ENVIRONMENTAL COMPLIANCE INSPECTION CHECKLIST

The proponent is DPW-ENRD

ORGANIZATION: BUILDING(S):

ACTIVITY:
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POC: SUPERVISOR/COMMANDER:
DATE: INSPECTOR:

Summary Findings Report

1 - General					POC: Julie Majors, 334-255-1653, julie.p.majors.civ@army.mil	
	Question	YES	NO	NA	Comments	Citation
General Documentation						
1a.	Has the Environmental Officer been appointed on written orders as specified in AR 200-1?					Army Regulation 200-1, 1-28.f. *Appoint and train environmental officers at appropriate organizational levels to ensure compliance actions take place (see FM 3–34.500 for environmental officer responsibilities).*
1b.	Has the Environmental Officer attended training as specified in AR 200-1?					
1c.	Are all training activities, construction/renovation projects, and any proposed contracting actions submitted for NEPA review prior to initiating the activity?					32 CFR 651.1 (b) *This part requires environmental analysis of Army actions affecting human health and the environment; providing criteria and guidance on actions normally requiring Environmental Assessments (EAs) or Environmental Impact Statements (EISs), and listing Army actions that are categorically excluded from such requirements, provided specific criteria are met.*

2 - Oil & Material Storage					POC: Samuel Lynon, 334-255-1656, samuel.a.lynon.civ@army.mil	
	Question	YES	NO	NA	Comments	Citation
2a.	Have inspections been completed monthly for new products?					SPCC Plan Section 5.7. Fort Rucker requires monthly operator inspections, ... for all containers with the exception of used oil containers. Used oil, including used cooking oil, containers must be inspected by operators on a weekly basis. Operator inspections are conducted using AVCOE Form 2711, SPCC Plan Container Inspection Checklist in Appendix G.
2b.	Have inspections been completed weekly for used oil?					
2c.	Have inspections been completed using AVCOE Form 2711, *SPCC Plan Container Inspection Checklist*?					
2d.	Have inspection forms been turned in to DPW-ENRD monthly for all bulk oil storage containers 55-gallons and larger?					40 CFR 112.7.(e). *Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility.* SPCC Plan Section 5.7. *Operator inspections are conducted using AVCOE Form 2711, SPCC Plan Container Inspection Checklist in Appendix G. Copies of these inspections must be turned into DPW-ENRD by the 15th of the following month.*

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2e.	Has all hydraulic equipment been inspected as part of normal maintenance operations?					SPCC Plan Section 6.11.4. *However, the operator using this equipment is responsible for checking the equipment prior to each use and when any problems are encountered. Mobile hydraulic equipment is inspected, and any required maintenance is performed on an annual basis at a minimum.*
2f.	Are adequate spill response supplies (i.e., absorbents, spill kits) available?					SPCC Plan Section 5.1. *At all sites, such as shops, airfields and stagefields, spill kits are located near storage areas and can be easily accessed within a reasonable time to be effective in spill response.* ISCP Section 2.1. *To prevent spills everyone should: Ensure the work area has the appropriate spill kits and they are maintained and placed for easy access.*
2g.	Have all spills of any type of oil, regardless of container size or type, been appropriately cleaned (i.e., no visible oil/product near the container, on the container surface, or in secondary containment)?					ISCP Appendix B / AVCOE Form 2719, *Site Specific Spill Plan . Remove the source of the spill. Envelop spilled material on ground. Absorb spilled material; clean up soil. Containerize used absorbent & soil. Transmit a report of the spill.* 40 CFR 112.8(c)(10) *Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.*
2h.	Does the EO have access to the Installation Spill Contingency Plan (ISCP) (either in hard-copy or electronically)?					ISCP Section 1. A copy of the ISCP will be available at each site that stores, handles, or transfers oil, Per- and Polyfluoroalkyl Substances (PFAS), Aqueous Film Forming Foam (AFFF), or hazardous substances for which there is a reasonable possibility of a significant spill. ...If an organization does not have access to the website, a hard copy should be kept at the facility.

