the proper waste code.

Before submittal of the complete package, a one-page evaluation and decision logic justification for each waste code determination shall be presented to the Contracting Officer for each Delivery Order.

Signatures. The NSWC Site Representative shall be responsible for certifying and signing all manifests and associated disposal paperwork on behalf of the Navy.

Designation of Generator. The generator and signer of Hazardous Waste or PCB Manifests, Waste Profile Sheets, and Land Disposal Restriction Notifications and Certifications shall be identified by the NSWC Site Representative before conducting field work. The SSO shall submit the executed manifest package, along with the above information and the quantities shipped, as an appendix to the final report covering field activities.

2.3 REQUIREMENTS DURING LOADING

The SSO will assist the NSWC Site Representative in ensuring that all trucks are properly licensed and permitted to transport the waste to the selected disposal site. A DOT Hazardous Materials Registration must be provided by the transporter and accompany each hazardous material shipment.

No vehicle shall be allowed to leave the site without first being decontaminated and declared clean.

The SSO and the NSWC Site Representative will inspect carriers to ensure that trucks have overall adequate protection to prevent leakage, spillage, or fugitive dust on highways during shipment.

2.4 FINAL INSPECTION

The SSO and the NSWC Site Representative will conduct the final inspection at the weighing area where the off-site transporter will begin highway transport to the disposal facility. At a minimum, the SSO and the NSWC Site Representative will check the packaging and placarding, and review the manifest and bill of lading.

Preliminary and Final inspection checklists are included in Appendix A.

3.0 NOTIFICATION REQUIREMENTS

3.1 DOT NOTIFICATIONS

In accordance with DOT regulations, the NSWC Site Representative will provide a 24-hour telephone number to contact for all hazardous material shipments.

3.2 EMERGENCY NOTIFICATIONS

All emergencies on the project site will be managed by the NSWC Site Representative in accordance with the Task-Specific Site Safety and Health Plan.

4.0 DISPOSAL SITES

The subcontractor will be responsible for selecting an off-site disposal site for hazardous materials. The on-site landfill will be used for the disposal of nonhazardous waste.

5.0 REPORTING AND RECORDKEEPING REQUIREMENTS

5.1 REPORTS

5.1.1 Records Inventory and Disposal Schedule

The SSO will assist with tracking and documenting receipt of all off-site shipments to the disposal facility.

5.1.2 Shipment Reports

For hazardous and PCB waste sent off site for disposal, the SSO shall provide the NSWC Site Representative with the following:

1. The complete manifest package for certification of the manifest and associated disposal documents that the packaging, marking, labeling, storage, and disposal of waste have been accomplished as required by federal, state, and local laws and regulations.
2. Location, name, and identification of the off-site facility and written verification of the status of the facility permit and operating conditions.
3. Certification of disposal for individual delivery orders requiring packaging, handling, transportation, treatment, or disposal of hazardous wastes or hazardous materials shall be tracked in accordance with the manifest requirements. Nonhazardous wastes shall also be tracked as stated above.

5.2 RECORDKEEPING

5.2.1 Training Documentation

Hazmat Training. The Site Shipping Officer will maintain the following records:

- Hazmat employee's name.
- Most recent training completion date.
- Description of the training.
- Instructor's name and address.
- Certification that the Hazmat employee has been trained and tested.

Hazardous Waste Operations and Emergency Response. The Site Safety and Health Officer will maintain records of certification for completion of the Hazardous Waste Operations and Emergency Response (29 CFR 1910.120) training.

5.2.2 Recordkeeping

Manifests. The SSO will assist the NSWC Site Representative to ensure that one copy of the manifest, all supporting documentation (including waste analyses), required reports, and records are maintained. The manifests will be maintained in accordance with applicable RCRA permit and corrective action order, 40 CFR 761 regulations, and IDEM requirements.

