



	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 1 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

CONTENTS	SUBPART
PURPOSE	A
HAZARDOUS WASTE HANDLING AND STORAGE	B
TRAINING	C
CONTINGENCY PLAN & EMERGENCY PROCEDURES	D
FACILITY EMERGENCY EVACUATION PROCEDURES	E
MANAGEMENT OF HAZARDOUS WASTE CONTAINERS	F
MANAGING CONTAINERS AT 90 DAY AREAS	G


SUBPART A - PURPOSE

IT IS THE INTENTION OF Berry Bros. General Contractors, Inc (BBGCI) to conduct all of its operations in such a manner as to prevent any possible actions that may endanger or harm either human life or the environment.

Therefore, to convey management's commitment, this Hazardous Waste Management System has been developed to insure that our operations have little or no effect on the surrounding environment and strictly adheres with all applicable Federal, State, and Local regulations.

Berry Bros. General Contractors, Inc. is committed to:

- Developing and implementing Standard Operating Procedures (SOPs) that assure employees and community safety and protection of the environment.
- Maintain compliance with applicable environmental laws and regulations, as well as client and internal corporate policies and procedures.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 2 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		


- Develop and implement training programs to assure that employees receive an appropriate level of environmental, health and safety training, as well as job-specific skills training.

SUBPART B - HAZARDOUS WASTE HANDLING and STORAGE

This procedure has been established for all employees of BBGCI, who may, in carrying out their various job duties, be required to handle or store Hazardous Waste.

Failure to follow this policy will result in disciplinary action up to and including termination of employment.


1. When transferring paints, thinners or other hazardous materials, a funnel shall be used to avoid spilling any material on the ground.
2. When cleaning paint equipment, solvents used in the clean-up must be stored in a container designated for hazardous waste.
3. Spillage must be kept to a minimum; therefore, a drip pan or some other means should be used to prevent contamination of the ground or surrounding area.
4. Waste paint or contaminated paints will be placed in a container designated for hazardous waste. Paint cans will be emptied and cleaned out as much as possible before disposing of the can.
5. AT NO TIME shall paints, thinners, solvents or other hazardous materials be dumped on the ground or into the surrounding waterways, creeks, bayous of this facility or any worksite.
6. AT NO TIME will waste paints, thinners, rubber, plastic, wood or any trash be burned. All wastes whether hazardous or not will be disposed of in accordance with all Local, State, and Federal regulations.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 3 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

- Any paints that have dried out or become hard in their original containers will be removed from the container and disposed of in a container designated for hazardous waste. AT NO TIME will it be thrown into the waterways, creeks, bayous, or thrown into drums used for everyday trash. Once the dried paints have been removed from the cans, the cans may be thrown away.
- All used oils such as engine oil, hydraulic oil brake fluid, transmission fluids, etc. must be collected and put into a container designated USED OIL for recycling. Any other fluids in a used oil container will be considered contamination and will be deemed a serious violation.
- Old oil and fuel filters must be allowed to drain into a drip pan for a period of a few days to allow all used oils and fuels to drain out before disposing of the filters.
- Used anti-freeze must be stored in a container designated for hazardous waste.
- AT NO TIME will waste oils, fuels or anti-freeze be thrown onto the ground or into the surrounding waterways, creeks, or bayous, or into drums designated for normal everyday trash.
- Any spillage will be cleaned up immediately with absorbent materials (rags, pads, or granules) and disposed of in a container designated for solid waste.

SUBPART C - TRAINING

Employees involved in handling or storing wastes/hazardous wastes will receive training to ensure safe working conditions and efficient operations. Training must adequately prepare new employees to work with hazardous materials and must reinforce current employee's knowledge of safe operating practices. Training must also address emergency response information. All employees must be adequately trained to ensure that all operations are performed in a safe manner and in compliance with federal and state regulations.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 4 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

The following information outlines the general policy, which governs the training of material handling and management employees.