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2i.	Does the EO have access to the Spill Prevention, Control, and Countermeasures (SPCC) Plan (either in hard-copy or electronically)?					SPCC Section 3.3.1. Specific responsibilities [of the EO include]: • Implementation of unit-specific Standard Operating Procedures (SOPs) as those procedures relate to the Fort Rucker SPCC Plan; • Training of unit personnel on issues relating to the Fort Rucker SPCC Plan and unit-specific SOPs (e.g., reporting, proper Chain-of-Command notification); • Acquisition, organization, storage and maintenance of supplies/equipment for the clean-up of small spills; • Response to spills occurring within the organization, ensuring the most efficient spill diversion/containment possible; • Completion of initial and annual spill response training conducted under the auspices of the DPW-ENRD; • Maintain working knowledge of Fort Rucker's SPCC Plan as provided for in the Environmental Officer Course; • Satisfy all reporting protocols for releases as specified in the Fort Rucker SPCC Plan; and • Perform inspections of organization operations to ensure compliance and conformance with environmental plans.
2j.	Have all personnel received SPCC plan training appropriate for their positions?					
2k.	Is an updated copy of AVCOE Form 2719, *Site-Specific Spill Plan* , available on-site, as required?					AVCOE Form 2719, Site Specific Spill Plan Cover Page. Post [the title page of the Site Specific Spill Plan] prominently at each HWSAA, 90-Day HWCAA, Hazardous Material Storage Area, PFAS/AFFF Storage Area, and SPCC Container Storage Area. AVCOE Form 2719 Section 5. At a minimum, this plan will be updated annually.

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Container / Storage						
2l.	Are containers of used oil in good condition (no holes, rust, dents, leaks, etc.) ?					40 CFR 279.22(b)(1). *In good condition (no severe rusting, apparent structural defects or deterioration); and (2) Not leaking (no visible leaks).* SPCC Plan Section 5.7 *The inspection checklist covers container condition, container labeling, evidence of spills/leaks and associated cleanup measures, valve closure, gauge functioning, condition of secondary containment, containment valve closure, and collection of rainwater or product in containment structure.*
2m.	Are containers of new products in good condition (no holes, rust, dents, leaks, etc.)?					
2n.	Are containers of used oil clearly labeled as to content?					40 CFR 279.22(c)(1). *Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."*
2o.	Are containers of new products labeled as to content?					SPCC Plan Section 5.7. *The inspection checklist covers container condition, container labeling, evidence of spills/leaks and associated cleanup measures, valve closure, gauge functioning, condition of secondary containment, containment valve closure, and collection of rainwater or product in containment structure.* 29 CFR 1910.1200(f)(6). Except as provided in paragraphs (f)(7) and (f)(8) of this section, the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with either: *(i) The information specified under paragraphs (f)(1)(i) through (v) of this section for labels on shipped containers [i.e., (i) Product identifier; (ii) Signal word; (iii) Hazard statement(s); (iv) Pictogram(s); (v) precautionary statement(s)]; or,* *(ii) Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.*

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2p.	Are containers sealed/closed when not in use?					SPCC Plan Section 5.11. *All valves, fill ports, lids and any other openings are sealed and/or closed when not in use during product transfer activities.*
2q.	Is secondary containment large enough to contain the volume of the largest container plus rainwater?					40 CFR 112.8(c)(2) *Construct all bulk storage tank installations (except mobile refuelers and other non-transportation related trucks) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.*
2r.	Is secondary containment sufficiently impervious to contain spills/leaks (i.e., no cracks, visible vegetation, etc.)?					40 CFR 112.8(c)(2). *You must ensure that diked areas are sufficiently impervious to contain discharged oil.*
2s.	Is secondary containment checked and found to be free of material?					40 CFR 112.8(c)(10) *Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.*
2t.	If rainwater collects in secondary containment, is it inspected for contamination, documented on AVCOE Form 2716, *Secondary Containment Draining Activity Log*, and properly discharged at least weekly?					40 CFR 112.8(c)(3). *Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in 40 CFR 112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with 40 CFR 122.41(j)(2) and 122.41(m)(3) of this chapter.* SPCC Section 5.8. *Installation personnel drain rainwater from containment areas through normally locked manually activated valves. Prior to release, personnel inspect the water to ensure that no oil or other harmful substance will be drained along with the water. If oil is present, DPW- ENRD is contacted to take appropriate action for reporting and cleanup. After draining procedures are completed, all gate valves are returned to the closed position. Personnel maintain a drain log recording when rainwater is released from the containment areas (See Appendix F for sample log).*

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2u.	Is secondary containment valve kept closed?					40 CFR 112.8(c)(3) *Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in 40 CFR 112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with 40 CFR 122.41(j)(2) and 122.41(m)(3) of this chapter.*

