USAG STUTTGART

HAZARDOUS WASTE MANAGEMENT PLAN

(HWMP)

- - - FINAL - - -

Update February 2024

APPROVALS

This hazardous waste management plan (HWMP) satisfies the requirement contained in Chapter 10-1. Hazardous Waste of the Army Regulation 200-1 (Dec 2007), to develop and implement a HWMP that includes, at a minimum, written procedures for all aspects of hazardous waste (HW) management, to include the identification, storage and transporting of HW, training of personnel, tracking manifests and maintaining required records. Furthermore, this HWMP satisfies the requirement to develop and maintain a Closure Plan contained in Section C6.3.3.11.2 and a Waste Analysis Plan in Section C6.3.3.3.1 of Chapter 6, Hazardous Waste, of the German Final Governing Standards (GFGS).

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HAZARDOUS WASTE MANAGEMENT PLAN

RECORD OF REVISIONS

This HWMP must be reviewed annually and updated at least once every five years. The following table is provided for tracking revisions to this plan.

Revision No.	Date	Description	Pages Affected
1	Jan 2016	DPW-ED staff revision	Approvals, Page 1-2, Page 4, A1-1, A1-2, A4-1, A4-2, A6-1, A9-1, A9-2, Appendix 10,
2	Feb 2018	DPW-ED staff revision	Approvals, Page 4, A9-2
3	December 2020	HWMP update by Wood with approval thru DPW-ED staff	Entire document
4	February 2022	DPW-ED staff revision	Approvals, Pages: 1-1,2-2,9-1,2,10-1,2
5	February 2024	HWMP update by Tetra Tech with approval of DPW-ED staff	Approvals, Page 3-5, 5-1, 6-2, 7-2, 9-1, A1-1, A1-2, A1-4, A1-5, A1-9, A5-5 A7-1, A7-2
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ACRONYMS

AER	Army in Europe Regulation
ADR	European Agreement Concerning the International Carriage of Dangerous Goods by Road
AR	Army Regulation
ASF	*Abfallsammelbehälter für flüssige Sonderabfälle* (waste collection container for liquid hazardous wastes)
AST	Aboveground storage tank
AwSV	*Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen* (German Ordinance on installations for handling substances hazardous to water)
CFR	Code of Federal Regulations
COR	Contracting Officer Representative
DLA	Defense Logistics Agency
DoD	Department of Defense
DPW	Directorate of Public Works
ED	Environmental Division
EO	Environmental Officer
EPAAS	Environmental Performance Assessment and Assistance System
GFGS	Final Governing Standards for Germany
HAZCOM	Hazard Communication
HM	Hazardous Material
HW	Hazardous Waste
HWBAT	Container for collection of household batteries
HWCON	Container for collection of cooking oil
HWAP	Hazardous Waste Accumulation Point
HWMP	Hazardous Waste Management Plan
HWPS	Hazardous Waste Profile Sheet
HWSA	Hazardous Waste Storage Area
IMCOM-E	Installation Management Command - Europe
IBC	Intermediate Bulk Container
LGK	*Lagerklasse* (storage class)
O&M	Operation and Maintenance
OEBGD	Overseas Environmental Baseline Guidance Document
OSHA	Occupational Safety and Health Administration
PPE	Personal Protective Equipment
POC	Point of Contact
POL	Petroleum, Oil and Lubricants

SDS	Safety Data Sheet
SOP	Standard Operation Procedure
SPRP	Spill Prevention and Response Plan
SWMP	Solid Waste Management Plan
TRGS	*Technische Regeln für Gefahrstoffe* (Technical Rules for Hazardous Substances*)*
U.S.	United States
USAG	United States Army Garrison
UST	Underground storage tank

1. INTRODUCTION

This HWMP has been developed for current and planned hazardous waste (HW) generation and disposal activities. The Directorate of Public Works (DPW) Environmental Division (ED) is responsible for development, maintenance, and implementation of this HWMP.

Throughout this HWMP, all subsequent citations from the German Final Governing Standards (from September 2020) are simply referred to as the "GFGS". In addition, it should be noted that the nomenclature for GFGS section numbers includes a reference to both the GFGS chapter and paragraph (e.g., GFGS, Ch. C6.2.2. refers to Chapter 6, Paragraph 6.2.2). In addition, references to the German Ordinance on installations for handling substances hazardous to water (AwSV - *Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen*) will be referenced as applicable. Short excerpts of the most relevant paragraphs of the AwSV are presented in Appendix 3. This Ordinance came into force in Germany in August 2017 and the requirements will be implemented in the GFGS with the next update (expected in November / December 2020)

The purpose of a HWMP is to outline policies and procedures for proper handling, storage, and disposal of HW. Chapter 6 of the GFGS contains cross-references to Chapter 5, Hazardous Materials (HM), and Chapter 7, Solid Waste.

The HWMP should be used in combination with the Garrison's Solid Waste Management Plan (SWMP) for effective overall management of waste generated. The SWMP is managed by the Operation and Maintenance (O&M) Division.

Regular inspections of Hazardous Waste Accumulation Points (HWAPs), containers for collection of household batteries (HWBATs), containers for collection of cooking oil (HWCONs), Hazardous Waste Storage Areas (HWSAs), and tank systems storing HW, must be performed to assess compliance with the provisions of this HWMP. The sample compliance plan table in Appendix 8 may be used to facilitate this process.

Table 1-1 HWMP Regulatory Cross Reference Matrix

Hazardous Waste Management Plan (HWMP)			
German FGS Chapter	**Description**	**Applicable Section of HWMP**	**Remarks**
C6.3.1.	Hazardous Waste Generators	7.1	
C6.3.2	HWAPs	3.3	
C6.3.2.5	Personnel Training for Managing HWAPs	4	
C6.3.3	HWSA	3.4	
C6.3.3.11	Closure and Closure Plans for HWSA	3.4.3/ Appendix 4	
C6.3.4	Container Handling and Storage	3.1	
C6.3.4.4	Special Requirements for Incompatible Wastes	Appendix 6	

Hazardous Waste Management Plan (HWMP)			
German FGS Chapter	**Description**	**Applicable Section of HWMP**	**Remarks**
C6.3.5	Recordkeeping Requirements	7	
C6.3.6	Contingency Plan	8	
C6.3.7	Tank Systems	3.5 & 3.6	
C6.3.8	Management of Used Oil and Batteries	3.2 & 3.7	
C6.3.10	Hazardous Waste Training	4/ Appendix 7	
C6.3.11	Hazardous Waste Disposal	6	
C6.3.12	Permitted Transportation and Disposal Companies	5	
C6.3.13	Appointment and Responsibilities of Waste Management Officer	2.1	
C6.3.16	Daily Removal of Hazardous Waste to HWAP or HWSA	3.3	

2. KEY PERSONNEL

2.1 WASTE MANAGEMENT OFFICER (BETRIEBSBEAUFTRAGTER FÜR ABFALL)

The United States Army Garrison (USAG) Stuttgart has appointed Ms. Therese Mundorff as the primary Hazardous Waste Manager *(Betriebsbeauftragte für Abfall).* The activities defined in the host nation laws that require a Waste Management Officer (according to GFGS C6.3.14) are applicable for the Garrison with regards to HW storage facility and hospital and/or clinic (see Table 2-1).

Table 2-1 Hazardous Waste Activities that require a Waste Management Officer

Hazardous Waste Activity	Yes	No
Hazardous waste storage facility	x	
Hazardous waste disposal facility		x
Landfill		x
Incinerator		x
Hospital and/or clinic	x	
Plant for chemical or physical treatment of hazardous waste with a throughput of more than 0.5 metric tons (500 kg) per hour		x

Table 2-2 Key Personnel

Position/Task	Unit/ Activity	Name	DSN Phone	E-mail Address
Garrison Hazardous Waste Manager	DPW-ED	Prim.: Therese Mundorff Alt.: Simone Leiss-Wenzel	 596-6135 596-6134	 therese.mundorff.ln@army.mil simone.leiss-wenzel.ln@army.mil
Point of Contact (POC) for HW Training	DPW-ED	Therese Mundorff	596-6135	therese.mundorff.ln@army.mil
HWSA Manager Management of HW disposal contracts Maintenance/update of disposal documentation	DPW-ED	Therese Mundorff	596-6135	therese.mundorff.ln@army.mil
Maintenance of Training Documents	Generating unit	Unit EO/ Training Officer	Unit POC	Unit POC
Maintenance of Hazardous Waste Audit Trail Documents	Generating unit	Unit EO/ Unit POC for HW	Unit POC	Unit POC

3. STORAGE AND ACCUMULATION

The USAG Stuttgart currently operates 22 HWAPs, 22 HWBATs, 6 HWCONs, one HWSA, and 10 Waste Oil Tanks. The DPW ED personnel are primarily responsible for the overall setup and maintenance of the HWAPs and the HWSA. Individual appointed Unit Environmental Officers (EO) and Environmental Representatives of activities are responsible for assisting in the HW management at the workforce level. Appendix 1 contains a list of the active HWAPs, HWBATs, HWCONs, the HWSA and the Waste Oil Tanks and the associated units/activities.

3.1 CONTAINERS (INCL. HWCONS)

Container requirements apply to both the general storage practices and container labeling. The following container requirements are to be followed at the USAG Stuttgart. (GFGS, Ch. C6.3.4.)

- All containers used to collect HW at HWAPs and the HWSA must be approved in accordance with The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).
- Containers holding HW must be in good condition and free from severe rusting, bulging, or structural defects (GFGS, Ch. C6.3.4.1.1.).
- Containers used to store HW, including overpack containers, must be compatible with the materials stored (GFGS, Ch. C6.3.4.1.2.).
- A container holding HW must always be closed during storage, except when it is necessary to add waste (GFGS, Ch. C6.3.4.1.3.1.).
- A container holding HW must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak (GFGS, Ch. C6.3.4.1.3.2.).
- Containers of flammable liquids must be electrically grounded when transferring flammable liquids from one container to the other (GFGS, Ch. C6.3.4.1.3.3.).
- Containers holding HW must be marked with a HW marking and a label indicating the hazards of the waste contained therein (flammable, corrosive, etc.), as appropriate (GFGS, Ch. C6.3.4.1.4.).
- Areas where containers are stored must be inspected weekly for leaking and deteriorating containers, as well as deterioration of the containment system caused by corrosion or other factors. Secondary containment systems must be inspected for defects and emptied of accumulated releases or retained stormwater (GFGS, Ch. C6.3.4.1.5.).
- All hazardous waste containers must have appropriate labels indicating the waste stream, and other required information. Example labels are provided in Appendix 2.
- Areas that store containers holding ignitable or reactive wastes must be located at least 15 meters (50 feet) inside the installation's boundary.
- Incompatible wastes (see Appendix 6) must be stored in segregated containers and must not share secondary containment structures. Where necessary, incompatible wastes must be physically separated using berms, dikes, walls, or other similar means.
- Containers are property of a contractor firm and must be handled in an orderly manner and only used for storing the designated waste streams.
- Secondary containment systems must be compatible to the accumulated waste and must be impervious to contain leaks or spills. Rainwater captured in containments must be inspected before release.

Locations of the containers placed for collection of cooking oil (HWCONs) are presented in Appendix 1. HWCONs must fulfill the general requirements of HW containers listed above.

3.2 HAZARDOUS WASTE BATTERIES (INCL. HWBATS)

Storage of used batteries shall only be conducted at sites with impervious surfaces and appropriate weatherproofed cover or in appropriate containers. This also applies if used batteries are stored only temporarily. Lead-acid batteries, nickel-cadmium batteries and batteries containing mercury must be managed as HW, regardless of whether they are to be recycled or disposed of permanently. The layers of lead-acid batteries and other car batteries in the container should be separated by using cardboard paper. The poles of lithium batteries should be taped to avoid contacts with each other.

Locations of the containers placed for collection of household batteries (HWBATs) are listed in Appendix 1. HWBATs must fulfill the general requirements of HW containers listed under Section 3.1 of this HWMP.

3.3 HWAP

A HWAP is defined as a location where HWs are accumulated until removed to a HWSA or transported for treatment or disposal. A HWAP is used to accumulate ≤ 208 liters (≤ 55 gallons) of HW per waste stream, or 1 liter (1 quart) of acute HW per each waste stream (GFGS, Ch. C6.2.18). Wastes intended to be recycled or used for energy recovery (e.g., used oil or antifreeze) are excempt from the accumulation limit but must be transported offsite to a final destination facility within 1 year (GFGS, Ch. C6.3.2.2.). The HWAP must be located at or near the point of generation and under the control of the operator (GFGS, Ch. C6.2.18).

Locations of the HWAPs are indicated on the list presented in Appendix 1. All HWAPs, as listed in Appendix 1, are to be operated in accordance with the following standards (GFGS, Ch. C6.3.2, C6.3.4):

- All containers in HWAPs must be handled in accordance with the provisions stated in Section 3.1 of this HWMP.
- Personnel assigned HW duties must successfully complete HW training (see Section 4 of this HWMP).
- A single container must be provided for the collection of each waste stream. Chemically incompatible wastes must be segregated accordingly. Sufficient volume must be left in containers storing liquids, so the contents can expand with increases in temperature.
- Each HWAP must have hazard signs appropriate for the waste being accumulated at that site (GFGS, Ch. C6.3.2.1).
- The HWAP must be kept secured and/or locked to avoid uncontrolled disposal of waste from unauthorized persons.
- A spill kit containing proper equipment to respond to spills must be maintained at a HWAP.
- The Garrison Red Plan must be posted at a HWAP.
- Small amounts of hazardous waste generated daily must be collected at the point of generation (i.e., in the shop bays) in proper containers and must be moved or emptied into larger containers, at a designated HWAP, on a daily basis.
- The HWAP must be kept clean and orderly. Accumulation of Solid Waste, and HW not properly containerized, is not allowed.
- The access area must be kept free at all times. “No Parking” signs must be posted to provide free access for the waste removal contractor and the Fire Department in case of an incident.

- A sufficient number of fire extinguishers must be available where flammable waste is stored. Fire extinguishers must have a valid inspection sticker.
- Hazardous materials (HM) storage is not allowed at a HWAP. All hazardous substances placed at a HWAP are treated as waste for disposal.
- HWAPs should be inspected weekly by the Unit EO or Environmental Representative of the generating unit by using a checklist (see Appendix 5).
- Generating Unit must notify the Garrison HW Manager of Containers 75 % full.
- HW Audit Trail documents (see Section 7) are maintained at the generating unit for at least 3 years.

3.4 HWSA

3.4.1 General Requirements

A HWSA is defined as a location on a DoD installation where HW is collected and stored prior to shipment for treatment or disposal. HWSAs are permitted to store more than 208 liters (55 gallons) of each waste stream and more than 1 liter (1quart) of an acute HW stream.

The HWSA at USAG Stuttgart (see Table 3-1) is considered an ordinary or conventional facilitiy; and therefore, requires a construction approval or test of suitability *(Bauartzulassung oder Eignungsfeststellung)* from the German authorities. The test of suitability was already performed prior to delivery.