6.0 REFERENCES

- Indiana Department of Environmental Management. *Identification and Listing of Hazardous Waste*. 329 IAC 3.1-6.
- Indiana Department of Environmental Management. *Standards Applicable to Generators of Hazardous Waste*. 329 IAC 3.1-7.
- Indiana Department of Environmental Management. *Final Permit Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities*. 329 IAC 3.1-9.
- Indiana Department of Environmental Management. *PCB Waste Management*. 329 IAC 4-1.
- U. S. Department of Transportation.
Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements. 49 CFR 172.
General Requirements for Shipments and Packaging. 49 CFR 173.
- U.S. Department of Transportation; Research and Special Programs Administration. *Emergency Response Guidebook*, RSPA P5800.6.
- U.S. Environmental Protection Agency. *Hazardous Waste Management System: General*. 40 CFR 260.
- U.S. Environmental Protection Agency. *Identification and Listing of Hazardous Waste*. 40 CFR 261.
- U.S. Environmental Protection Agency. *Standards Applicable to Generators of Hazardous Waste*. 40 CFR 262.
- U.S. Environmental Protection Agency. *Land Disposal Restrictions*. 40 CFR 268.
- U.S. Environmental Protection Agency. *Polychlorinated Biphenyls (PCBs): Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*. 40 CFR 761.

APPENDIX A
INSPECTION CHECKLIST

TRANSPORT INSPECTION CHECKLIST

PRELIMINARY INSPECTION:

Check Shipping Papers

- _____ Do the papers contain the proper shipping name from 49 CFR 172.101?
- _____ Do the papers have the proper hazard class?
- _____ Is the proper UN ID number included?
- _____ Are the proper packing groups being used?
- _____ Is the total quantity listed?

Check Packaging (if applicable)

- _____ Are they free of leaks or major damage?
- _____ Are the overpacks or consolidated packages compatible?

Check Labeling (if applicable)

- _____ Do the labels agree with shipping paper hazard class?
- _____ Are the labels clearly visible?
- _____ Are there any required labels missing?

Checking Marking (if applicable)

- _____ Do the markings agree with the bill of lading?
- _____ Are the markings legible and spelled correctly?
- _____ Are there any required markings missing?

Check Loading

- _____ Are all materials compatible?
- _____ Are the packages properly braced?
- _____ Are there any protrusions in the vehicle that could damage the freight?
- _____ Is the count number correct?

Check Placards

- _____ Are all classes of placards on all four sides of vehicle?
- _____ Are the UN ID numbers displayed, if necessary?
- _____ Are the placards visible, legible, and securely attached?

FINAL INSPECTION:

Check Shipping Papers

- _____ Are they complete and correct?
- _____ No abbreviations are being used?
- _____ Are there any additional descriptions needed?
- _____ Are the total quantities listed?
- _____ Is the emergency response information included?

Check Packaging (if applicable and accessible)

- _____ Is the packaging the proper container?
- _____ Are the packages damaged?
- _____ Are there any actual or imminent leaks observed?

Check Loading

- _____ Are the orientation arrows upward, if marked?
- _____ Is the load properly blocked and braced?
- _____ The load has no prohibited combinations?

Check Marking and Labeling (if applicable and accessible)

- _____ Do the labels agree with shipping papers?
- _____ Do the markings agree with shipping papers (shipping name and UN ID number)?
- _____ Are all labels or markings in place?
- _____ Is the UN ID number correct on vehicle, if required?

Check Placarding

- _____ Are the correct placards on the vehicle?
- _____ Are the placards securely attached?
- _____ Are the placards properly displayed on all four sides?
- _____ Are the placards clean and unobstructed?

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

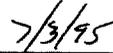


SIGNATURE



TITLE

L. A. LAWS
Director, Public Works Directorate
By direction of the Commander



DATE



DEPARTMENT OF THE NAVY
CRANE DIVISION
NAVAL SURFACE WARFARE CENTER
300 HIGHWAY 361
CRANE, INDIANA 47522-5001

IN REPLY REFER TO:
5090
Ser 095/U5190

3 JUL 1995

Brian Von Gunten
Indiana Department of Environmental Management
Defense Environmental Restoration Program
100 N. Senate, P.O. Box 6015 (Room N-1255)
Indianapolis, IN 46206-6015

Dear Mr. Von Gunten:

Enclosure (1) contains the Revision B Waste Management Plan for Interim Measures Cleanup activities. This plan replaces Revision A found in the General Project Plans.

NAVSURFWARCENDIV Crane point of contact is Mr. Thomas J. Brent, Code 09510, telephone 812-854-6160.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. A. Laws".

L. A. LAWS
Director, Public Works Directorate
By direction of the Commander

Encl:

(1) Revision B Waste Management Plan for Interim Measures Cleanup

Copy to: (w/o encl)
SOUTHNAVFACENGCOM, (Code 1864)