3 - Washracks					**POC: Allison Marshall, 334-255-1658, allison.t.marshall.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
3a.	Are only allowable detergents being used on washrack?					40 CFR 110.4. *Addition of dispersants or emulsifiers to oil to be discharged that would circumvent the provisions of this part is prohibited.*
3b.	Is the hardstand of the washrack area free of spilled POL?					AR 200-1 Sect 4-2.e.(1)(c) *Control or eliminate sources of pollutants and contaminants to protect water bodies and groundwater.* ENV-WA004, Section 5.1.8, 5.2.6, 5.3.7. *Ensure that solvents, fuels or other hazardous materials are not stored on or released in to the washrack.* ENV-WA004, Section 5.1.10, 5.2.8, 5.3.9. *No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.*

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3c.	Is the washrack and OWS inspected weekly utilizing AVCOE Form 2712, *Washrack Inspection Checklist*?					AR 420-1 Sect 23-24.e. *Periodic inspections should be made of nondomestic wastewater sources (for example, laboratories, boiler plants, cooling towers, photographic developing facilities, oil/water separators, and other small treatment systems) to ensure that prohibited wastes are not being disposed into the wastewater collection system or, if authorized, then not in prohibited amounts.* ENV-WA004, Section 5.1.2, 5.3.3, 5.4.1. Inspect the washrack once a week (for shared washrack facilities, the predominant user will be overall responsible for inspections) utilizing AVCOE Form 2712, *Washrack Inspection Checklist*.
3d.	Is the trench drain/inlet grate free of sediment that could impede the intended operation of the washrack?					ENV-WA004, Section 5.3.6. *Ensure that all trash and debris is removed from the washrack after washing vehicles or equipment.*
3e.	Is the OWS functional?					ENV-WA004, Section 5.1.2, 5.4.1. *Inspect the washrack once a week (for shared washrack facilities, the predominant user will be overall responsible for inspections) utilizing AVCOE Form 2712, Washrack Inspection Checklist. Call in a Work Control Center at 255-9041 if the washrack or OWS appears to not be functioning properly.*
3f.	Is the OWS free of foreign debris and trash?					AR 420-1 Sect 23-18.g. *Prevention and control of surface and ground water pollution, including oil/water separators will be in accordance with AR 200–1.* AR 200-1 Sect 4-e.(1)(c) *Control or eliminate sources of pollutants and contaminants to protect water bodies and groundwater.*
3g.	Can the activity explain or show evidence of how personnel are trained to know proper washrack procedures and to ensure that they do not introduce improper substances into the washrack?					ENV-WA004 Section 5.1.3, 5.2.2, 5.3.2 *Ensure personnel using the washrack are instructed on proper usage procedures (review of this work instruction and on-site familiarization).*

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3h.	Is the valve positioned to discharge to storm drain when not washing aircraft or other equipment? Is valve positioned to oil/water separator when washing aircraft or other equipment?					ENV-WA004 Section 5.1.7. *For washracks that have diversion valves, ensure they are positioned for proper operation in accordance with posted instructions near the valve: 5.1.7.1 When washracks are not being utilized for washing, the valves will be positioned to cause the runoff to flow into the storm drain system. 5.1.7.2 While washing, the valves will be positioned to cause the flow to discharge to the oil water separator.*
3i.	Is the washrack free of evidence that aircraft/vehicle maintenance is being performed on the washrack (i.e., parts left lying around, oil products, etc)?					ENV-WA004, Section 5.1.10, 5.2.8, 5.3.9 *No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.*
3j.	Is the washrack free of improperly stored containers or products in the washrack area (i.e., unlabeled, open, bad condition, etc)?					AR 200-1 Sect 4-2.e.(1)(c) Control or eliminate sources of pollutants and contaminants to protect water bodies and groundwater. ENV-WA004 5.1.8, 5.2.6, 5.3.7. Ensure that solvents, fuels or other hazardous materials are not stored on or released in to the washrack.
3k.	Is the facility free of evidence that aircraft, vehicle, or equipment washing activities are being performed off the washrack?					BMP Section 6.8.2. All washing or rinsing activities associated with mission or industrial processes must occur at an approved washrack.
3l.	Is the washrack free of evidence that aircraft, vehicle, or equipment fueling activities are being performed on the washrack?					ENV-WA004, Section 5.1.10, 5.2.8, 5.3.9 *No maintenance or refueling/defueling of vehicles, aircraft, or equipment will be performed on the washrack.*
3m.	Are hoses/faucets turned off (and not leaking) when not actively washing vehicles, equipment, or aircraft?					ENV-WA004 Section 5.1.9, 5.2.7, 5.3.8 *Ensure hoses and faucets are not leaking or running when not actively washing aircraft or vehicles. If leaking, notify the Work Control Center at 255-9041.*
3n.	Is a copy of the organizaton's NPDES permit available for review?					ENV-WA004 Section 5.3.10 All organizations/units that are required by ADEM rules to maintain their own NPDES permit must submit a copy of the permit to the DPW-ENRD. DPW-ENRD must be notified immediately if there is a violation of the existing permit for the facility as it is located within the confines of Fort Rucker. The unit/organization is responsible for maintaining compliance with their permit and any applicable reporting.
3o.	Has a copy been submitted to DPW-ENRD?					