Table 3-1 HWSA approved by the German Authorities

ARLOC	Facility No.	Construction Approval (Yes/No)	Suitability Test (Yes/No)	Approving German Authority	Approval Date
GE44F	3371	Y	Y	Landesumweltamt Nordrhein-Westfalen	04.12.1998

The HWSA is located at building 3371 and operated in accordance with the following standards (GFGS, Ch. C6.3.3, C6.3.4, C6.3.5):

- The HWSA that is used for storage of water endangering substances is not located in an area that is classed as Water Protection Zone I or II.
- The HWSA is not located in an area prone to flooding. The HWSA is secured against floating and shifting, and the area is designed such that water cannot enter vent pipes, filling ports or other inlets in the event of flooding. Additionally, the HWSA is resistant to mechanical damage from flooding.
- The HWSA is designed and must be operated to minimize the possibility of fire or unplanned release of HW that could threaten human health or the environment.
- HW must not be stored longer than one year at the HWSA.
- Aisle spaces in the HWSA must be sufficient to allow movements of personnel, vehicles and equipment during an emergency. Exit ways must be kept free at all times.

- An emergency phone, Personal Protective Equipment (PPE), eye-wash solution and an emergency shower must be available at the scene of operation. The emergency devices will be tested during regular inspections (see Section 3.8).
- Mobile fire extinguishers are installed at three strategic locations at the HWSA.
- Secondary containments are provided for the HWSA that is classified as Water Hazard Category C facility. The secondary containments are designed to retain 100 % volume of the largest container or 10 % of the total volume stored, whichever is greater.
- Rainwater captured in secondary containments must be inspected visually prior to release. If this inspection indicates a potential for contamination or if the nature of the hazardous waste stored is such that this inspection is not acceptable, the potentially contaminated water is submitted for laboratory testing prior to release.
- In addition, all containers in the HWSA must be handled in accordance with the provisions stated in Section 3.1.
- A HWSA is also operated in accordance with HWAP requirements listed under Section 3.3.

3.4.2 Security Systems

The HWSA is secured against unauthorized entry by a fence completely surrounding the area and a locked gate equipped with warning signs (incl. “No Smoking” and “Unauthorized Access forbidden”), hazard signs and mandatory signs both in English and German language.

3.4.3 Closure

A Closure plan has been prepared for the HWSA and is presented in Appendix 4. Additional closure plans for new HWSAs will be prepared during the HWSA planning stages, including estimates of the storage capacity of hazardous waste, steps to be taken to remove or decontaminate all waste residue, and an estimate of the expected closure date.

3.4.4 Waste Analysis Plan

A Waste Analysis Plan prepared by the Garrison HW Manager is presented in Appendix 10.

3.5 ABOVEGROUND STORAGE TANKS

The USAG Stuttgart installations have no aboveground storage tanks (ASTs) that store liquid hazardous waste in quantities that fall under the notification or permit requirement to the German Federal State (GFGS, Ch. C5.3.15). According to the German AwSV, the competent authority must be notified in writing at least six weeks in advance when an installation subject to inspection is constructed or substantially altered. No notification is required for installations that need to conduct an assessment of suitability or applications for BImSch approval (AwSV §40).

A certified removal company, contracted for disposal of HW, provides the required collection containers, including waste collection containers for liquid hazardous wastes (Abfall-Sammel-Behälter für flüssige Sonderabfälle – ASF) with up to 1,000 liters capacity or Intermediate Bulk Containers (IBC) with up to 1,000 liters capacity. The containers are tested, certified for transportation on roads, and labelled by the UN-Markings. The liquid level in the containers must be shown by a fill level indicator or must be visually controlled to ensure the filling process is stopped before the acceptable filling level is reached.

Government-owned aboveground waste oil collection tanks >1m^3 must be regularly inspected by an authorized expert (*zugelassener Sachverständiger*). The following tank-specific

requirements must be verified during the inspection, according to the regulatory requirements, and as appropriate for the substance stored in the tank:

- Tank specifications, such as size, contents, and construction type, are clearly indicated on each AST.
- Tank storage areas have secondary containment systems that is sufficiently impervious or capable of holding and contain leaks and spills of liquid or solid hazardous waste.
- In addition, all requirements outlined in Section 3.1 also apply to tank systems storing hazardous waste.

3.6 UNDERGROUND STORAGE TANKS

The USAG Stuttgart installations uses underground storage tanks (USTs) for collecting waste oil. A list of the USTs is provided in Appendix 1.

All USTs that store waste oil must be inspected by an authorized expert *(zugelassener Sachverständiger,* e.g., *TÜV)* prior to their initial use to obtain an operating permit. Each UST must be inspected by an authorized expert every five years after the initial inspection to refresh the operating permit. In case the UST is located in a water protection area, the inspection must be performed every 2.5 years (GFGS Section C5.3.14.3.). According to the German AwSV, these inspection periods will remain unchanged (AwSV §46 and Appendix 5 & 6).

Additionally, expert inspections will be conducted under the following conditions:

- When significant modifications to the facilities are made,
- If the competent German authority issues an inspection request due to a suspected threat to water bodies,
- After decommissioning a facility, and
- After the re-commissioning or re-opening of a facility that has been closed for more than one year.

During normal facility operations UST inspections must be performed on a yearly basis by an authorized expert to include checking of the operating and leak detection systems. The inspection reports must be provided to the ED.

Problems identified during the inspections need to be addressed to the ED as appropriate. Deficiencies that are imminently dangerous to human health and the environment (such as alarm system failures) must be reported to the ED immediately.

Records of the UST inspections must be entered to the tanks logbook and shall be maintained for at least three years at the ED. Additionally, the results shall be entered into the applicable Database of the ED.

3.7 USED OIL (MOTOR/ENGINE)

Whenever possible, processing of used oil is given priority over burning used oil for energy recovery or otherwise disposing of used oil. In general, used oil fuel may be burned in facilities that have a permit issued by the appropriate German authorities, but no used oil is burned at USAG Stuttgart. Used oil, HW, or used oil contaminated with any HW will not be used for dust suppression or road treatment.

Used cooking oil must be collected and disposed of separately through the DPW Recycling Center.

3.8 INSPECTIONS

Unit Inspections

The EO or Environmental Representative of a HW generating unit has to perform internal weekly inspections of the HWAP by using appropriate checklists. If a waste oil tank is used, daily inspections of the tank facility is required. Appendix 5 provides example checklists that may be used to perform internal inspections.

Any non-compliance that cannot be resolved by the HW generating unit must be reported to the ED immediately. Any deficiencies of containers where a potential release of hazardous waste may occur or any malfunctions of the waste oil tank control systems must be reported to the ED immediately.

If the acoustic alarm of the waste oil tank is turning on, the unit is allowed to turn off the acoustic alarm followed by immediate reporting of the failure to the ED. Self-repairs at the waste oil facility are prohibited.

ED Inspections

The ED HW manager and/or assigned contractor personnel conducts on-site environmental inspections as required throughout the year. Usually these inspections will also include areas other than Hazardous Waste. The results of the inspections will be recorded by using the checklists provided in Appendix 5. The ED will conduct re-inspections as needed to verify the completion of corrective actions.

The ED performs once a year an Internal Environmental Performance Assessment and Assistance System (EPAAS) audit. The findings of the audit will be recorded and reported to the IMCOM-E Environmental Division by using a shared database. The progress of corrective actions of findings will be tracked by the ED.

Appointments for the inspections and the audit will be made in advance with the EO or Environmental Representative.

Besides the schedules, units are also encouraged to request courtesy inspections at the ED.

External Inspections

The IMCOM-E Environmental Division performs every three years an external Environmental Performance Assessment and Assistance System (EPAAS) audit. The audits will be performed by IMCOM-E representatives and will take 5 days. The audit will cover all environmental medias.

The results of the audit will be summarized and presented to the Garrison Commander and his staff, and to the unit representatives during an out-brief conference. The findings will be tracked in an IMCOM-E shared database. The progress of corrective actions of findings will be tracked by the DPW ED on a regular basis.

The DPW ED will inform all stakeholders of the EPAAS schedule in advance.

4. TRAINING

All personnel who are involved in handling, storage, and disposal of hazardous waste must receive appropriate training before executing work duties involving exposure to hazardous waste. At the minimum, a First Responder Awareness Training (Level I) must be given verbally, by a trained employee, to all persons working with hazardous waste prior to initiating work. Appendix 7 provides an example form used to document training.

All personnel performing hazardous waste duties must complete an initial 40-hour OSHA Training. The Environmental Officer (EO) must complete an initial 40-hour EO Training. Personnel who have completed the initial EO or OSHA training must perform an 8-hour refresher training annually. The ED may be contacted for EO training updates.

The OSHA and EO training programs include sufficient information to enable personnel to perform their assigned tasks while complying with HW requirements. Personnel are instructed in the following key areas:

- Emergency Procedures: response to fire/explosion/spills; use of communications/alarm systems, emergency equipment and emergency systems; body and equipment clean-up;
- Safe use of hazardous waste equipment: drum/container handling/storage;
- Employee Protection: PPE, safety and health hazards, hazard communication, worker exposure to HS; and,
- Recordkeeping, security, inspections, contingency plans, storage requirements, transportation requirements.

Training courses, attendees, and dates of completion are documented and tracked by the ED HW Manager for the time of assigned duty. All relevant training documents shall be kept at the responsible unit office for the time of assigned duty and at least three years after the termination of duty of these personnel.

Appendix 7 provides guidance on required training by activity and general position description.

Training opportunities for Hazardous Waste Management and for Spill Response Training can also be requested at the ED HW Manager.

5. TRANSPORTATION

5.1 OFF-POST TRANSPORTATION PROCEDURES

All off-post transportation of HW must be performed only by permitted transportation companies. All other off-post transportation of hazardous waste is strictly prohibited. The ED HW Manager must verify that contracted companies fulfill the requirements and own all necessary licenses and approvals to transport dangerous goods on road, according to the ADR.

Tenant Units or other activities that have approved personnel, licenses and vehicles capable to transport dangerous goods are NOT automatically allowed to transport HW, too.

HW must not be transported outside the installation boundaries from units or other activities.

5.2 ON-POST TRANSPORTATION PROCEDURES

The transportation of hazardous waste on-post is performed according to the following procedures:

- Hazardous waste must be only transported by ADR trained personnel who have the proper transportation vehicles and equipment, and transport HW only in limited quantities (max. 55 gallon / 208 Liter, or 1-liter [1-quart] of acute hazardous waste).
- Vehicles must be in good condition, have sufficient storage space, enough carrying capacity, and provisions to secure loads.
- Appropriate material handling equipment must be used to load, transport, and unload containers. This equipment includes drum dollies, forklifts, drum handling equipment, lift gates, and pallets. Drums must not be rolled on or off vehicles.
- Loads must be properly placed on vehicles. Hazardous waste containers must be placed and secured in stable positions. The containers must not be placed such that they overhang, perch, or lean.
- Loads must be secured with straps, clamps, braces, or other measures to prevent movement and loss. Forklifts must not be used to transport drums and containers that are not secured.

6. DISPOSAL

The HW must be collected at the Garrison at designated HWAPs until final removal through a waste removal company to dispose of its HW in appropriately permitted facilities.

The EO or the responsible person of each HWAP must request pick-ups at the ED upon detection of 75 % full containers. The ED performs the required documentation and scheduling with the removal contractors.

6.1 DLA-CONTRACT

The Garrison contracts through the Defense Logistics Agency (DLA) located at Kaiserslautern, Germany. The ED HW Manager, as a representative of the DLA, collects pick-up requests and prepares and stores the required documentation which will be submitted to the DLA. The DLA will then provide a Delivery Order and within 14 days the pick-up will be performed by German transportation contractors for disposal off-base at host nation disposal facilities in accordance with German regulatory requirements. The HW Manager signs the acceptance slip (*Übernahmeschein*) when the HW is picked-up by the contractor.

HW must not be transported to the DLA from tenant units and other organizations as off-post transport is strictly prohibited (see Section 5.1), and the DLA has no permitted facility to store hazardous waste.

Attempts to turn-in HW at the DLA from units will be rejected and the HW must be transported back to the Garrison.

6.2 TENDERING OF HAZARDOUS WASTE

Hazardous Waste shall be tendered to the Sonderabfallagentur Baden-Wuerttemberg in accordance with the specific waste disposal regulations of Baden-Wuerttemberg.

The tendering is performed by the contracted certified waste disposal company on behalf of the Garrison as the HW generator.

6.3 HAZARDOUS WASTE IDENTIFICATION

The ED HW Manager maintains Hazardous Waste Profile Sheets (HWPSs) for each hazardous waste stream generated at the Garrison. Each HWPS will be updated und submitted to the DLA annually.

6.4 WASTE STREAMS

The following waste streams can be disposed under the current contracts:

Acids

Adhesive, Glues

Aerosol cans

Antifreeze

Asbestos containing items

Bases

Batteries dry-cell, lithium, Nickel-Cadmium, lead-acid

Compressed Gas Cylinders

Contaminated containers, metal

Contaminated containers, plastic

Detergent, liquid and solid

Fire extinguisher and residues

Gas Cartridges

Grease

Heavy metals, heavy metal contaminated solids and liquids

Laboratory chemicals

Light tubes and lamps

Paints

PCB containing items

Pesticides, liquid, solid, aerosols

POL contaminated filters

POL contaminated solids

Printer cartridges

PU-foam aerosols

Solvents

Waste fuel

Waste oil (Motor/Engine oils)

The following items cannot be disposed under the current contract:

Ammunitions

Arms and weapons

Biohazard materials

Explosives

Radioactive materials

*Tires**

*Used Cooking Oil**

**Should be turned into the DPW Recycling Yard for disposal*

7. DOCUMENTATION

The ED maintains an audit trail for hazardous waste disposal from the point of generation to ultimate disposal. The records are maintained for at least 3 years at the ED (see Table 7-1).

7.1 HAZARDOUS WASTE DISPOSAL DOCUMENTATION

All hazardous waste disposed under the current contracts (DLA-contract) are tracked and recorded at the ED.

The documentation includes:

- Acceptance slips and Manifests *(Übernahmescheine und Entsorgungsnachweise)*
- Delivery Orders and Modifications
- 1348-1A Forms
- Pick up Checklists
- Delivery slips and invoices
- Relevant correspondence

HW generating units are responsible to manage their own HWAP and must maintain a Hazardous Waste Audit Trail for hazardous waste disposal from the point of generation to final disposal (GFGS C6.3.1.4.3). Appendix 9 describes detailed instructions.

7.2 MONTHLY STATUS REPORT (MSR) AND YEARLY STATUS REPORT (YSR)

The waste removal company contracted through DLA provides monthly reports of the HW removed from the Garrison. Additionally, the company provides a yearly report of the waste removals sorted by building numbers. The status reports include all HW related data from the point of generation to the final disposal or recycling facility.