- The HS&E / Risk Management Director has overall responsibility for ensuring that appropriate training is conducted.
- Employees must complete the training appropriate to their responsibilities of their job before beginning work with hazardous materials. This training will consist of orientation training, on-the-job training, and annual refresher training.
- Training must be provided to new employees, current employees who have transferred to another job position or workplace, to current employees when the hazards particular to their job or workplace change and to current employees when operational procedures change.
- Training must adequately familiarize personnel with proper hazardous materials and management procedures, emergency procedures, and use of emergency equipment systems.
- An employee's supervisor is responsible for ensuring that the employee has learned and understands safety and operating procedures.
- All training conducted must be accurately documented including the supervisor on-the-job training.
- The training program must include provisions to allow for updates or reviews of the training program as necessary to ensure compliance.
- Copies of the training program must be kept on file for review by State and Federal regulatory officials.

SUBPART D - CONTINGENCY PLAN & EMERGENCY PROCEDURES



	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 5 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

PURPOSE

This plan is designed to help minimize hazards to human health or the environment from fires, explosions, or any unplanned, sudden or non-sudden release of HAZARDOUS WASTE constituents to the air, soil, or surface water.

EMERGENCY COORDINATOR


The General Superintendent is the Emergency Coordinator for BBGCI. As coordinator, he/she is responsible for coordinating all emergency response measures. He/she will be thoroughly familiar with all aspects of this Contingency Plan, all characteristics of waste handled, the location of all records, and the facility layout. In the absence of the General Superintendent, the yard foreman or supervisor onsite will act as the onsite coordinator, until the Emergency Coordinator or a designee arrives on the scene. Other individuals who may act as alternates are listed below. Each individual will be thoroughly familiar with the contents of the Facility Contingency Plan.

PRIMARY

NAME	HOME NUMBER	CELL NUMBER
Troy Lombardo	(985) 384-3236	(985) 637-8775

ALTERNATES

NAME	HOME NUMBER	CELL NUMBER
Joe'al Berry	(985) 399-5888	(985) 637-8770
Bert Berry	(985) 384- 8770	(337) 270-9222
Ricky Thibodeaux	(337) 364-6793	(985) 637-8776
Lloyd Aucoin	(985) 395-7407	(985) 397-0675
Ethan LeBlanc	(985) 384-1557	(985) 445-0344
TJ Freeman	(985) 384-8770	(985) 413-6855
Jeffery Daigle	(985) 448-0405	(985) 397-3493

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 6 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

IMPLEMENTATION

When there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health or the environment, the provisions of the plan must be carried out immediately.

EMERGENCY PROCEDURES

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator (EC) or his designee must immediately:


- Activate internal communication system(s) to notify all terminal personnel.
- Notify key Corporate Personnel.
- If outside assistance is required, notify appropriate Local or State agencies with the designated response role.

EMERGENCY ACTIONS

Specified actions to be taken in response to various incidents are:

Fire

- Sound the fire alarm
- Notify the fire department
- Initiate Site Evacuation Plan
- Move tractor/trailer equipment away from fire and make certain equipment does not block access to terminal by Fire and Emergency vehicles.
- Employ terminal firefighting equipment to contain or extinguish fire.
- Keep spectators at a safe distance from the area.
- Have qualified people attempt to reduce or stop released material.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 7 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

Explosion

- Follow same sequence for fire.

Unplanned


Sudden and/or non-sudden release of Hazardous Waste to air, soil, or surface water.

- Sound the Emergency Alarm
- If the material is on the ground, attempt to contain it by diking.
- Keep spectators at safe distance from the area.
- If toxic vapor, fumes or gas is released keep everyone upwind.
- If, because of flammable vapors, an explosion appears imminent, initiate Site Evacuation Plan.
- If material is soaking into the ground, cordon off the area and restrict access to only those engaged in the clean-up operation.

Whenever there is a release, fire or explosion, the EC must immediately identify the material. The EC must assess the possible hazards to human health or the environment. The EC must consider both direct and indirect effects of any toxic, irritating or asphyxiating gases or the effects of any hazardous surface water runoff from water or chemical agents used to control fire and / or heat induced explosions.

If it is determined there has been a release which could threaten human health or the environment, the **EMERGENCY COORDINATOR MUST REPORT ALL FINDINGS** as follows:

- If an evacuation is called, notify local authorities.
- Notify the following Governmental Agencies:
 - USEPA National Response Center 800-424-8802
 - LA Department of Environmental Quality
 - Hazardous Waste Division (8:00 – 5:00) (225) 765-0355
 - Emergency Response (8:00 – 5:00) (225) 765-2568
 - 24 Hour Number (225) 342-1234

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 8 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

Report to the above agencies the following information:

- Name and telephone number of person calling.
- Name and address of the facility.
- Time and type of incident (release, fire, explosion).
- Name and quantity of material involved to extent known.
- Extent of any damage or injuries if any.
- The possible hazards to human health or the environment, outside the facility.

