

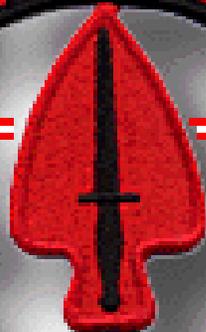
AIRBORNE

Welcome
to the

101st Airborne Division (Air Assault)



AIRBORNE



AIRBORNE



and Fort Campbell, Ky.



**Environmental Division's
Satellite Accumulation Point
Operations Course
Instructor: Allen Gilbert**

798-9763

Satellite Accumulation Point Operations



Supporting Readiness

- ➔ Responsible management of environmental resources
- ➔ Enhancing the well being of soldiers and their families
- ➔ Active partnerships with federal agencies, regulators, states, and communities
- ➔ Delivering innovative technologies and solutions to environmental challenges
- ➔ Integrating environmental stewardship into The Army mission
- ➔ Natural, realistic ranges and sites that sustain training
- ➔ Evolving to support The Army of the next century
- ➔ Sound strategies for pollution prevention, conservation, compliance and cleanup
- ➔ Sharing knowledge of successful environmental initiatives

PERSONNEL

- **Bill Baggett (Hazardous Waste Manager)** 798-9786
- **Allen Gilbert (Compliance)** 798-9763
- **Inspectors (SD)** 798-9105
- **Building 2186**

Satellite Accumulation Point Operations



- Environmental Division's responsibility
- Develop and implement an overall SAP management program to ensure compliance with Federal, State, and Fort Campbell hazardous waste regulations.
- Provide training, guidance, and assistance to units, directorates, and tenants EQO's on proper SAP management.
- Inspect all sites on a monthly basis (Unannounced)

Satellite Accumulation Point Operations



Unit/activities responsibilities

Ultimately the responsibility is the Commander's.

- Assure all SAP operators are trained by the Environmental Division.
- To ensure regulatory compliance.
- Weekly inspection of your sites.



Current Statistics

- 148 approved SAP's.
- 117 approved Used-POL sites.
- * Fort Campbell is a prime target location for regulators due to the large amount of sites (265) for them to inspect.
- * The number one RCRA violation found is open containers.
- * RCRA violations start at \$27,500.00 per violation, per day.



Satellite Accumulation Point Operations

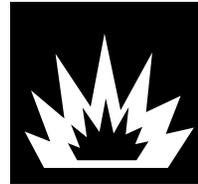
Hazardous Waste: Must be a solid waste, listed in Subpart D of 40 CFR Part 261. Must be mixed with a listed waste or exhibit at least one characteristic in Subpart C of 40 CFR Part 261.



Ignitable



Corrosive



Reactive



Toxic

Universal Waste: Common hazardous wastes such as batteries, recalled or discontinued pesticides, mercury thermostats (ampoules), and mercury containing bulbs or lamps that are generated, stored, and eventually recycled or reclaimed off-site.

How much can be accumulated?

You may accumulate up to 55 gallons of hazardous per SAP and (or) universal waste or 1 quart of acute toxic waste for up to 6 months



Satellite Accumulation Point Operations

Satellite Accumulation Points: (SAP's) are remote locations where waste is being generated at, or near the point of generation. SAP's are volume driven and not regulated by time during storage of the hazardous waste that is being accumulated.

- **90-Day Accumulation Point:** Storage areas are time driven and do not regulated by the volume of hazardous waste stored. A specific hazardous/universal waste that is being accumulated must be disposed of within 90 days. The Environmental Division's PPOC is the only authorized 90-day site on Fort Campbell.





Satellite Accumulation Point

Operations

Correct Labeling and Marking

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.
IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:
NAME HQ, 101 AIRBORNE (AIR ASSAULT) DIV
ADDRESS BLDG. 5212 OREGON AVE. PHONE 502-798-4740
CITY FT. CAMPBELL STATE KY ZIP 42223
EPA ID NO. / MANIFEST DOCUMENT NO. TN5210020140 /
ACCUMULATION START DATE _____ EPA WASTE NO. D001

Paint thinner

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WMMP
Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800) 521-0808

Hazardous Waste Label

Universal Waste Label

UNIVERSAL WASTE

CONTENTS _____

ACCUMULATION START DATE _____

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____



WRITTEN



Satellite Accumulation Point Operations

INSPECTION PROGRAM

What are we looking for?

1. Containers

- Condition of container. (From the PPOC)
- Container must be closed at all times except when adding or removing wastes. Container must be labeled or written properly with “Universal Waste or Hazardous-Waste” by PPOC technicians or SAP inspectors only...
- Full hazardous waste containers must have a piece of tape on top of the container with the date it was filled. Initiate the waste turn-in log and call the PPOC to schedule the pick-up or turn-in.
- Accumulation start dates only on designated SAP’s accumulating fluorescent tubes.