7.3 MANIFESTS

The manifests contain the following information:

- Name and address of the hazardous waste generator;
- Hazardous waste generator number *(Abfallerzeugernummer);*
- Transporter's name and address;
- Destination name and address;
- The six-digit EWL (European List of Wastes) code of the hazardous waste stream;
- Total quantity of waste in metric tons;
- Date of shipment;
- Date of receipt by the destination facility;
- Container number and size;
- Waste description according to ADR;
- Contract and item number;
- CLIN number;
- Manifest number.

Table 7-1 Recordkeeping

Record	Time maintained	Location where record is maintained
Hazardous Waste Disposal Documentation (incl. YSR, MSR, Contract documentation)	5 years, or until the transfer of surveillance documentation to the Contracting Officer upon completion of the contract	ED (Contracting Officer Representative (COR))
Hazardous Waste Log (FGS-G C6.3.5.2)	Until Closure of Installation	ED (HW manager)
Internal inspection Checklists for HWSA (FGS-G C6.3.3.8) and Waste Oil UST (see Section 3.6)	3 years	ED (HW manager)
External Inspection documents for systems requiring inspection according to German legislation	As long as the system is being used	At the place of operation
HW Audit trail documents, Inspection checklists	3 years	Unit level (EO)
Training documentation	3 years after termination of employment	Unit level (EO, Training Officer)

8. CONTINGENCY PLANS

The USAG Stuttgart has developed a Spill Prevention and Response Plan (SPRP) that describes how to respond to spills and releases of hazardous substances, including hazardous waste. Part of the SPRP is the Red Plan that serves as an immediate action tool to initiate the correct response at the earliest possible time. The Red Plan must be posted at all locations, where a potential release of hazardous waste or hazardous substance could occur.

Chapter 1.1.2 of the SPRP describes the sections that may be used to develop a Contingency Plan.

The HWSA, the on-site Fire Department, the on-site hospitals, and any emergency response teams identified in the plan must be provided with a copy of the SPRP. Updates must be forwarded to these organizations as appropriate.

HWAP Managers must maintain a copy of the HWMP and the SPRP. Each HWAP must be provided with copies of the Red Plan. The Red Plan must be available in German and in English.

9. REFERENCES

Federal Recycling Act (Kreislaufwirtschaftsgesetz – KrWG). 24 February 2012, last amended 9 Oct 2020

Ordinance on the European Waste Catalogue (Abfallverzeichnisverordnung AVV). 10 December 2001, last amended 30 Jun 2020

Ordinance on facilities handling water-endangering substances *(Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen – AwSV),* 18 April 2017, last amended 19 Jul 2020

Environmental Final Governing Standards for Germany, US Army IMCOM Europe Region, September 2020

HQ USAREUR & IMCOM Europe, 8 May 2012, Army in Europe Regulation *AER 200-1, Environmental Quality, Army in Europe Environmental Quality Program.*

Army Regulation AR 200-1, Environmental Protection and Enhancement*. HQ Department of the Army, Washington DC, 13 December 2007*

ADR 2023, European Agreement concerning the International Carriage of Dangerous Goods by Road, 27. Änderungsverordnung 1 January 2023

Appendix 1

List and locations of HWSA, HWAPs, HWBATs, HWCONs, and Waste Oil Tanks

Table A-1.1.1 List of HWAPs

ARLOC	Facility Number	Unit/ Activity/ Organization	Official Waste Generator Number
GE72T	116	DPW/ED	H01400101-3
GE46J	979	MWR Golf Course	H05400174-6
GE656	2316	DPW/ ED	H01400101-3
GE656	2353	Garrison Maintenance Contractor	H01400101-3
GE656	2349	AAFES Gas Station	H01400101-3
GE643	2929	MWR Auto Skills Center	H02400100-2
GE643	2935A	AAFES CCC	H02400100-2
GE643	2935B	TLSCE/ MAV Det.	H02400100-2
GE643	2958A	554th Military Police	H02400100-2
GE643	2958B	405th AFSB LRC	H02400100-2
GE643	2969	1/10th Special Forces Group	H02400100-2
GE643	2970	NSWU/2	H02400100-2
GE643	2974	DPW/ ED	H02400100-2
GE643	2996A	Dental Clinic	H02400100-2
GE643	2996B	Veterinary Clinic	H02400100-2
GE19B	3219	DPW/ ED	H03190580-9
GE44F	3318	DPW Shops	H01400101-3
GE44F	3319	MWR Arts and Crafts Shop	H01400101-3
GE44F	3320A	405th AFSB BASOPS	H01400101-3
GE44F	3320B	MWR Auto Skills Center	H01400101-3
GE44F	3324	AMC/AAFES Gas Station	H01400101-3
GE44F	3360	DPW Recycling Yard	H01400101-3

Table A-1.1.2 List of HWBATs

ARLOC	Facility Number	Unit/ Activity/ Organization	Official Waste Generator Number
GE72T	146	RB Commissary/AAFES Furniture Store	H01400101-3
GE72T	148	RB Elementary/Middle Schools	H01400101-3
GE72T	151	RB Fitness Center	H01400101-3
GE656	2211	Health Clinic	H01400101-3
GE656	2325	Patch Post Office	H01400101-3
GE656	2333	Garrison Maintenance Contractor	H01400101-3
GE656	2337	Patch Fitness Center	H01400101-3
GE656	2349	AAFES Gas Station	H01400101-3
GE656	2350	Patch Commissary	H01400101-3
GE656	2388	Patch Middle School	H01400101-3
GE656	2390	Patch Elementary School	H01400101-3
GE643	2903	Panzer Main Exchange, PX	H02400100-2
GE643	2918	Patch Elementary School	H02400100-2
GE643	2952	Military Clothing	H02400100-2
GE643	2957	Panzer Commissary	H02400100-2
GE643	3080	Panzer High School	H02400100-2
GE643	3081	Panzer Elementary School	H02400100-2
GE643	2990	Panzer Fitness Center	H02400100-2
GE19B	3220	VMR SPMAGTF C12W, Hangar 2	H03190580-9
GE19B	3227	Hangar 5 Outside	H03190580-9
GE19B	3254	DES Fire Department	H03190580-9
GE19B	3255	Airfield Management	H03190580-9
GE44F	3312	Kelley Post Office	H01400101-3
GE44F	3317	Bus station	H01400101-3
GE44F	3324	AMC/AAFES Gas Station	H01400101-3
GE44F	3326	Kelley Fitness Center	H01400101-3

Table A-1.1.3 List of HWCONs

ARLOC	Facility Number	Unit/ Activity/ Organization	Official Waste Generator Number
GE46J	975	MWR Golf Course	DPW is not responsible
GE656	2330	Food Court	DPW is not responsible
GE643	2903	PX	DPW is not responsible
GE643	2913	German Kantine	DPW is not responsible
GE643	2998	Bowling Center	DPW is not responsible
GE44F	3362	Subway	DPW is not responsible

Table A-1.2 List of HWSA

ARLOC	Facility Number	Unit/ Activity/ Organization	Official Waste Generator Number	AwSV Hazard Level
GE44F	3371	DPW/ ED	H01400101-3	D

Table A-1.3 List of Waste Oil Tanks

ARLOC	Facility Number	Unit/ Activity/ Organization	Official Waste Generator Number	AwSV Hazard Level
GE46J	979	MWR Golf Course	H06500174-6	B
GE643	2929	MWR Auto Skills Center	H02400100-2	C
GE643	2930	MWR Auto Skills Center	H02400100-2	N/A*
GE643	2935A	TLSCE/ MAV Det./ AAFES	H02400100-2	C
GE643	2958A	55th Military Police	H02400100-2	C
GE643	2969	1/10th Special Forces Group	H02400100-2	C
GE643	2970	NSWU/ 2	H02400100-2	B
GE19B	3262	VMR SPMAGTF C12W	H03190580-9	C
GE44F	3320	405th AFSB BASOPS & MWR Auto Skills Center	H01400101-3	C
GE44F	3371	DPW/ED	H01400101-3	B

*Tank not in use

Figure 1: Locations of HWAPs, HWBATs, HWCONs, and Waste Oil Tanks at Patch Barracks

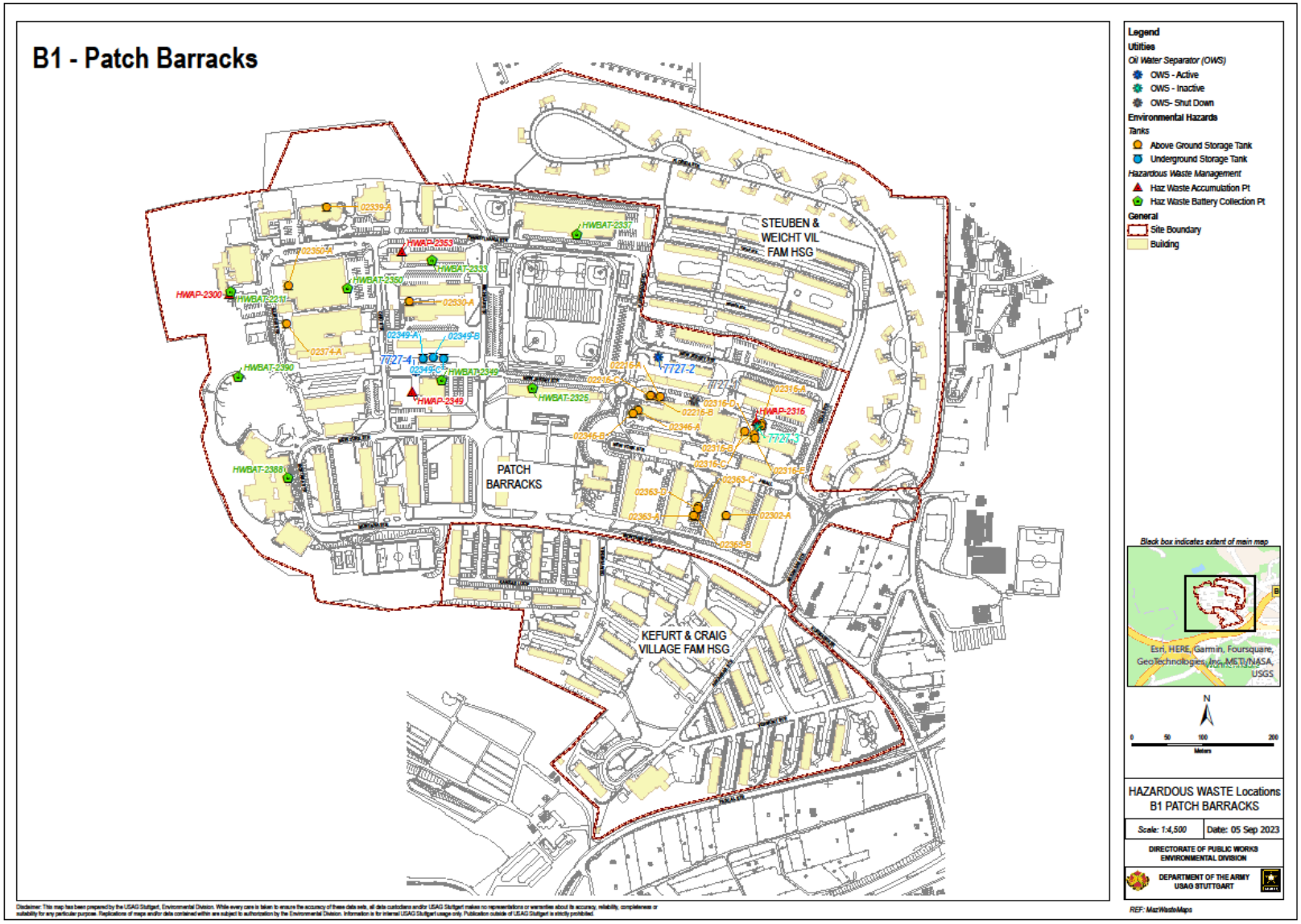


Figure 2: Locations of HWAPs and HWBATs at Robinson Barracks

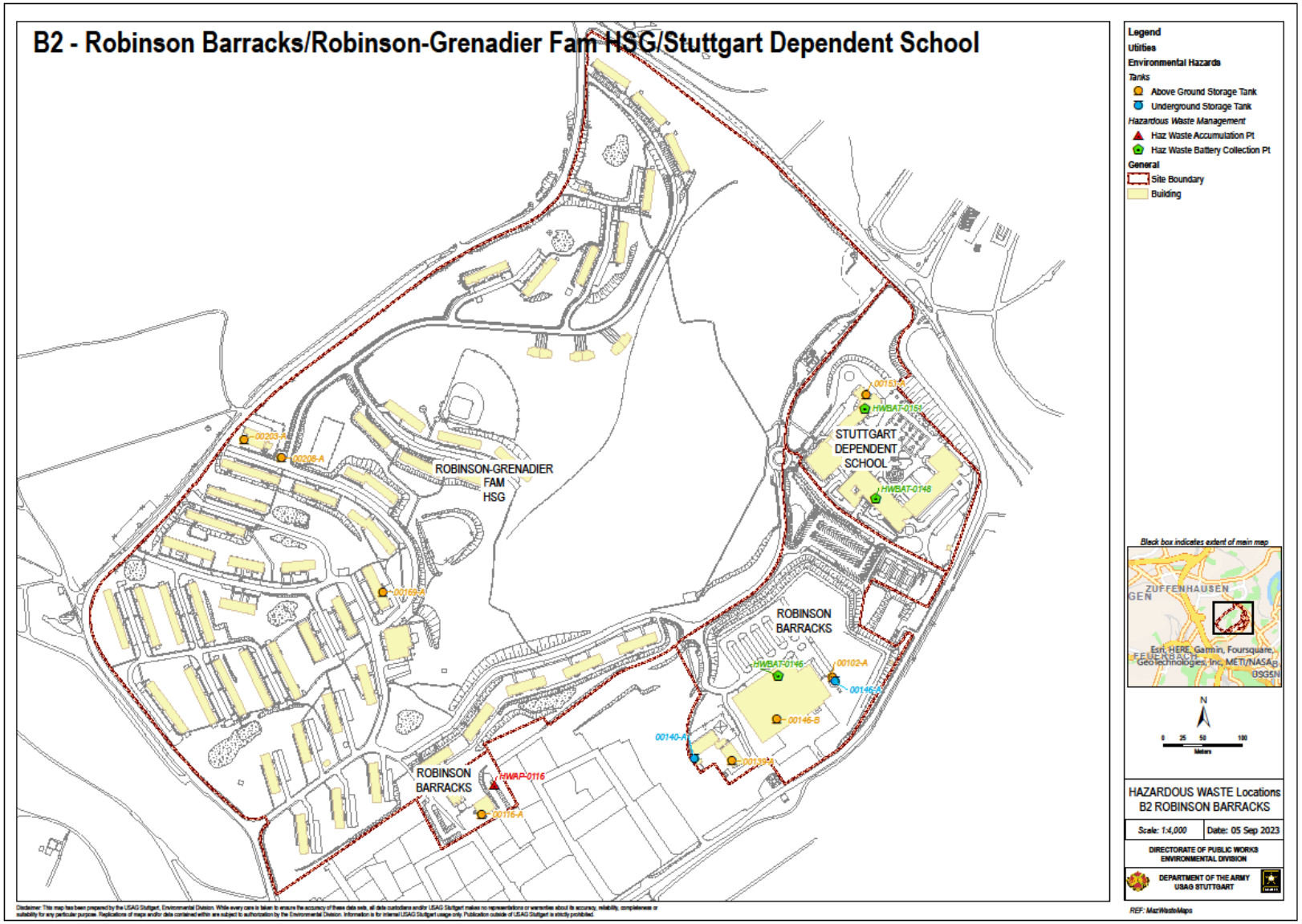


Figure 3: Locations of HWAPs, HWCONs, and Waste Oil Tanks at Kornwestheim Golf Course