During the emergency, the EC must take all reasonable measures to ensure that fires, explosions, and releases do not occur, reoccur or spread to other hazardous waste in the facility. These measures must include stopping processes and operations, collection and containing the released materials and removing or isolating containers. There must also be monitoring for leaks, pressure buildup, gas generation, or rupture in valves, pipes, and other equipment.


POST EMERGENCY PROCEDURES

The EC must provide for treating, storing or disposing of any recovered waste, contaminated soil or surface water, or any other material that resulted from a release, fire, or explosion at the facility.

The EC must ensure, that in the affected areas of the facility that:

- No waste, that may be incompatible with any released material is treated, stored, or disposed of until clean-up procedures are completed.
- All emergency equipment listed in the plan is cleaned and fit for its intended use.

The EC in conjunction with the HS&E / Risk Management Director must notify the Region USEPA Administrator, State and Local authorities that the facility is in compliance with the two previous bulleted statements before operations are resumed in the affected areas.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 9 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

The EC must note in the facility's operation record the time, date, and details of any incident that required implementation of this contingency plan. In addition, within fifteen (15) days after any incident, the EC must submit a written report to the Louisiana Department of Environmental Quality at:


P.O. Box 82263
 Baton Rouge, LA 70844-02263
 Attention: Hazardous Waste Division – Unauthorized Discharge Notification Report.

The report must include the following:

- Name, address, and telephone number of the company.
- Name, address, and telephone number of the facility.
- Date, time, and type of incident (fire, explosion, release, etc).
- Name and quantity of material involved.
- Extent of injuries, if any.
- Assessment of actual or potential hazard to human health or the environment.
- Estimated quantity and disposition of recovered material that resulted from the incident.

COORDINATING ACTIVITIES

- The layout of the facility
- Road entrances to the facility
- Emergency evacuation routes
- Normally occupied work plans inside the facility
- Properties of Hazardous Materials/Wastes handled at the facility, associated hazards and type of injuries and / or illnesses which could result from the incident.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 10 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

EMERGENCY AUTHORITIES CALL LIST

Local

Police Department	911
Fire Department	911
Ambulance	911
Hospitals	911

State and National

LA State Police Troop C	(800) 659-5907
LA Dept of Environmental Quality	(225) 765-0355
Emergency Response working hours	(225) 765-2568
24 Hour Hotline	(225) 342-1234
USEPA National Response Center	(800) 424-8802

Company

Troy Lombardo	
Home	(985) 384-3236
Cell	(985) 637-8775

For alternates see call list at EMERGENCY COORDINATOR.


SUBPART E - FACILITY EMERGENCY EVACUATION PROCEDURES

General

Evacuation of the facility will be carried out the EC or his/her designated person onsite.

Specific Escape Route Assignments

- Office – Evacuate to parking lot across River Road.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 11 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

- Shop – Same
- Yard – Same
- Vessel (BBGCI) – Same using the safest route to parking lot across River Road.
- Vessel (Customer) – Notification
- Yard Lessee if applicable - Notification

CRITICAL PROCEDURES TO CARRY OUT BEFORE EVACUATION

- All phones will put on night connection and dispatcher will remain if there is no immediate danger to him/her and man the telephone until emergency vehicles arrive. Once emergency vehicles arrive, the dispatcher will proceed to the designated assembly area.
- If anyone is needed to move units, they will be under the direction of the General Superintendent, EC or dispatcher.

ACCOUNTING FOR ALL EVACUATED PERSONNEL


The General Superintendent or EC will account for all employees at the designated assembly area and report this information to the fire chief on his arrival, if all employees are not accounted for.

ASSIGNMENT OF RESCUE AND MEDICAL DUTIES

Local emergency response teams.