Satellite Accumulation Point Operations

Schedule turn-in or drop-off appointment
for Hazardous/Universal Wastes
and for Used POL

798-9790





Satellite Accumulation Point Operations

2. Accumulation

- Are like wastes stored together (No mixing; proper segregation)?
- Storage area must be marked “Satellite Accumulation Point”
- Is the poster (steps for easy compliance) posted.
- Is a fire-extinguisher located in proximity to the SAP?
 - Is it the right type?
 - Is it charged?
 - Is the inspection tag up-to-date?

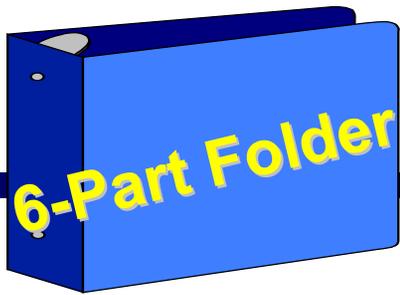
Satellite Accumulation Point Operation Procedures For Easy Compliance

Hazardous Waste	Universal Waste
1. Accumulation: no more than 55 gallons of hazardous/ universal waste or only 1 quart of acute toxic waste.	1. Accumulation: no more than 55 gallons of hazardous/ universal waste or only 1 quart of acute toxic waste.
2. Container closed: tightly except when adding or removing waste.	2. Container closed: tightly except when adding or removing waste.
3. Keep container clean	3. Keep container clean
4. Check label: contents are identified and no start dates.	4. Check label: contents are identified and no start dates.
5. Fill date: when container becomes full.	5. Fill date: when container becomes full.
6. Call for pick-up: prepare DD Form 1348-1A if required and fill out the WBC Waste Turn-in Log and get stamped for receipt of turn in.	6. Call for pick-up: prepare DD Form 1348-1A if required and fill out the WBC Waste Turn-in Log and get stamped for receipt of turn in.
7. File a copy: of the inspection sheets(Internal and External), FWBC Waste Turn-in Log and all copies of DD Form 1348-1As if required.	7. File a copy: of the inspection sheets(Internal and External), FWBC Waste Turn-in Log and all copies of DD Form 1348-1As if required.

Appointed EQO: _____ Phone: _____

EMERGENCY=911
For Pick-up or Pumping Call =798-9790

Satellite Accumulation Point Operations



3. Paperwork: 6-Part Folder (Look at example pamphlet)

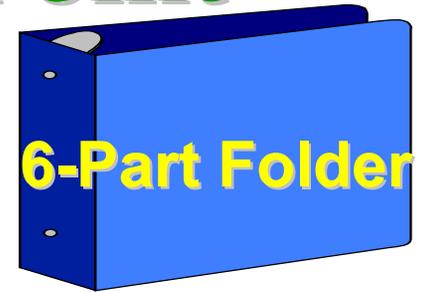
- Is the six-part folder complete and up-to-date?
- Part I: Request/Approval Letter (Updated Annually) / Site Specific Sketch / Training Certificates (**Training Updated annually**) or temporary training rosters
EQO's training certificate.
Operator's training certificate.

Part II: List waste streams and any hazardous materials within your site.

Part III: MSDS's--For approved waste streams.
(Binder memo if large quantities.)



Satellite Accumulation Point Operations



3. Paperwork 6-Part Folder - CONTINUED

Part IV: Waste Profiles if needed/Example DD1348-

1A's if your unit/activity is required to by the PPOC.

Part V: Copies of all inspections (internal & external)
kept on file for 3 years

Part VI: Waste turn-in log is filled out correctly and all
waste streams have been turned no longer than 6
months. All copy 4 of DD1348-1A's
from all turn ins on file up to 3 years.

NOTE: All completed inspections, waste turn-in logs
and copy 4's (DD1348-1A) must be filed for 3 years.
Memo for location of where being filed.



Satellite Accumulation Point Operations

Who needs does and who doesn't???

Need to generate DD form 1348-1A's

Military units: MEDDAC/DENTAC-BACH, veterinarian, and all dental clinics.

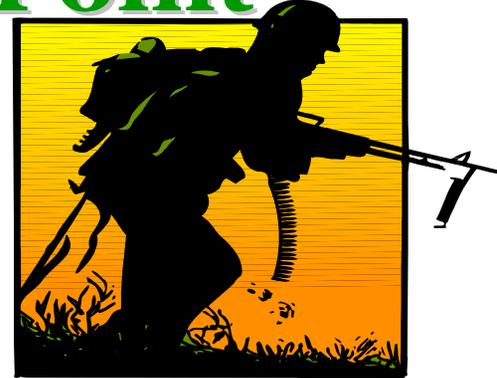
Government Services: ALMD, ESRA, IMO, and ITO.

Contractors: DYNCORP, J&J Maintenance, and any other outside contractor.