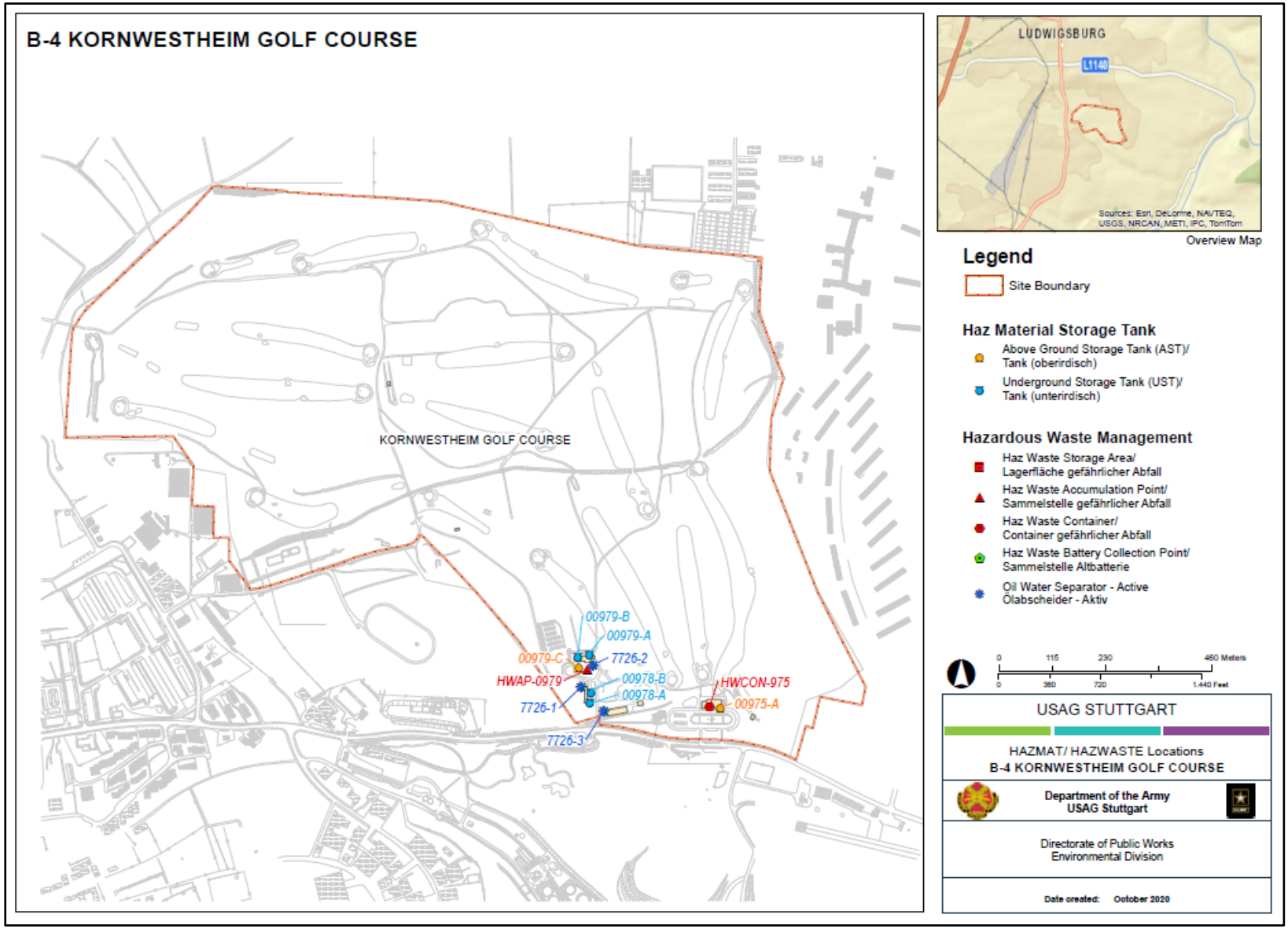


Figure 4: Locations of HWSA, HWAPs, HWBATs, HWCONs, and Waste Oil Tanks at Kelley Barracks

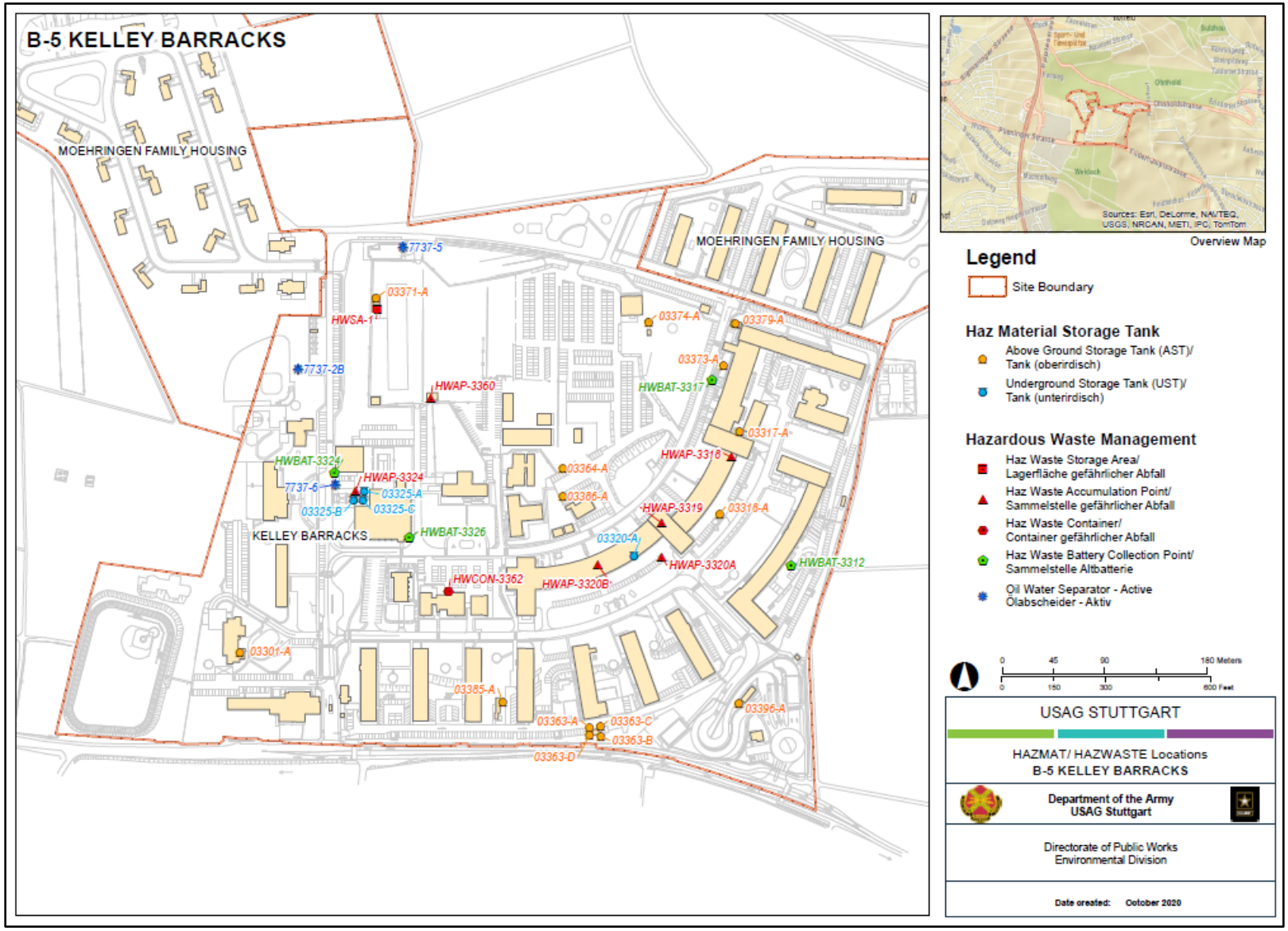


Figure 5: Locations of HWAPs, HWBATs, and Waste Oil Tanks at Echterdingen Airfield (East)

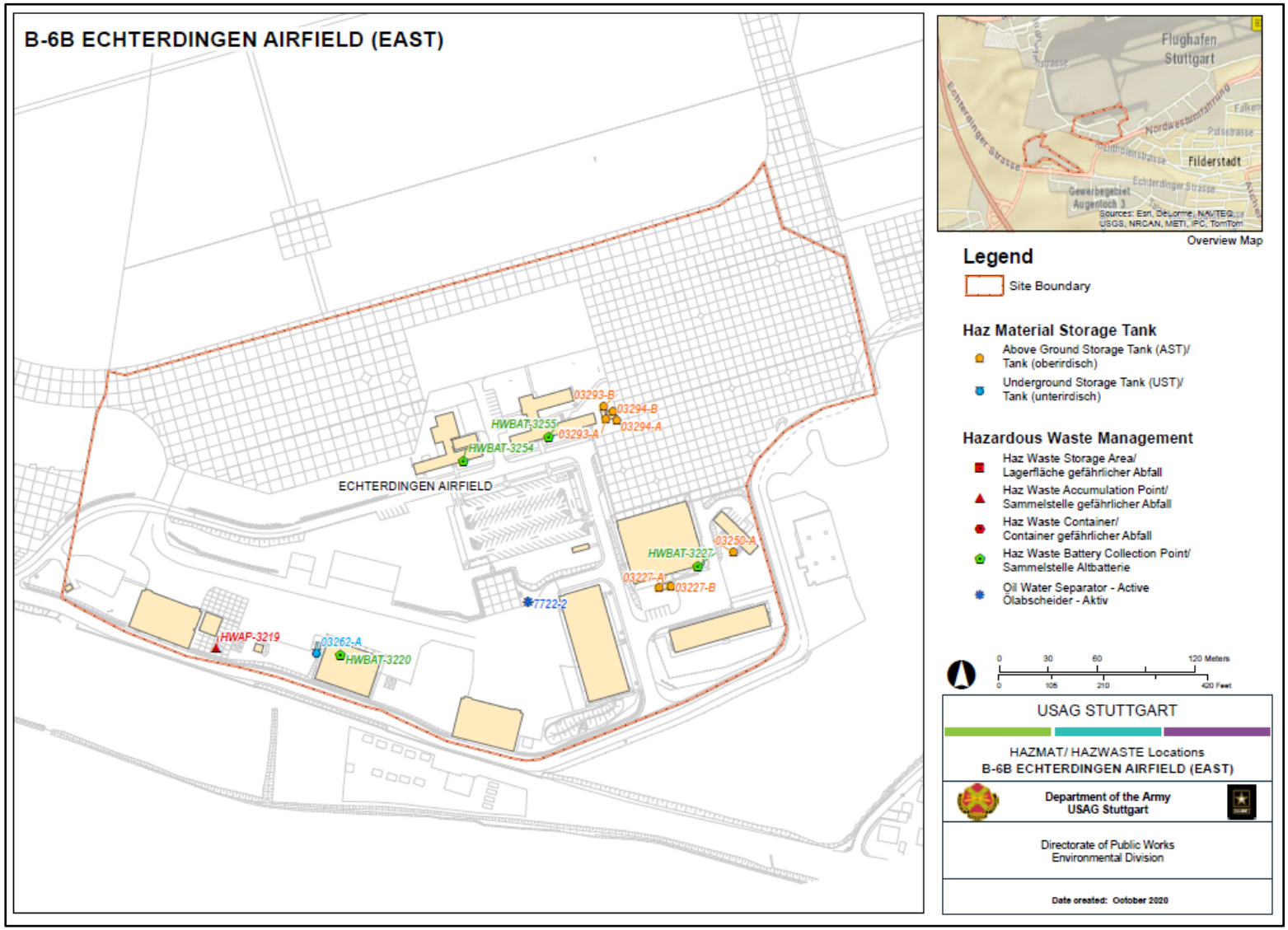
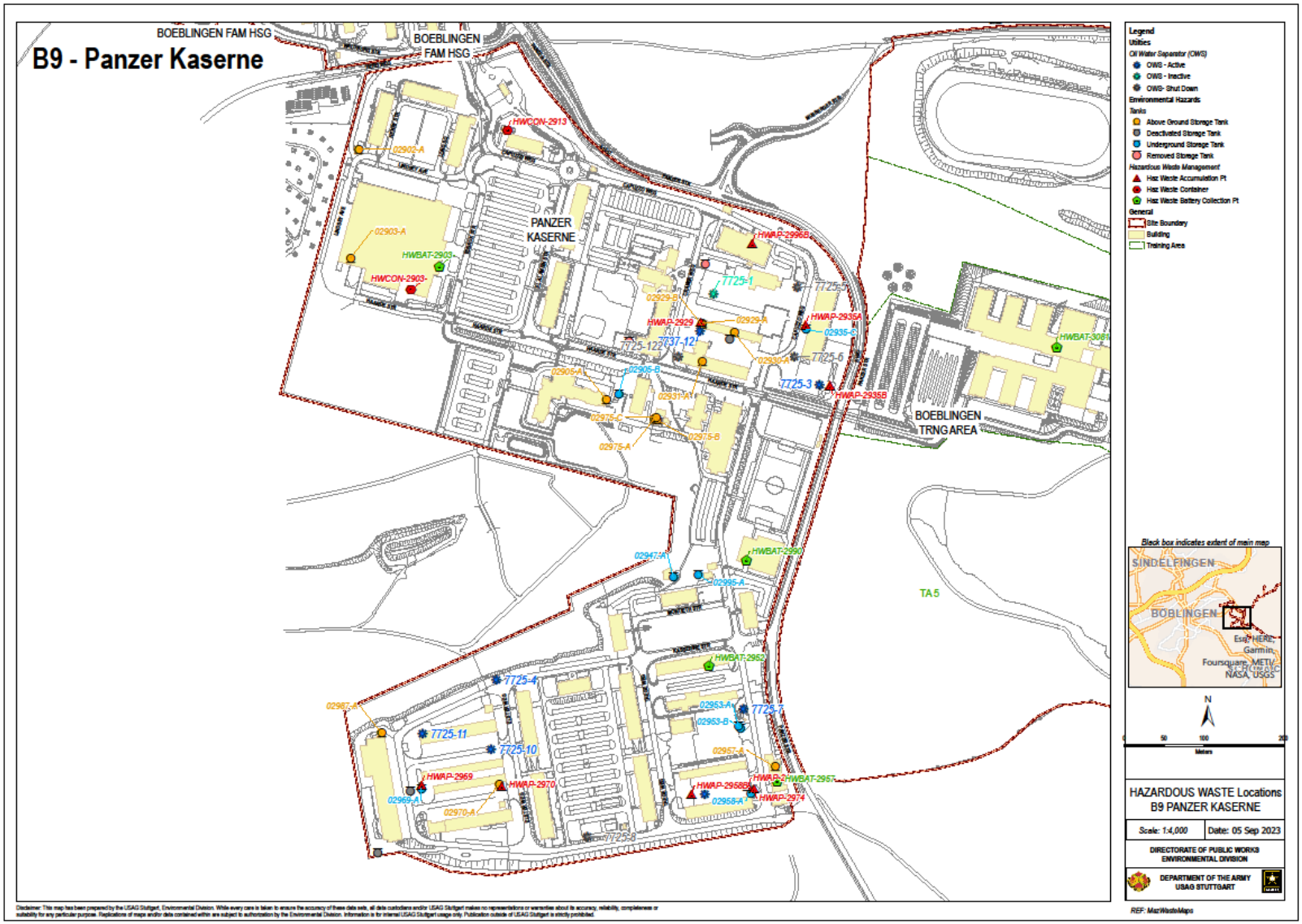