PREFERRED MEANS OF REPORTING EMERGENCIES

- 0600 to 1700 (6:00 AM - 5:00 PM) – All emergencies will be reported to the General Superintendent or Vice President of Operations, who in turn will notify the local authorities as needed.
- 1700 to 0600 (5:00 PM – 6:00 AM) – the dispatcher on duty will notify the proper authorities and then contact the General Superintendent or Vice President of Operations.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 12 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

SUBPART F - MANAGEMENT OF HAZARDOUS WASTE CONTAINERS

Waste Characterization

To safely manage hazardous waste, one must know exactly what a waste is, how it will act, and what its properties are. Is the waste extremely toxic? Do workers need special protection? Is the waste corrosive, will it corrode certain types of containers? Is the waste incompatible with other wastes if mixed with another waste or water?

Once a waste is generated, it should be characterized, before it is placed in a waste container. Waste characterization can be done by either:


- Sampling and analyzing the waste.
- Identify the waste based on process knowledge.

Putting Wastes in Containers – Reactive or Incompatible Wastes

Through waste characterization, one can learn if a waste is reactive or incompatible with other wastes. Before putting wastes into a container it is necessary to identify and segregate wastes if they are incompatible and / or reactive. This is very important because incompatible and / or reactive hazardous wastes must be stored in a manner to prevent fires and explosions. See specific SDS sheet of that waste, if available, for more information.

The regulations state that incompatible wastes cannot be placed in the same container, unless you comply with other requirements found in s 265.17 (b). This prevents the wastes from reacting with each other (e.g. exploding or catching fire).

The regulations allow you to put incompatible wastes in the same container, under conditions found in s 265.17 (b) (WARNING: Always talk to your supervisor or environmental coordinator before mixing any materials or wastes"). If you have to

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 13 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

mix incompatible wastes in the same container you must make sure that the wastes won't react. This means that you must:

- Keep the wastes from becoming too hot to prevent fires or explosions.
- Keep the wastes from producing toxic and / or flammable mists, gases, fumes, or dust.
- Make sure that mixing the incompatible wastes won't damage the containers. The container won't rupture or bulge.
- Demonstrate that mixing the wastes won't threaten workers or the environment in any way.

Container Selection

Once the waste has been characterized and you know if the wastes are incompatible or reactive, then one can select an appropriate container.


When selecting a container, one must consider the amount of waste and type (characteristics) of the waste.

First you should consider the amount of waste you have. It makes more sense to put 20 to 25 gallons of waste into a 30 gallon drum rather than use a 55 gallon drum. On the other hand, a 55 gallon drum is better for storing contaminated gloves/coveralls.

When selecting the container you must make sure that a waste won't react with the container itself. For example, a highly corrosive waste will react with a steel drum. The drum may fail and the waste be released. Use plastics or plastic-lined, steel drums to safely store corrosive wastes. To prevent drum failure, it is important to "match" the right waste with the right container by referring to the SDS sheet.

Marking and Labeling Containers

Hazardous waste generators can only accumulate or store waste on-site for less than 90 days without a permit. **The 90 day limit starts the moment the container**

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 14 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

is full. If the facility is a small quantity generator and you are shipping wastes over 200 miles, then you can store the wastes up to 270 days. If less than 200 miles, you can store the waste up to 180 days.

You must be able to prove to inspectors that you have not exceeded the time limit for the accumulation.

The regulations require that you clearly mark on the container the date hazardous waste completely filled the container. In addition, you must clearly mark all containers holding hazardous waste with the words “**HAZARDOUS WASTE**”.

Besides the required markings, you will have to comply with all Department of Transportation (DOT) labeling requirements on the container before the waste can be shipped off site. The DOT label exactly identifies the waste, including name, characteristics and handling requirements.

SUBPART G - MANAGING CONTAINERS AT 90 DAY AREAS


The moment that waste is placed in the container, containers holding hazardous waste must be managed to prevent spills, fires, or explosions from occurring.

Keeping Containers in Good Condition

One of the easiest ways to prevent spills is make sure that containers are kept in good condition before the waste is put in the container and while you are managing the container. What does good condition mean?

- Containers must be free of dents and corrosion.
- Containers must not leak.
- Containers must not bulge.

If any of the above conditions are present, the waste must be transferred to another sound container in good condition.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 15 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

Managing Filled Containers

In order to keep containers in good condition the following must be done at a minimum:

- Keep containers closed at all times, except when you are adding or removing waste from the container.
- Be careful when handling the containers. Containers must be handled in a way as to prevent ruptures or leaks.
- If the container begins to leak or you notice any dents or bulges, transfer the waste to another container.