**** There may be special occasions when it may be requested for any unit or activity to provide a DD form 1348-1A.**



Satellite Accumulation Point Operations



Deployment Closure Procedures

Any deployment exceeding 10 days in length must be reported to the Environmental Division by submitting a memorandum at least 7 days prior to deployment or sooner.

- 1) Memorandum must state unit, location (building number), waste streams currently being accumulated, date of departure (we do not want to know where you are deploying) and estimated time of arrival.
- 2) Once memorandum is received, your unit will be given a priority status to turn-in all waste on-site following routine turn-in procedures.
- 3) After all waste has been turned in, the SAP will be put in an inactive status. No waste can be accumulated.
- 4) Upon arrival back to Fort Campbell, a call can be made to reactivate your SAP. If this call is not made then your SAP will still be in an inactive status.

Satellite Accumulation Point Operations



UNIVERSAL WASTE

CONTENTS: 8 alkaline batteries

ACCUMULATION START DATE: BY JAN 00

SHIPPER: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

Only Authorized Locations
Troop Self-Help
Housing Maintenance
BACH
AAFES
Fort Campbell Schools
PPOC

These locations will put the accumulation start date on the containers once the first tube is put in the accumulation container.





Satellite Accumulation Point Operations What's wrong ?





Satellite Accumulation Point Operations Mishandling/Improper Disposal of hazardous materials and hazardous wastes

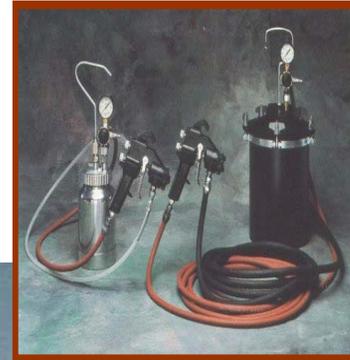


Who are you going to call???
If you find it in a dumpster or in the training area.
Rick Hale 798-9789

Waste Minimization

Executive Order

Product substitution
Inventory control
Recycling
Process change
Better management





Used Oil (POL) Accumulation

Used oil is a recyclable waste

All Used POL and Recyclable Fuel containers must be metal drums.

What can be accumulated in the Used Oil container?

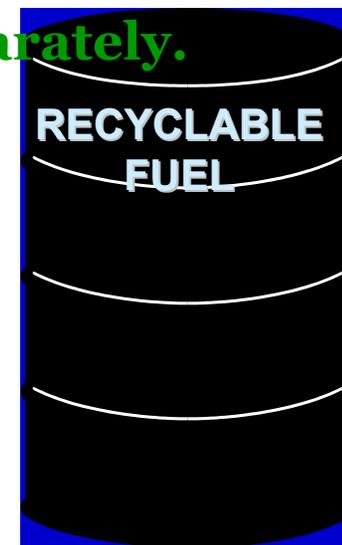
Motor oils, Diesel fuel, Kerosene, JP-8, Transmission fluid, Hydraulic fluid, Brake fluid, Heating oil and Synthetic oil.

*** All can be accumulated in the same container***

Mogas and unleaded fuels can not be accumulated with the used oil but may be accumulated separately.



When you mix anything other than the approved items with Used POL, you are turning a recyclable material into a hazardous waste.





Used Oil (POL) Accumulation

- All metal containers must be grounded.
- All accumulation drums must be metal except for Antifreeze.
- EQO's must train all personnel handling POL products.

Do the right thing, keep in compliance and protect the Environment

Used POL and Used Antifreeze Accumulation Points Procedures

Appointed EQO: _____ Phone: _____

Used Oil Accumulation	Recyclable Fuel Accumulation	Used Antifreeze Accumulation
Proper labeling "Used Oil"	Proper labeling "Recyclable Fuel"	Proper labeling "Used Antifreeze"
Keep Closed Unless Adding or Removing	Keep Closed Unless Adding or Removing	Keep Closed Unless Adding or Removing
Keep Clean	Keep Clean	Keep Clean
Grounded Metal Flammable Containers	Grounded Metal Flammable Containers	Secondary Containment Unit Liquids Only and Must be Labeled Same as Drum
Secondary Containment Unit Liquids Only and Must be Labeled Same as Drum	Secondary Containment Unit Liquids Only and Must be Labeled Same as Drum	Inspect Weekly
Inspect Weekly	Inspect Weekly	Inspect Weekly

Emergency=911 For Pick-up or Pumping Call =798-9790



USED OIL

**RECYCLABLE
FUEL**

No Smoking Within 50'

ENVIRONMENTAL LIABILITY

BEFORE.....

Prior to 1996, Fort Campbell Received NOV's for Improper Hazardous Material Management.



\$27,500 Per-Container, Per-Day, Fine Potential

ENVIRONMENTAL LIABILITY

.....AFTER THE PPOC