Figure 6: Locations of HWAPs, HWBATs, HWCONs, and Waste Oil Tanks at Panzer Kaserne



Appendix 2

Sample Container Label

Hazardous Waste / Sonderabfall

N2190 **POL contaminated solids, including but not limited to rags, absorbents, plastic containers, activated carbon**

EWC 150202 Ölverschmutzte Betriebsmittel

Abfall, UN 3175, FESTE STOFFE , DIE ENTZÜNDBARE FLÜSSIGE STOFFE ENTHALTEN, N.A.G., 4.1 II

H241	Heating may cause fire or explosion.	H241	Erwärmung kann Brand oder Explosion verursachen.
H319/335	Causes serious eye irritation/May cause respiratory irritation.	H319/335	Verursacht schwere Augenreizung/Kann die Atemwege reizen.
P210	Keep away from heat/sparks/open flames/hot surfaces. – No smoking.	P210	Von Hitze/Funken/offener Flamme/heißen Oberflächen fernhalten. Nicht rauchen.
P270	Do not eat, drink or smoke when using this product.	P270	Bei Verwendung dieses Produkts nicht essen, trinken oder rauchen.

Generator ID:
US Army Garrison Stuttgart
DPW Environmental Division
POC:
DSN: 596-6135
Civ.: 09641-70596-6135
Fire Department: DSN 112

Location
Building

POC

SÜD-MÜLL
GmbH & Co. KG
für Abfalltransporte und
Sonderabfallbeseitigung
Gerolsheimer Straße
67258 Heßheim
Tel. 06233-7701-0
us-service@sued-muell.com
http://www.sued-muell.com

Required Symbols: F

Hazardous Waste / Sonderabfall

N2570 **Ethylene Glycol (Antifreeze), may be contaminated with, but not limited to dirt, oil, fuel**

EWC 160114 Ethylenglykol (Frostschutzmittel)

H302 Harmful if swallowed. **H302 Gesundheitsschädlich beim Verschlucken.**

Generator ID:
US Army Garrison Stuttgart
DPW Environmental Division
POC:
DSN: 596-6135
Civ.: 09641-70596-6135
Fire Department: DSN 112

Location
Building

POC

SÜD-MÜLL
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us-service@sued-muell.com
http://www.sued-muell.com

Required Symbols: Xn

Hazardous Waste / Sonderabfall

N2620 **Containers, plastic, < 50 cm (height), previous hazardous contents include but are not limited to oil, paint, acids**

EWC 150110 Plastikemballagen < 50 cm

Abfall, UN 3175, FESTE STOFFE , DIE ENTZÜNDBARE FLÜSSIGE STOFFE ENTHALTEN,Abfall, UN 3175, FESTE STOFFE , DIE ENTZÜNDBARE FLÜSSIGE STOFFE

H241 Heating may cause a fire or explosion.	H241 Erwärmung kann Brand oder Explosion verursachen.
H315/319/335 Causes skin irritation, serious eye irritation and respiratory irritation.	H315/319/335 Verursacht Haut- und Augenreizung, Reizung der Atemwege.
P210 Keep away from heat/sparks/open flames/hot surfaces. – No smoking.	P210 Von Hitze/Funken/offener Flamme/heißen Oberflächen fernhalten. Nicht rauchen.
P270 Do not eat, drink or smoke when using this product.	P270 Bei Verwendung dieses Produkts nicht essen, trinken oder rauchen.

Generator ID:
US Army Garrison Stuttgart
DPW Environmental Division
POC:
DSN: 596-6135
Civ.: 09641-70596-6135
Fire Department: DSN 112

Location
Building

POC

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us-service@sued-muell.com
http://www.sued-muell.com

Required Symbols: F

Hazardous Waste / Sonderabfall

FL01C8 **Aerosols, ferric metal with harmful residual contents**

EWC 160504 Aerosole (Druckgaspackungen)

Abfall, UN 1950, DRUCKGASPACKUNGEN, 2.1

H203 Explosive; fire, blast or projection hazard.	H203 Explosiv; Gefahr durch Feuer, Luftdruck oder Splitter, Spreng- und Wurfstücke.
H241 Heating may cause a fire or explosion.	H241 Erwärmung kann Brand oder Explosion verursachen.
H311+H331 Toxic in contact with skin or if inhaled.	H311+H331 Giftig bei Hautkontakt oder Einatmen
P210 Keep away from heat/sparks/open flames/hot surfaces. – No smoking.	P210 Von Hitze/Funken/offener Flamme/heißen Oberflächen fernhalten. Nicht rauchen.
P270 Do not eat, drink or smoke when using this product.	P270 Bei Verwendung dieses Produkts nicht essen, trinken oder rauchen.

Generator ID:
US Army Garrison Stuttgart
DPW Environmental Division
POC:
DSN: 596-6135
Civ.: 09641-70596-6135
Fire Department: DSN 112

Location
Building

POC

SÜD-MÜLL
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67258 Heßheim
Tel. 06233-7701-0
us-service@sued-muell.com
http://www.sued-muell.com

Required Symbols: F, T

Appendix 3

State-Specific Requirements

STATE-SPECIFIC STORAGE TANK REQUIREMENTS (according to German regulation for handling of substances that are hazardous to water – AwSV)

The following text provides short excerpts of the most relevant paragraphs of the AwSV. For further details, please refer to the original document.

§39 Hazard levels of facilities

(1) Operators must assign a hazard level to facilities according to the table below. In the case of liquid substances, the decisive volume for the facility in question should be taken as the basis, while the decisive mass for the facility in question should be taken as the basis in the case of gaseous and solid substances.

Table A-3.1 Hazards levels based on volume and Water Hazard Class

Determination of the hazard levels	**Water hazard class (WHC)**		
Volumes in cubic metres (m^3) or mass in tonnes (t)	**1**	**2**	**3**
≤ 0.22 m^3 or 0.2 t	Level A	Level A	Level A
> 0.22 m^3 or 0.2 t ≤ 1	Level A	Level A	Level B
> 1 ≤ 10	Level A	Level B	Level C
> 10 ≤ 100	Level A	Level C	Level D
> 100 ≤ 1 000	Level B	Level D	Level D
> 1 000	Level C	Level D	Level D

More details to this table are described in sections (2) to (11) of §39 AwSV.

§43 Documentation relating to the facility

(1) The operator shall keep documentation relating to the facility, which includes the key information pertaining to it. This includes, in particular, information on the layout and demarcation of the facility, on the substances used, the design, the materials used in the individual parts of the facility, on safety devices and safeguards, fire water retention and stability. In the event of a change of operator, the documentation must be handed over to the new operator.

More details are described in sections (2) to (3) of §43 AwSV.

§44 Operating instructions; instruction sheet

(1) The operator shall keep operating instructions to hand which contain monitoring, maintenance and emergency plans and stipulate urgent measures to prevent detrimental changes to the characteristics of bodies of water. (…). The operator shall ensure compliance with the operating instructions and also that they are kept up to date.

(2) The facility's operating personnel must then be instructed on how to conduct themselves according to the operating instructions before commencing work and at appropriate intervals on a regular basis thereafter, but at least once a year. The operator must then document that the instruction has been carried out.

(3) The operating instructions must be accessible to the facility's operating personnel at all times.

(4) Paragraphs 1 to 3 shall not apply to

1. facilities in hazard level A,

2. petrol stations for own consumption,

3. fuel oil consumer installations,

4. facilities for handling floating liquid substances with a volume of up to 100 m^3 and

5. facilities containing up to 1 000 tonnes of solid mixtures.

Instead, in the case of facilities as per sentence 1 point 3, the instruction sheet on operating regulations and the code of conduct when operating fuel oil consumer installations as per Appendix 3 and, in the case of facilities as per sentence 1 points 1, 2, 4 and 5, the instruction sheet on operating regulations and the code of conduct when handling substances that are hazardous to water as per Appendix 4, must be permanently displayed in an easily visible location in the vicinity of the facility. The affixing of the instruction sheet as per Appendix 4 can be dispensed with if the information stipulated therein is documented by other means in the vicinity of the facility such that it is easily visible. In the case of facilities for utilising substances that are hazardous to water in hazard level A which are operated outdoors outside of municipalities, it shall suffice to display a telephone number in an easily visible location that can be used to alert people to operational malfunctions.

§45 Obligation to employ a specialist company; exemptions

(1) The following facilities, including all the parts thereof, may only be erected, cleaned internally, repaired and decommissioned by specialist companies in accordance with § 63:

1. underground facilities;

2. aboveground facilities for handling liquid substances that are hazardous to water in hazard levels C and D;

3. aboveground facilities for handling liquid substances that are hazardous to water in hazard level B within water protection areas;

4. fuel oil consumer installations in hazard levels B, C and D;

5. biogas facilities;

6. facilities for handling intermodal transport; and

7. facilities for handling floating liquid substances pursuant to § 3(2) sentence 1 point 7.

(2) By way of deviation from paragraph 1, work on facilities or parts thereof, which is not of direct importance for the safety of the facility, does not have to be performed by specialist companies.

§46 Operator's monitoring and inspection duties

(1) The operator must inspect the imperviousness of the facility and the functionality of the safety devices at regular intervals. (…).

(2) Operators must arrange for facilities located outside of protected areas and defined or provisionally secured flood plains to be inspected to ensure that they are in proper working order at inspection times and intervals established in accordance with Appendix 5.

(3) Operators must arrange for facilities located inside protected areas and in defined or provisionally secured flood plains to be inspected to ensure that they are in proper working order at inspection times and intervals established in accordance with Appendix 6.

(4) The competent authority may order a one-off inspection or recurrent inspections, (…).

(5) Operators must arrange for facilities in which a significant or hazardous defect has been detected in accordance with § 48(2) to be reinspected once the defect has been rectified in accordance with § 49(1).

More details are described in sections (6) to (7) of §46 AwSV.

§47 Inspection by experts

(1) Inspections as per § 47(2) to (5) may only be conducted by experts.

(2) The expert must classify the facility based on the outcome of the inspections in accordance with § 47 into one of the following classes:

1. free from defects,

2. with minor defects,

3. with significant defects or

4. with hazardous defects.

(3) The expert must submit an inspection report to the competent authority on the outcome of each inspection he has conducted in accordance with § 47 within 4 weeks of the date of the inspection. The expert shall inform the competent authority of any hazardous defects forthwith. (…)

(4) If, once the inspection is complete, the expert classifies a fuel oil consumer installation as being 'free from defects' or 'with minor defects' in accordance with paragraph 2, he shall affix a sticker to the facility in an easily visible location which indicates the date the inspection was carried out and the date of the next one.

(5) While inspecting a fuel oil consumer installation, the expert shall hand over to the operator the instruction sheet as per Appendix 3 if such an instruction sheet has not already been displayed on the facility.

§48 Rectification of defects

(1) If the inspections as per § 47 which have been carried out by an expert reveal minor defects, the operator must rectify these defects within 6 months and, if required in accordance with § 46, must have said defects eliminated by a specialist company pursuant to § 63. Significant and hazardous defects must be eliminated forthwith, however.

(2) If the expert detects a hazardous defect within the meaning of § 48(2) point 4 during his inspection in accordance with § 47, the operator must shut down the facility straight away and, if this is deemed necessary on the basis of an assessment by the expert, drain it. The facility may only be put back into operation if the competent authority is in receipt of confirmation from the expert that the defects have been remedied successfully.

§49 Requirements pertaining to facilities in protected areas

(1) Facilities may not be erected and operated within the coverage area and the narrower zone of protected areas.

More details about facilities that may not be established (or expanded if already existing) in the broader zone of protected areas are described in sections (2) and (3) of §49 AwSV.

(4) The competent authority may issue an exemption from the requirements (…).

(5) Paragraphs 2 and 3 shall not apply if Federal State ordinances on defining protected areas lay down more extensive regulations

AwSV Appendix 5 (re § 47(2)) and **Appendix 6** (re § 47(3))

Inspection times and intervals for facilities

	Appendix 5 - facilities outside protected areas and defined or provisionally secured flood plains				Appendix 6 - facilities in protected areas and defined or provisionally secured flood plains			
	Facilities[1), 2)]	Inspection times and intervals			Facilities[1), 2)]	Inspection times and intervals		
	Column 1	Column 2	Column 3	Column 4	Column 1	Column 2	Column 3	Column 4
Row 1		Prior to commissioning [3)] or following a significant alteration	Recurrent inspection [4), 5)]	Upon decommissioning of a facility		Prior to commissioning [3)] or following a significant alteration	Recurrent inspection [4), 5)]	Upon decommissioning of a facility
Row 2	Underground facilities with liquid or gaseous substances that are hazardous to water	A, B, C and D	A, B, C and D every 5 years	A, B, C and D	Underground facilities with liquid or gaseous substances that are hazardous to water	A, B, C and D[3)]	A, B, C and D every 30 months[4)]	A, B, C and D
Row 3	Aboveground facilities with liquid or gaseous substances that are hazardous to water, including fuel oil consumer installations	B, C and D	C and D every 5 years	C and D	Aboveground facilities with liquid or gaseous substances that are hazardous to water, including aboveground fuel oil consumer installations	B, C and D	B, C and D every 5 years	B, C and D
Row 4	Facilities with solid substances that are hazardous to water	In excess of 1 000 t	Underground facilities and outdoor facilities in excess of 1 000 t, every 5 years	Underground facilities and outdoor facilities in excess of 1 000 t	Facilities with solid substances that are hazardous to water	In excess of 1 000 t	Underground facilities and outdoor facilities in excess of 1 000 t, every 5 years	Underground facilities and outdoor facilities in excess of 1 000 t
Row 5	Facilities for handling substances that are hazardous to water in intermodal transport	In excess of 100 t of substances handled every working day	Facilities with over 100 t of substances handled every working day, every 5 years	Facilities with over 100 t of substances handled every working day	Facilities for handling substances that are hazardous to water in intermodal transport	In excess of 100 t of substances handled every working day	In excess of 100 t of substances handled every working day, every 5 years	In excess of 100 t of substances handled every working day
Row 6	Facilities with floating liquid substances	In excess of 100 m^3	In excess of 1 000 m^3, every 5 years	In excess of 1 000 m^3	Facilities with floating liquid substances	In excess of 100 m^3	In excess of 1 000 m^3, every 5 years	In excess of 1 000 m^3
Row 7	Biogas facilities in which fermentation substrates as per § 2(8) are used exclusively [6)]	In excess of 100 m^3	In excess of 1 000 m^3, every 5 years	In excess of 1 000 m^3	Biogas facilities in which fermentation substrates as per § 2(8) are used exclusively [6)]	In excess of 100 m^3	In excess of 1 000 m^3, every 5 years	In excess of 1 000 m^3
Row 8	Facilities for drawing off and handling, and facilities for loading and unloading ships	B, C and D	B every 10 years; C and D every 5 years	B, C and D	Facilities for drawing off and handling, and facilities for loading and unloading ships	B, C and D	B, C and D, every 5 years	B, C and D

[1)] Letters A, B, C and D used in the table relate to the hazard levels of the facilities to be inspected pursuant to § 40(1).