You must also prevent reactions of ignitable and/or incompatible wastes. The EPA developed three special management requirements for these wastes:


- Incompatible wastes must be physically separated.
- Store ignitable and/or reactive wastes at least 50 feet from your property line.
- Manage ignitable and/or reactive wastes to prevent fire and/or explosions.

Managing Incompatible and / or Reactive Wastes

Physically separate containers holding incompatible wastes from all other wastes or materials. Store the containers in an area surrounded by a berm, dike, wall or other physical structure.

Keep incompatible wastes from contacting / reacting with other wastes and materials.

Store ignitable and/or reactive wastes at least 50 feet from the property line of the facility. Many facilities stack drums along fence lines to maximize facility storage and space. However, ignitable and / or reactive wastes cannot be stored this way. Locating these wastes well within the property boundaries provides two safeguards:

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 16 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

- It reduces the risk of the general public reaching/contacting the waste or being harmed in an explosion.
- If a release of hazardous waste does occur, this will help prevent the waste from migrating offsite.

Managing Ignitable and/or Reactive Wastes to Prevent Fire and/or Explosions

At a minimum you must keep ignitable and / or reactive wastes away from:

- Fires.
- Hot surfaces like operating equipment and engines.
- Radiant heat or sunlight.
- Cutting and welding operations.
- Frictional heat.
- Sparks from static electricity or electrical operations or friction.
- Water if the product is reactive to water.


Finally, you must ban smoking in all areas that manage ignitable wastes, especially when wastes are being transferred/place into containers. **“NO Smoking”** signs must be posted at all areas near ignitable or reactive wastes.

Inspecting Containers

Container storage areas must be **inspected weekly**. Inspections protect you, your company and the public. Through inspections, you can stop spills **before** they happen.

The company should develop and maintain a standard inspection checklist to be used during every weekly inspection. The checklist should be detailed and address the labeling and management procedures followed by the facility. At a minimum the inspection checklist should cover the following:

- Leaks or staining from containers.
- Container condition, including dents, bulging, and /or corrosion.
- Labeling – Start date, the words “Hazardous Waste” and other information.

	Berry Bros. General Contractors, Inc. Corporate Policy Procedure (HSE) Health, Safety & Environmental Policies and Procedures Manual	
Issue Date: 08-11-2008		Section# 34
Page: 17 of 17		Doc # SWP - 34
Approver: Joe Berry		Revision: 2
HAZARDOUS WASTE MANAGEMENT SYSTEM		