[2)] The data relating to volume and mass included in the table relate to the decisive volume or mass of the substances that are hazardous to water (§ 40) which are handled in the facility.

[3)] The commissioning test and inspection following a significant alteration of facilities for drawing off and handling includes a repeat examination of the areas used for drawing off or handling after 1 year of operation. The repeat examination does not defer the date of completion of the inspection prior to commissioning.

[4)] The deadlines for the recurrent inspections begin with the completion of the inspection prior to commissioning or following a significant alteration as per column 2.

[5)] In order to maintain the deadlines for the recurrent inspections, it is sufficient to perform the inspections by the end of the month in which they are due.

[6)] The decisive volume of a biogas facility within the meaning of § 40().

Appendix 4

HWSA Closure Plan

Hazardous Waste Storage Area Closure Plan

1. Introduction

This closure plan has been developed for the Hazardous Waste Storage Area in Building 3371, Kelley Barracks in order to minimize or eliminate post-closure escape of HW, hazardous constituents, leachate, contaminated runoff, or HW decomposition products to the ground, surface water, or atmosphere. Closure refers to the shut down of an active HW accumulation and storage facility that is in operation since 2000.

Table A-4.1 outlines the regular generated HW streams and the available storage containers. The storage capacity varies upon military missions and residents' activities.

Table A-4.1 Regular HW Streams

HW Type	EWC	Container Size	Hazardous Properties
Batteries dry-cell	160605	30-120 l	Irritant
Batteries lithium	200133	30 -120 l	Flammable, Irritant
Batteries lead-acid	160601	670 l	Corrosive
Compressed Gas Cylinders	160504	Depends on cylinder	Depends on gas type
Batteries Ni-Cd	160602	30-120 l	Corrosive
Pesticides liquid	020108	30-120 l	Danger to the Environment, Toxic
Pesticides solid	020108	30-120 l	Danger to the Environment, Toxic
Inorganic acids	060106	30-120 l	Corrosive
Pesticides aerosols	160504	120 l	Flammable, Toxic
Bases	060205	30-120 l	Corrosive
Light tubes/lamps	060404	500 l	Irritant
Detergents	070608	30-120 l	Irritant
Paint	080111	800 l	Flammable, Irritant
Adhesives	080409	30-120 l	Flammable
Waste fuel	070604	30-120 l	Danger to the Environment, Flammable
Grease	120112	30-120 l	Irritant
Waste oil	130205	1000 l	Flammable, Danger to the Environment
Solvents halogenated	070604	30-120 l	Flammable, Toxic

HW Type	EWC	Container Size	Hazardous Properties
Solvents non-halogenated	070604	30-120 l	Flammable
Contaminated Containers metal	150110	800 l	Flammable
Contaminated Containers plastic	150110	800 l	Flammable
POL contaminated solids	150202	30-120 l	Flammable, Danger to the Environment
Brake fluid	160113	30-120 l	Irritant, Corrosive
Antifreeze	160114	30-120 l	Irritant
Aerosol cans	160504	120 l	Flammable, Toxic
Gas Cartridges	160504	120 l	Flammable
PU-foam aerosols	160504	120 l	Flammable
Lab packs	180107	30-120 l	Danger to the Environment, Toxic

2. Hazardous Waste Removal/Decontamination

The HWSA is an above ground facility, regulated by the Ordinance on Handling of Water Endangering Substances in Germany (Verordnung über Anlagen zum Umgang mit wassergefährdenden Stoffen – AwSV). The HWSA is equipped with permitted HW container racks, as shown in the manufacturer's specification (under a so called "Bauartzulassung"). The shut down procedure does not require the inspection by an expert (Sachverständiger).

The facility has impermeable flooring as well as a retention sump. Soil samples will be taken if the historical evaluation of the site reveals the evidence of spills or leaks. Background samples, in areas upgradient from the accumulation site, will also be collected. Any contaminated soil will be removed and transported to a permitted HW facility using the appropriate equipment.

All containers will be closed and labeled prior to shipment. Containers will be picked-up through hazardous waste contractors under the actual DLA disposal contract.

The HWSA is closed in accordance with the closure plan for the specific site. All hazardous waste and hazardous waste residues from the containment system are removed. This includes removing any remaining containers, liners, and bases. The closure is performed in a manner which minimizes and/or eliminates the need for future maintenance or the potential for future releases of hazardous waste.

At closure of a tank system, storage tanks are emptied and cleaned by a certified company *(Fachbetrieb)* prior to it being inspected by a certified expert *(zugelassener Sachverständiger)*. Hazardous waste residues, contaminated containment system components (liners, etc.), contaminated soils are disposed of to the extent practicable.

3. Expected Closure Date

Currently no closure date exists. This closure plan will be implemented concurrent with the decision to close the HWSA. All information regarding the closure procedures and analytical data will be maintained by the ED.

Appendix 5

Example Inspection Checklists and Forms

HAZARDOUS SUBSTANCES CHECKLIST

Building / Area: Date:

Inspector: Unit:

1. Mark the number of containers for each substance below:

Diesel Fuel	MOGAS	Jet Fuel	Motor Oil	Lube/Hydraulic Oil	PCB-containing Fluids	Solvents	Alcohols	Corrosive Liquids	Lead Acid Batteries	Toxic/Corrosive Gases	Flammable Gases	Aerosol Cans	Adhesives	Deicing Fluid	Antifreeze	Used Oil	Hazardous Waste	Other (Identify Below)

	YES	NO	N/A
2. Have containers been located to avoid accidental damage from equipment or vehicles?	☐	☐	☐
3. Are all containers adequately/appropriately labeled?	☐	☐	☐
4. Is the labeling on each container in English and German?	☐	☐	☐
5. Are incompatible substances segregated into separate storage cabinets/areas?	☐	☐	☐
6. Are any containers severely damaged (i.e., bulges, dents, rust, cracks)?	☐	☐	☐
7. Have all personnel involved in using hazardous substances been trained?	☐	☐	☐
8. Are SDSs available for each substance located in the room/area?	☐	☐	☐
9. Are any containers leaking?	☐	☐	☐
10. Are containers located outdoors surrounded by containment systems?	☐	☐	☐
If yes, are these containment systems dry?	☐	☐	☐
Is the water release system closed (valve) or in place (drain plug)?	☐	☐	☐
11. Is an inventory of hazardous substances maintained?	☐	☐	☐
12. Is each area used for storage of flammable liquids operated in accordance with state-of-the-art technology?	☐	☐	☐
13. Is the facility avoiding storing flammable liquids in passageways/ thoroughfares, staircases, and generally accessible hallways?	☐	☐	☐
14. Is the facility avoiding storing flammable liquids in roofs of residential buildings, hospitals, office buildings and similar buildings as well as in their roof-spaces?	☐	☐	☐
15. Is the facility avoiding storing flammable liquids in public restaurants and residences?	☐	☐	☐
16. Is the facility where flammable liquids are handled and/or stored in an adequate operating condition and continuously monitored?	☐	☐	☐
17. Are flammable liquids stored in a manner that:	☐	☐	☐
Prohibits electrostatic charges that could lead to a dangerous discharge?	☐	☐	☐
Protects against fire hazards due to lightning (indoors and outdoors)?	☐	☐	☐
Prevents hazardous vapor-air mixtures from forming/remaining during filling operations?	☐	☐	☐
Prohibits dangerous flashovers?	☐	☐	☐

HAZARDOUS SUBSTANCE CHECKLIST -- CONTINUED

	YES	NO	N/A
18. Are substances that may increase the risk, or the spread of fires prohibited from areas where an explosive atmosphere may be generated?	☐	☐	☐
19. If a known explosive atmosphere exists, is all equipment operated in it explosion proof?	☐	☐	☐
20. If the facility is storing, distributing, and/or handling water endangering substances (WGK 1 to WGK 3), is it being operated to prevent the contamination of water bodies or other detrimental effects?	☐	☐	☐
21. Is a 24-hour notification system available to contact emergency service providers?	☐	☐	☐
22. Is each storage area (i.e., room, cabinet) secured from unauthorized entry?	☐	☐	☐
If yes to 22., provide explanation of security (i.e., fences, locks, monitor, etc.):			

E. Other Comments:

F. Corrective Actions (for each non-compliant item, please describe type and completion date of corrective actions)

Yes: Compliance No: Non-Compliance N/A: Not Applicable

HWSA/HWAP CHECKLIST

Building / Area: Date:

Inspector: Unit:

HWAP/HWSA	YES	NO	N/A
1. Is each waste stream stored in a separate container (i.e., not co-mingled)?	☐	☐	☐
2. Are all waste containers adequately/appropriately labeled?	☐	☐	☐
3. Are Incompatible wastes segregated?	☐	☐	☐
4. Mark the number of containers for each waste stream below:			

Used Oil	Antifreeze	Used Oil Filters	POL-contaminated solids	POL-contaminated absorbents	Paint-related Waste	Corrosive Containers	Aerosol Cans	Batteries				Other (Identify Below)
								Lead Acid	Nickel-Cadmium	Gel Cell	Other	

5. Are any containers full?	☐	☐	☐
If yes to 5., list the waste type and the length of time the container has been stored full:			
6. Have all personnel involved in HW at the HWAP/HWSA been trained?	☐	☐	☐
For any location for which there is more than one container for collection of a particular waste stream, complete the following information (HWSA).			
7. Is there a HWPS on file for each waste stream stored in the area?	☐	☐	☐
8. Is this area secured from unauthorized entry	☐	☐	☐
If yes to 8., provide explanation of security (i.e., fences, locks, monitor, etc.):			
Are signs posted that say “Danger. Unauthorized Personnel, Keep Out”?	☐	☐	☐
If yes, are the signs in English and German?	☐	☐	☐
Are the signs visible from 25 feet?	☐	☐	☐
Can you see the signs from any side of the HWSA?	☐	☐	☐
9. Is the HWSA equipped with any alarm or emergency communication device?	☐	☐	☐
10. Are there occasions when only one person is working in the area?	☐	☐	☐
If yes to 10., does that person have immediate access to a cell phone or two-way radio (or any other appropriate device that will allow for summoning assistance)?	☐	☐	☐
11. Are all containers closed (unless adding waste)?	☐	☐	☐
12. Is adequate secondary containment provided for liquid wastes?	☐	☐	☐
13. Is a written log of the hazardous waste maintained?	☐	☐	☐

E. Other Comments:

F. Corrective Actions (for each non-compliant item, please describe type and completion date of corrective actions)

Yes: Compliance No: Non-Compliance N/A: Not Applicable

DAILY HAZARDOUS SUBSTANCE/WASTE TANK CHECKLIST

Building / Area: Date:

Inspector: Unit:

	YES	NO	N/A
1. Are operating instructions clearly visible for each hazardous substance/waste storage tank system?	☐	☐	☐
2. Are all tank specifications (i.e., capacity, construction type, contents) clearly indicated on each tank system?	☐	☐	☐
3. Is the labeling on each tank in English and German?	☐	☐	☐
4. Is each indoor storage area containing one or more tanks (that require permitting or notification) adequately lighted and ventilated?	☐	☐	☐
5. Is the fill level visible for each tank and tank container from its' exterior?	☐	☐	☐
6. Is data from monitoring and leak detection equipment gathered daily?	☐	☐	☐
7. If the tank has an internal positive pressure exceeding 0.1 bar, is monitoring being performed?	☐	☐	☐
8. Is any portion of the tank system damaged (i.e., bulges, dents, rust, cracks)?	☐	☐	☐
9. Is any portion of the tank system leaking?	☐	☐	☐
10. Are POL storage tanks surrounded by containment systems?	☐	☐	☐
If yes, are these containment systems dry?	☐	☐	☐
Is the water release system closed (valve) or in place (drain plug)?	☐	☐	☐
11. Are the areas immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, in good condition, including nearby vegetation (i.e., not dead, or wet during dry weather)?	☐	☐	☐
12. Is each tank system used for storage of flammable liquids operated in accordance with state-of-the-art technology?	☐	☐	☐
13. Are Hazard Class A I, A II, or B flammable liquids not stored in adjoining chambers of a multiple chamber tank to light heating oil?	☐	☐	☐
14. Is each storage tank secured from unauthorized entry/transfer?	☐	☐	☐
If yes to 13, provide explanation of security (i.e., locks, monitor, pump deactivation, etc.):			
15. Is a 24-hour notification system available to contact emergency service providers?	☐	☐	☐

E. Other Comments:

F. Corrective Actions (for each non-compliant item, please describe type and completion date of corrective actions)

Yes: Compliance No: Non-Compliance N/A: Not Applicable

USAG Stuttgart HAZARDOUS MATERIAL/HAZARDOUS WASTE (HM/HW) ENVIRONMENTAL PERFORMANCE ASSESSMENT and ASSISTANCE SYSTEM (EPAAS) CHECKLIST – INTERNAL EPAAS FY24

Installation Type/Facility	
Unit/Activity	Building No.
Assessment Date	Time.
Unit Chief	Telephone No.
Unit Primary EO	Telephone No.
Unit Alternate EO	Telephone No.
Assessor	Telephone No.

Note: These Final Governing Standards (FGS) were developed by comparing and adopting the more protective requirements of the United States (U.S.) Department of Defense (DoD) Overseas Environmental Baseline Guidance Document (OEBGD) and German national and state (Land) environmental laws and regulations, and applicable international agreements.

1. ADMINISTRATIVE:	**YES**	**NO**	**N/A**
1.1 Has the unit appointed on orders an environmental officer (EO) and a waste management officer?	☐	☐	☐
1.2 Has the EO received formal environmental management training? (EO online training not mandatory)	☐	☐	☐

	Unit Primary EO	Unit Alternate EO
Duty Appointment Date:		
Training Certificate Date:		
Valid until:		

1.3 Has maintenance personnel been trained on proper handling of HAZMAT, how to dispose of hazardous waste and spill procedures? (*FGS Chapters C5.3.10 (DODI 6050.05 "DoD Hazard Communication (HAZCOM) Program"); C5.3.10.1 (annual verbal instruction ("Unterweisung")), C9.3.6 (annual personnel training)*) Verify date, content and signature of annual verbal instruction ("*Unterweisung*"; FGS Chapter C5.3.10.2).	☐	☐	☐
1.4 Does the EO maintain a file with appointment orders, training records, and assessment records? (AR-200-1)	☐	☐	☐
1.5 Have all personnel handling hazardous materials received awareness training? - Date of record? - Valid until	☐	☐	☐
1.6 Does the unit have an environmental standard operating procedure (SOP) including Environmental Procedures?	☐	☐	☐

1.7	Does the unit have Personal Protective Equipment (PPE) and Spill Kits? (*FGS* Chapters C18.3.2.11. C5.3.5.9., C6.3.3.7.5)	☐	☐	☐
1.8	Does the unit have the latest version of the Garrison Spill Prevention and Response Plan (SPRP) readily available? (FGS Chapters C6.3.6 and C18.3.1)	☐	☐	☐
1.9	Are emergency telephone numbers posted at strategic locations?	☐	☐	☐
1.8	Does the unit have the latest version of the Garrison Hazardous Waste Management Plan (HWMP) readily available?	☐	☐	☐

2. HAZARDOUS MATERIALS / HAZARDOUS MATERIAL STORAGE AREA (HMSA):		**YES**	**NO**	**N/A**
2.1	Are hazardous materials stored by hazard classification (toxic, flammable, oxidizer and corrosive)? (*FGS* Chapters C5 and C6.3.3.)	☐	☐	☐
2.2	Do storage areas provide protection from the weather? (*FGS Chapters C5.3.15.2.4.1.1, C5.3.15.2.4.1.2, and Appendix C5.A5.1.2*)	☐	☐	☐
2.3	Do storage areas for hazardous liquids have secondary containment? (*FGS Chapters C5.3.14.1.1, C6.3.4.2, C9.3.2.2, and C18.2.12*)	☐	☐	☐
2.4	Does the secondary containment meet the rules in size and material? (*FGS Chapters C5.3.14.1.1, C9.3.2.2, C18.2.12, and Appendix C5.A5.1)*	☐	☐	☐
2.5	Are the HMSA clean and do not show any signs of leaking or spillage? (FGS Chapter C5.3.2 and C6.3.7.2)	☐	☐	☐
2.6	Is the Red Plan / Emergency Numbers posted (*FGS Chapters C18.3.2.9, 18.3.2.11, and 18.3.4*)	☐	☐	☐
2.7	Are the Operating Instructions ("*Betriebsanweisungen*") available and properly posted (FGS Chapter C18.3.1)?	☐	☐	☐
2.8	Is a spill kit readily available? Up-to date? Complete?	☐	☐	☐
2.9	Are fire extinguishers mounted in the HMSA (when flammable substances stored) and/or appropriate fire equipment and protection are readily available? Expiration date?	☐	☐	☐
2.10	Are Emergency Shower / Eye-wash / PPE readily available? Up-to date? Clean?	☐	☐	☐
2.11	Is the HMSA ventilated?	☐	☐	☐
2.12	Does the unit maintain an accurate and current inventory of hazardous substances in the workplace? (*FGS Chapters C5.3.4 and C18.3.2.4.)*	☐	☐	☐

2. HAZARDOUS MATERIALS / HAZARDOUS MATERIAL STORAGE AREA (HMSA):	**YES**	**NO**	**N/A**
2.13 Are storage areas secured / locked when not in use? Is unauthorized entry/access effectively prevented (FGS Chapter C5.3.11)?	☐	☐	☐
2.14 Is an adequate security or surveillance system installed, operational? (FGS Chapter C6.3.3.4.2.1)	☐	☐	☐
2.15 Are storage areas secured against flooding? (*FGS* Chapter C5.3.14.1.4.2)	☐	☐	☐
2.16 Are storage areas located in a water protection zone? (FGS Chapter C5.3.14.1.4.1)	☐	☐	☐
2.17 Are HM containers kept closed unless dispensing for immediate use?	☐	☐	☐
2.18 Are only authorized storage areas being used within the unit? (e.g., *FGS Chapter C5.3.14.5.3 (e.g., toxic and very toxic materials accessible by qualified personnel "(fachkundige Person") only*)	☐	☐	☐
2.19 Is toxic HM properly stored and secured?	☐	☐	☐
2.20 Is ventilation of Safety Cabinets provided?	☐	☐	☐
2.21 Are the Safety Cabinets yearly inspected by an expert ("Sachverständiger"/ "Sachkundiger")?	☐	☐	☐
2.22 Are the containers grounded during transfer of flammable liquids (FGS Chapter C6.3.4.1.3.3)? Flammable HM protected from sources of ignition (e.g., heating, welding, open flames, etc.)?	☐	☐	☐
2.23 Are compressed gas cylinders adequately secured to prevent mechanical damage (e.g., stored upright and secured to prevent toppling)? (*FGS Chapter C5.3.17.1.5*)	☐	☐	☐
2.24 Are compressed gas cylinders in use properly secured to a handcart to prevent toppling? (*FGS Chapter C5.3.17.1.5*)	☐	☐	☐
2.25 Are compressed gas cylinders for flammable gases adequately secured in special protection areas ("Schutzbereiche")? (*FGS Chapter C5.3.14.1.5.2*)	☐	☐	☐
2.26 Are the Safety Data Sheets (SDS's; former MSDS) available at the workplace / storage area? (*FGS Chapters C5.3.5 and C5.3.6*)	☐	☐	☐
2.27 Verify that all HM have a Hazardous Chemical Warning Label.	☐	☐	☐
2.28 Are mandatory hazard warning signs posted at workplaces where HM are handled and/or stored*? (FGS Chapter C5.3.7; C5.2.16 & Appendices C5.A1 & C5.A2 (Hazard Pictograms ("Gefahrenpiktogramme") and FGS Chapter C5.2.17 & Appendix C5.A3 (Hazard Signs ("Warnzeichen"))*	☐	☐	☐

2. **HAZARDOUS MATERIALS / HAZARDOUS MATERIAL STORAGE AREA (HMSA):**	YES	NO	N/A
2.29 Is expired HM stored?	☐	☐	☐
2.30 Verify that areas where flammable materials are stored and/or handled are labeled with “No smoking or open flame – Rauchen und offense Feuer verboten” signs (FGS C5.3.14.1.5.3)?	☐	☐	☐

3. **MAINTENANCE AREAS:**	YES	NO	N/A
3.1 Are maintenance areas clean and free of spills?	☐	☐	☐
3.2 Are vehicles being serviced using drip pans and absorbent materials for spills? (*FGS Chapter C5.3.2*)	☐	☐	☐
3.3 Do maintenance areas have appropriate safety equipment for handling HAZMAT and cleanup of spills? Spill kit: Up-to date and complete?	☐	☐	☐
3.4 Do maintenance areas have clearly labeled containers for used and un-used absorbent? (*FGS Chapter C5.3.7.1*). Labels should be in **English** and **German** language (*FGS Chapter C5.3.7.2*)	☐	☐	☐
3.5 Are bins being properly used for absorbent materials and oily rags? (*FGS Chapter C6.3.4.1.*)	☐	☐	☐
3.6 Are containers for oily rags made out of metal with a securely fitting lid? (*FGS Chapter C6.3.4.1.*)	☐	☐	☐
3.7 Are solvents tanks, sieves and funnels clean, free of dirt, and closed when not in use?	☐	☐	☐
3.8 Has personnel been trained in proper use of tanks, how to read the gauges, what to do when an alarm sounds, and who to call to repair or empty tanks?	☐	☐	☐
3.9 Are oil and antifreeze tanks clearly labeled, clean and free of dirt and debris? (*FGS Chapter C5.3.7.*)	☐	☐	☐
3.10 Are the tanks being used for that particular product only, and closed when not in use?	☐	☐	☐
3.11 Are reportable spills being reported to supervisor? (*FGS Chapter C18.3.3.2*)	☐	☐	☐
3.12 Are drains free of hazardous substances?	☐	☐	☐
3.13 Are compressed gas cylinders adequately secured to prevent mechanical damage (e.g., stored upright and secured to prevent toppling)? (*FGS Chapter C5.3.17.1.5*)	☐	☐	☐

3. **MAINTENANCE AREAS:**	YES	NO	N/A
3.14 Are good (new) vehicle batteries being stored separate from the bad (old/used) ones?	☐	☐	☐

4. **HAZARDOUS WASTE / HAZARDOUS WASTE ACCUMULATION POINTS (HWAP):**	YES	NO	N/A
4.1 Is the HWAP (according to FGS Chapter C6.2.18) properly secured and locked?	☐	☐	☐
4.2 Is the entrance to the HWAP unblocked?	☐	☐	☐
4.3 Is the Hazardous Waste Accumulation Point (HWAP) marked with HAZARDOUS WASTE?	☐	☐	☐
4.4 Are HWAP clean, orderly and do not show any signs of leaking or spillage?	☐	☐	☐
4.5 Is the HWAP ground sealed (no cracks, damages, etc.) and/or contained?	☐	☐	☐
4.6 Are HWAP sumps clean, free of water and debris?	☐	☐	☐
4.7 Are HWAP inspections conducted and documented? Are the Inspection LOGs available and current?	☐	☐	☐
4.8 Are waste containers clearly and properly labeled? (*FGS Chapters C6.3.2.1 and C6.3.4.1.4*)? Are hazard warning signs posted*? (FGS Chapters C5.3.7; C5.2.16 & Appendices C5.A1 & C5.A2 (Hazard Pictograms (“Gefahrenpiktogramme”) and FGS Chapter C5.2.17 & Appendix C5.A3 (Hazard Signs (“Warnzeichen”))*	☐	☐	☐
4.9 Are containers positioned so that the labels can be easily read?	☐	☐	☐
4.10 Do personnel know what is to be placed in the waste collection drums?	☐	☐	☐
4.11 Are HW and containers in good condition, free of severe corrosion, bulging, rupture and structural defects that could result in a leak or spill? (*FGS Chapters C6.3.4.1.1 and C6.3.4.1.3.2*)	☐	☐	☐
4.12 Are all HW containers tightly closed if not in use? (*FGS Chapter C6.3.4.1.3.1*)	☐	☐	☐
4.13 Are containers used to store HW compatible with the material stored? (FGS Chapter C6.3.4.1.2)	☐	☐	☐
4.14 Are the containers grounded during transfer of flammable liquids (FGS Chapter C6.3.4.1.3.3)? Flammable HW protected from sources of ignition (e.g., heating, welding, open flames, etc.)?	☐	☐	☐

4. HAZARDOUS WASTE / HAZARDOUS WASTE ACCUMULATION POINTS (HWAP):	**YES**	**NO**	**N/A**
4.15 Is HW properly segregated? (*FGS Chapter C6.3.2.1*)	☐	☐	☐
4.16 Is Hazardous Waste kept segregated from Hazardous Material?	☐	☐	☐
4.17 Do all HW storage containers have secondary containment? (*FGS Chapters C6.3.4.2 and C18.2.12*)	☐	☐	☐
4.18 Does the secondary containment meet the rules in size and material? (*FGS Chapters C5.3.14.1.1, C6.3.4.2, C18.2.12, and Appendix C5.A5.1)*	☐	☐	☐
4.19 Does the unit have the latest version of the Garrison Spill Prevention and Response Plan (SPRP) readily available (FGS Chapters C6.3.6 and C18.3.1)? Are Emergency Numbers properly posted?	☐	☐	☐
4.20 Does the unit have the latest version of the Garrison Hazardous Waste Management Plan (HWMP) readily available?	☐	☐	☐
4.21 Is a spill kit readily available? Up-to date? Complete?	☐	☐	☐
4.22 Are fire extinguishers mounted in the HWAP (when flammable substances stored)?	☐	☐	☐
4.23 When 75% of the container(s) are full is it reported to the Environmental Division for pick-up/disposal?	☐	☐	☐
4.24 Personnel assigned HWAP duty must complete appropriate HW training, including pertinent waste handling and emergency response procedure (FGS Chapter C6.3.2.5).	☐	☐	☐

5. MOTORPOOL AREAS:	**YES**	**NO**	**N/A**
5.1 Are authorized drip pans being used for all tactical vehicles? (*FGS Chapter C5.3.2*)	☐	☐	☐
5.2 Are drip pans empty?	☐	☐	☐
5.3 Do parking areas have absorbent materials and equipment available for spill clean ups? Up-to date? Complete?	☐	☐	☐
5.4 Are all vehicles free of stored hazardous materials?	☐	☐	☐
5.5 Are all vehicles washed in designated areas?	☐	☐	☐
5.6 Are Waste Accumulation Points being kept clean and empty?	☐	☐	☐
5.7 Does the unit have the latest version of the Garrison Spill Prevention and Response Plan (SPRP) readily available? (FGS Chapters C6.3.6 and C18.3.1) Are Emergency Numbers properly posted?	☐	☐	☐

5.8	Does the unit have the latest version of the Garrison Hazardous Waste Management Plan (HWMP) readily available?	☐	☐	☐
5.9	Are reportable spills being reported to the supervisor? (*FGS Chapter C18.3.3.2*)	☐	☐	☐

6. <u>WASTE OIL</u> **<u>Aboveground Storage Tanks (AST) / Underground Storage Tanks (UST)</u>**		**YES**	**NO**	**N/A**
6.1	Is the UST detection system operational?	☐	☐	☐
6.2	AST / UST (allowable) fill level checked? (FGS Chapter C5.3.15.2.1)	☐	☐	☐
6.3	Is the grate free of solids (absorbent, rags, metal parts, etc.)?	☐	☐	☐
6.4	Check the grate conditions for holes, damages, etc.?	☐	☐	☐
6.5	Is the filling area clearly labeled?	☐	☐	☐
6.6	Is the filling area free from drip pans, oil filters, cans, trash, etc.?	☐	☐	☐
6.7	Ground/floor under sink clean, no spills?	☐	☐	☐
6.8	AST/UST inspected every business day and documented? (FGS Chapter C6.3.7.1.2)	☐	☐	☐
6.9	Are reportable spills being reported to the supervisor? (*FGS Chapter C18.3.3.2*)	☐	☐	☐
6.10	Does the unit have the latest version of the Garrison Spill Prevention and Response Plan (SPRP) readily available? (FGS Chapters C6.3.6 and C18.3.1) Are Emergency Numbers properly posted?	☐	☐	☐
6.11	Is the leaflet on water-endangering substances posted?	☐	☐	☐