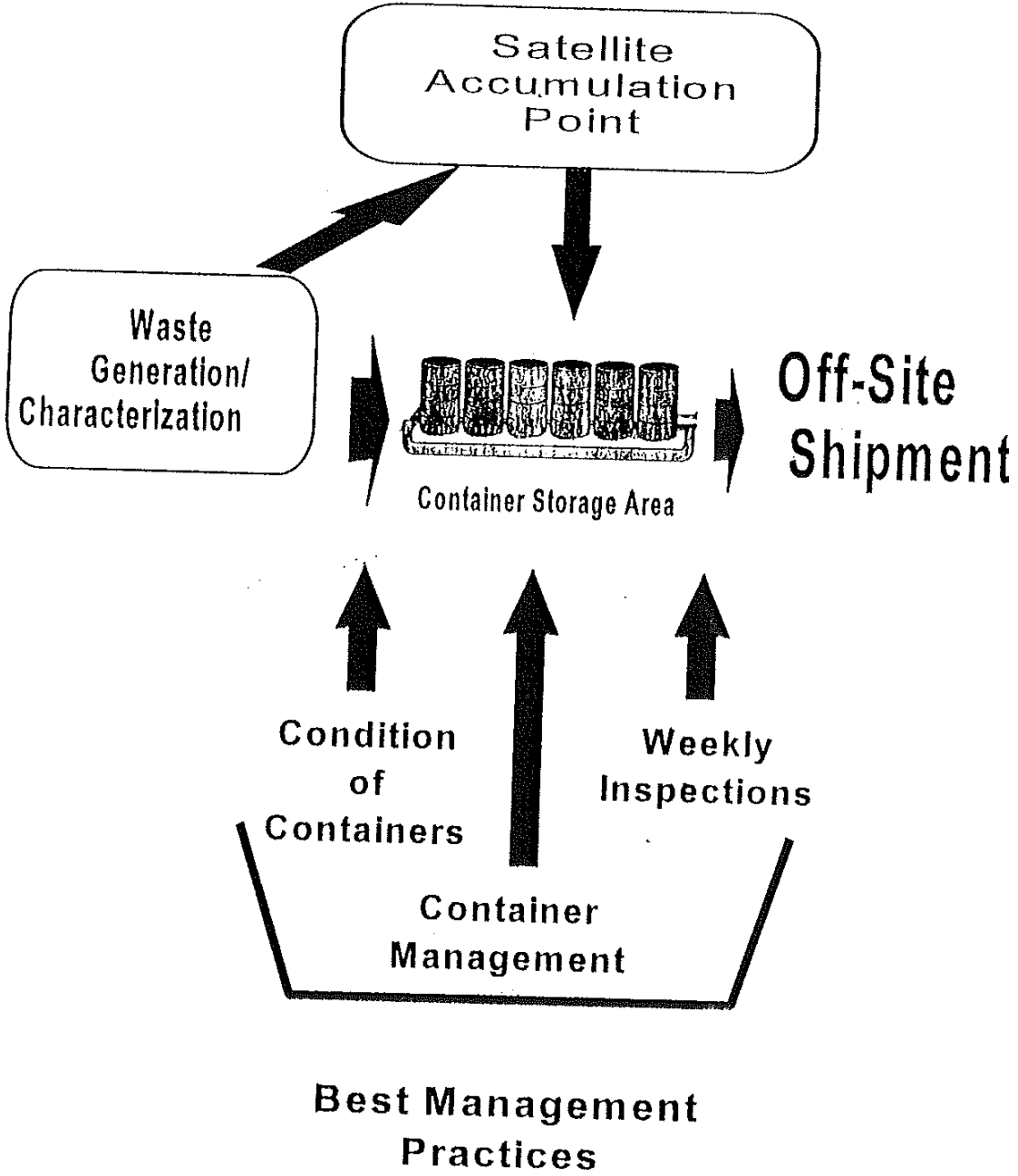
- Management practice. Such as aisle space and stacking.

Inspections should be detailed and methodical. Anyone doing the inspections should be trained.

Revision Date: 10-24-14, 5-17-17

Approved By: Joe Berry & Safety Committee

**CONTAINER
MANAGEMENT
PROCESS**



BEST MANAGEMENT PRACTICES for CONTAINERS

1 Characterize Waste

2 Do Not Mix Incompatible Wastes in a Container

3 Match the Waste with the Correct Type of Container

4 Mark Containers with the words "Hazardous Waste" and "Start Date"

5 Be sure to eliminate all previous markings before re-use

6 Keep Containers in GOOD Condition

7 Physically Separate Containers Holding Incompatible Wastes

8 Inspect Container Storage Areas Weekly

Inspector	Inspector	Inspector	Inspector	Inspector	Inspector	Inspector	Inspector
1	2	3	4	5	6	7	8
9	10	11	12	13	14	15	16
17	18	19	20	21	22	23	24
25	26	27	28	29	30	31	32

Adapted from U.S. EPA Region 5 Best Management Practices Handbook for Hazardous Waste

Hazardous Waste Container Storage Area Inspection Checklist

Date: _____

Instructions: Weekly, place a "YES" next to all inspections items that meet facility rules. Place "NO" next to all inspection items that do not meet the rules. Please provide specific comments on all "NO-marked" items. When weekly inspection is completed, the person conducting the inspection must initial at the bottom of the table. Report all No-marked items to the appropriate supervisor.

	Week 1 Date	Week 2 Date	Week 3 Date	Week 4 Date	Comments
Inspection Item					
Number of containers?					
Containers properly dated?					
Containers properly labeled?					
Containers stored 90 days or less?					
Containers observed to be free of leaks/staining?					
Containers observed with closed tops or bungs?					
Containers observed without dents or corrosion?					
Appropriate aisle space maintained?					
Containment system free of water or other liquids?					
Inspectors Initials					

Overall Comments:

Reviewed by: _____ Date: _____

Note: State and Federal regulations require that this inspection be performed weekly.