7. <u>AIR EMISSION</u>		**YES**	**NO**	**N/A**
7.1	Are solvent cleaners used to clean the grease and oil off of parts so they can be worked on?	☐	☐	☐
7.2	Does the solvent drain down into a closed container?	☐	☐	☐
7.3	Are parts drained before removing them from the degreaser?	☐	☐	☐

8. WASTE WATER	**YES**	**NO**	**N/A**
8.1 Is a copy of the Storm Water Pollution Prevention Plan available?	☐	☐	☐
8.2 Is the motor pool ground visually POL contaminated?	☐	☐	☐
8.3 Do motor pool drains lead to an oil water separator?	☐	☐	☐
8.4 Are all vehicles free of stored hazardous materials?	☐	☐	☐
8.5 Are all vehicles washed in designated areas?	☐	☐	☐
8.6 Are vehicles washed proper designed wash rack	☐	☐	☐
8.7 Are solvents and cleaners observed being used at vehicle wash rack?	☐	☐	☐

9. SOLID WASTE	**YES**	**NO**	**N/A**
9.1 Is the Garrison recycling booklet available (known)?	☐	☐	☐
9.2 Are hazardous wastes disposed of in the regular trash?	☐	☐	☐
9.3 Is the proper disposal of used tires known?	☐	☐	☐
9.4 The evidence of recycling (bins for cans, paper, glasses, etc.)?	☐	☐	☐
9.5 Is motor pool personnel regularly informed about materials that are prohibited from disposal in solid waste receptacles?	☐	☐	☐
9.6 Did trash pile up on the ground near the dumpster?	☐	☐	☐
9.7 Is the number of dumpsters sufficient?	☐	☐	☐

10. Corrective Action Request (CAR):		
Identification of Nonconformity(ies) to the Environmental Management System	**Picture:**	**Status** (Corrective Action/Preventive Action effective):
The completion status of the past observations during internal EPAAS FY24 are identified as followed: The following status was identified in accordance with question _____: Immediate action(s) taken to mitigate environmental impacts: _____ Suggested and selected further action(s) to mitigate to avoid recurrence: _____ Description of Root Cause and Analysis: _____ Recommendation: _____		
The following status was identified in accordance with question _____: Immediate action(s) taken to mitigate environmental impacts: _____ Suggested and selected further action(s) to mitigate to avoid recurrence: _____ Description of Root Cause and Analysis: _____ Recommendation: _____		
The following status was identified in accordance with question _____:		

Immediate action(s) taken to mitigate environmental impacts: _____ Suggested and selected further action(s) to mitigate to avoid recurrence: _____ Description of Root Cause and Analysis: _____ Recommendation: _____		
The following status was identified in accordance with question _____: Immediate action(s) taken to mitigate environmental impacts: _____ Suggested and selected further action(s) to mitigate to avoid recurrence: _____ Description of Root Cause and Analysis: _____ Recommendation: _____		

I have been briefed as to the findings stated above and will take appropriate actions to resolve all negative findings:	
Assessment POC (print Name)	Signature
Assessor 1 (print Name)	Signature
Assessor 2 (print Name)	Signature

Appendix 6

Hazardous Substances Compatibility Chart

Table A-6.1 Hazardous Substances Compatibility Chart

Storage Class (*LGK*)	Description
1	Explosive substances
2A	Compressed, liquefied, or dissolved gases under pressure
2B	Compressed gas packs (aerosol cans / spray cans)
3	Flammable liquids (flash point up to 55 ° C)
4.1A	Other potentially explosive substances
4.1B	Flammable solid hazardous substances
4.2	Pyrophoric or self-heating hazardous substances
4.3	Hazardous substances that form flammable gases in contact with water
5.1A	Strongly oxidizing hazardous substances
5.1B	Oxidizing hazardous substances
5.1C	Inflammatory products mentioned in groups A to C of TRGS 511.
5.2	Organic peroxides and self-reactive hazardous substances
6.1A	Flammable, acutely toxic cat. 1 and 2 / very toxic hazardous substances
6.1B	Non-flammable, acutely toxic cat. 1 and 2 / very toxic hazardous substances
6.1C	Flammable, acutely toxic cat. 3 / toxic or chronically acting hazardous substances
6.1D	Non-flammable, acutely toxic cat. 3 / toxic or chronic hazardous substances
6.2	Infectious substances
7	Radioactive materials
8A	Flammable, caustic hazardous substances
8B	Non-combustible, caustic hazardous substances
10	Flammable liquids unless LGK 3
11	Flammable solids
12	Non-flammable liquids
13	Solids not dangerous for fire

LGK	13	12	11	10	8B	8A	7	6.2	6.1D	6.1C	6.1B	6.1A	5.2	5.1C	5.1B	5.1A	4.3	4.2	4.1B	4.1A	3	2B	2A	1
1																								
2A																								
2B																								
3																								
4.1A																								
4.1B																								
4.2																								
4.3																								
5.1A																								
5.1B																								
5.1C																								
5.2																								
6.1A																								
6.1B																								
6.1C																								
6.1D																								
6.2																								
7																								
8A																								
8B																								
10																								
11																								
12																								
13																								

	Storage allowed
	Storage allowed with restrictions (for further details see TRGS 510)
	Storage prohibited

Appendix 7

Hazardous Waste Training Guidance

All personnel involved in HW handling, storage, and disposal must receive training before executing work duties involving HW exposure, and annually thereafter. The following table provides recommendations for training by activity and general position description.

Table A-7.1 Hazardous Waste Training Guidance

Activity Triggering Training Requirement	What Type of Training Is Required?	Who Must Receive Training?	When is Training Required?	Refresher Required ?	Length of Training?	References
Duties involving actual or potential exposure to hazardous waste	OSHA and Environmental Officer Training, covering sufficient information to enable personnel to perform assigned duties and fully comply with pertinent HW requirements on: • Emergency procedures • Emergency equipment, emergency systems; • Response to fire/explosion/spills; • Communications/alarm systems • Body and equipment clean up • Drum/Container Handling/ Storage • Personal Protective Equipment • Record keeping	All employees and supervisors involved in the handling or management of hazardous property: HW Handlers HW Technicians Environmental Protection Specialists HW Supervisors	Prior to assuming duties	8 Hour Annually	40 Hours Initial 3 Days of Supervised On-The-Job Training	FGS C6.3.10. 29 CFR 1910.120(e)(3)(i)
		Environmental personnel occasionally on site (spill investigators, treatment plant inspectors, land surveyors, groundwater monitoring personnel)		8 Hour Annually	24 Hours 1 Day of Supervised On-The-Job Training	29 CFR 1910.120(e)(3)(iii)
	RCRA Training	HW Supervisors HW Inspectors HW Coordinators / Assistant Coordinators	Prior to assuming duties un-supervised, and within six months of employment or assignment.	Annually	Not Defined	40 CFR 264.16/265.16

Table A-7.1 Hazardous Waste Training Guidance

Activity Triggering Training Requirement	What Type of Training Is Required?	Who Must Receive Training?	When is Training Required?	Refresher Required ?	Length of Training?	References
	Supervisor Training	HW Supervisors	Prior to assuming duties	No	OSHA 40- or 24-Hour training equivalent to employees plus 8- Hours specialized training	29 CFR 1910.120(e) (4)
Emergency Response	Level I First Responder - Awareness Level	HW Handlers HW Technicians Personnel in and Around HW/HW (not including Treatment, Storage, and Disposal Facilities)	Prior to assuming duties	Annually	Not Defined	29 CFR 1910.120 (q) 6 (i)
	Level II First Responder Operations Level	Spill Responders	Prior to assuming duties	Annually	8 Hours	29 CFR 1910.120 (q) 6 (ii)
	Level III HM Technicians	Fire Department, First Responder	Prior to assuming duties	Annually	24 Hours	29 CFR 1910.120 (q) 6 (iii)
	Level IV HM Specialist	Asst. HM Technicians	Prior to assuming duties	Annually	24 Hours	29 CFR 1910.120 (q) 6 (iv)
	Level V On Scene Incident Commander	Incident Commanders who control a spill/emergency response scene	Prior to assuming duties	Annually	24 Hours	29 CFR 1910.120 (q) 6 (v)
Transportation of Dangerous Goods	HAZ 11	ADR Drivers	Prior to assuming duties	Valid for 5 years	40 Hours	AER 55-4, Section II, 8.
	HAZ 12	Checker and Certifier for dangerous goods transportation	Prior to assuming duties	Valid for 2 years	80 Hours	AER 55-4, Section II, 9.
	HAZ 15 (required in addition to HAZ 12)	Certifier for ADR transportation documentation on international public roads and railroads	Prior to assuming duties	Valid for 5 years	24 Hours	AER 55-4, Section II, 9 & 10.
	Ammo-43 Intermodal Dry Cargo Container/CSC Reinspection	Personnel who certify containers by placing a DD Form 2282 decal	Prior to assuming duties	Valid for 4 years	16 Hours	AER 55-4, Section II, 13.
	ADR Awareness Training	Dangerous Goods Advisor	Prior to assuming duties	Annually	Not Defined	AER 55-50, Section 9

HWMP TRAINING FORM - The following HWMP Training Form should be completed each time a training session related to the HWMP is performed. Participants should print their name, their unit or title, telephone extension, and then sign their name in the appropriate spaces provided below. The trainer should complete the upper portion of the form, including topic covered in addition to the general review of the plan and spill events.

Trainer:	**Date:**

If box check, this HWMP training session included a review and discussion of the following items:

☐ Each section contained within this HWMP,
☐ Equipment and components and/or,
☐ Recently developed or adopted precautionary measures or procedures.

Other topics and/or discussion items which were reviewed included the following:

Participant's Name	Unit/Title & Phone Extension	Participant's Signature

Trainer's Signature:

Appendix 8

Hazardous Waste Management Compliance Plan

Table A-8.1 Hazardous Waste Management Compliance Plan

ARLOC	Facility Number	Deficiency	Compliance Action	Completion Date	Cost Estimate	Project Number

Appendix 9

Hazardous Waste Audit Trail Instructions

USAG Stuttgart Hazardous Waste (HW) Audit Trail Instructions for Document Control

The German Final Governing Standards 2020, Chapter C6.3.1.4.3 require the maintenance of a Hazardous Waste Audit Trail from the point of generation to disposal.

In order to provide an audit trail the DPW Environmental Division (ED) is distributing the following documents to the HW generator(s)/unit EOs for **their file after the event of a HW pick-up:**

a. DD Form 1348-1A, Issue Release/Receipt Document ➔ Sample 1
b. DD Form 1155, Order for Supplies or Services (Delivery Order or D.O.) ➔ Sample 2
c. Hazardous Waste Acceptance Slip (German Übernahmeschein) ➔ Sample 3

a. DD 1348-1A READING INSTRUCTIONS (Sample 1):

Unit name/building number: listed underneath field 22

Contract number, D.O. number and Item number: listed on left top corner in field 24

Waste stream: described in field 17

b. DD 1155 (D.O.) READING INSTRUCTIONS (Sample 2):

Contract number: see field 1 on top of page 1

D.O. number: see field 2 on top of page 1

Item numbers: are listed in column 18 on page 1 and on the following pages on the left side of the document

Waste stream, quantity picked-up, manifest number (last 5 digits), and pick-up date are listed next to the pertaining item number

c. HW Acceptance Slips (Uebernahmeschein) READING INSTRUCTIONS (Sample 3):

Pickup date: in the middle of the document

Unit name and address: in the left middle box of the document

D.O. number and item number: see lower box of the document

Quantity picked-up: see field “Menge in t” (Quantity in metric tons)

WHAT TO DO after HW generator/unit EO receives the 1348-1A?

- ✓ Print out the 1348-1A
- ✓ Sign at your building/unit (under LOCATION/HW generators)
    - **Please note: sometimes more than one building is listed.**
    - **Only sign the building number which belongs to your unit.**
- ✓ Submit completed DD 1348-1A back to DPW ED:
    - e-mail: therese.mundorff.ln@army.mil

WHAT TO DO after HW generator /unit EO receives the Audit Trail Documents?

- ✓ Print out the DD 1155 (or only first and last page and those page(s) pertaining to your unit)
- ✓ Print out the HW Manifest(s)
- ✓ File the documents along with the pertaining 1348-1A in a binder

IMPORTANT: All documents must be kept on file for 3 years

Appendix 10

Hazardous Waste Analysis Plan

DEPARTMENT OF THE ARMY
UNITED STATES ARMY GARRISON - STUTTGART
UNIT 30401
APO AE 09107-0401

AMIM-SGP-E 8 February 2022

MEMORANDUM FOR HAZARDOUS WASTE STORAGE AREA MANAGER/ PERSONNEL

SUBJECT: USAG Stuttgart Hazardous Waste Analysis Plan (HWAP)

1. References:

a. Final Governing Standards Germany (G-FGS), C6.3.3.3.1, Sept 2020

b. Army in Europe Regulation (AER) 200-1, C6-5.b.(2), 2012

2. Purpose:

a. The purpose of this plan is to provide the Hazardous Waste Storage Area (HWSA) manager and HWSA personnel guidance on how and when to analyze Hazardous Waste. This plan provides procedures for characterization and verification testing of both on-site and off-site Hazardous Waste (HW). This memo serves as the plan and is included as an appendix to the USAG Stuttgart Hazardous Waste Management Plan.

3. Procedure for Waste Verification:

a. Generating activities will provide HWSA manager/personnel a Safety Data Sheet (SDS) for each waste stream that will be regularly generated during the processes at the activity. Additional SDS's will be provided if the nature of the waste streams will change or other products are used.

b. Before accepting the waste, HWSA Manager/personnel shall:

(1) Visually inspect the waste to ensure it matches the description provided.

(2) Ensure that no waste is accepted for storage unless a SDS is provided, or is available and properly referenced.

(3) Request a new or additional SDS from the generating activity if there is reason to believe that the nature of the generated waste has changed.

(4) Create and maintain Hazardous Waste Profile Sheets for each waste stream.

4. Procedure for turn in of Unknown Waste:

a. Initial identification of unknown wastes shall be based on generator's knowledge of the processes that created the waste and known or suspected physical, chemical, or other descriptive properties of the waste.

b. The Identification of Unknown Wastes disposal contract line item shall be applied to sample and analyze unknown wastes for applicable hazardous waste characteristic parameters.

c. Laboratory results shall classify the unknown waste for disposal facility acceptance and facilitate completion of a hazardous waste profile sheet.

5. Primary POC for this Plan is Ms. Therese Mundorff, HWSA Manager, USAG Stuttgart, DSN 596-6135, e-mail: therese.mundorff.ln@army.mil. Alternate POC is Ms. Simone Leiss-Wenzel, DSN 596-6134, e-mail: simone.leiss-wenzel.ln@army.mil.

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Date: 2022.02.09 10:39:16 +01'00'

Chief, Environmental Division
Directorate of Public Works