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4 - 90-HWCAA					**POC: Travis Farmer, 334-255-0487, travis.a.farmeri.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
4a.	Is the 90-day hazardous waste central accumulation area (90-HWCAA) secured to prevent unauthorized entry?					HWMP Section 6.6. *Each 90-HWCAA is located within a secure area. All entrances will be locked when the facilities are closed.*
4b.	Is signage posted around the accumulation area as required?					40 CFR 265.14(c). *Unless exempt under paragraphs (a)(1) and (a)(2) of this section, a sign with the legend, "Danger-Unauthorized Personnel Keep Out," must be posted at each entrance to the central accumulation area, and at other locations, in sufficient numbers to be seen from any approach to this active portion.* *HWMP Section 6.6. Signs are posted with the wording "NO SMOKING, HAZARDOUS WASTE, DANGER – UNAUTHORIZED PERSONNEL KEEP OUT". All signs should be legible from 25 feet away and able to be seen from any approach to an entrance. Existing signs with a legend other than "DANGER – UNAUTHORIZED PERSONNEL KEEP OUT" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter.*
4c.	Has the 90-HWCAA Manager been formally appointed using AVCOE Form 2733?					HWMP Section 3.4.• Ensure an up-to-date appointment letter using AVCOE Form 2733, HWSAA and HWCAA Manager Appointment Memo, from their supervisor/commander is readily available and that the letter has been submitted to DPW-ENRD prior to performing hazardous waste management duties.

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4d.	Does the manager of the storage area have AVCOE Form 2719, *Site-Specific Spill Plan* available at the 90-HWCAA?					HWMP Section 6.10 Individual activities and tenants will maintain the following records and documents and maintain them in accordance with ENV-P002: Document Control Procedure: 6.10.1 Records that must be kept in the 90-HWCAA •Site Specific Spill Plan (AVCOE Form 2719) •90-HWCAA inspection records (AVCOE Form 2726)
4e.	Does the manager of the storage area have 90-HWCAA inspection records (AVCOE Form 2726) available at the 90-HWCAA?					
4f.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): Hazardous waste training records, including AVCOE Form 2735?					HWMP Section 6.10 Individual activities and tenants will maintain the following records and documents and maintain them in accordance with ENV-P002: Document Control Procedure: 6.10.2 Records that may be kept in a separate work area •Hazardous waste training records, including AVCOE Form 2735 (maintain for a minimum of three years from when the employee last worked at the facility) •Fort Rucker HWMP (this document) •Fort Rucker ISCP and SPCC Plan •DD Form 1348-1A turn-in documents •Manifests and Land Disposal Restrictions (Cairns, Shell, and Main 90-Day only) •Waste profile list
4g.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): Fort Rucker HWMP?					
4h.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): Fort Rucker ISCP and SPCC Plan?					
4i.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): DD Form 1348-1A turn-in documents?					
4j.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): Manifests and Land Disposal Restrictions (Cairns, Shell, and Main 90-Day only)?					
4k.	Does the manager of the storage area have the required documents available in an accesible location (not necessarily at the 90-HWCAA): Hazardous waste profile list?					

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4l.	Are inspections of the hazardous waste storage area being conducted at least once every 7 days using the appropriate form (AVCOE Form 2726)?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(v). At least weekly, the large quantity generator must inspect central accumulation areas. The large quantity generator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. The large quantity generator must record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.
4m.	Are hazardous waste containers properly labeled with the words "HAZARDOUS WASTE" and the EPA ID?					ADEM Admin Code 335-14-3-.01(7)(a)(5.)(i) A large quantity generator must mark or label its containers with the following: a. The words “Hazardous Waste” and the EPA hazardous waste number; b. An indication of the hazards of the contents (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the DOT requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the OSHA Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the NFPA code 704); and; c. The date upon which each period of accumulation begins clearly visible for inspection on each container.
4n.	Are hazardous waste containers properly labeled with the description of content(s)?					
4o.	Are hazardous waste containers properly labeled with waste code(s)?					
4p.	Are hazardous waste containers properly labeled with accumulation start date?					
4q.	Are hazardous waste containers properly labeled with an indication of the hazard(s) of the contents (i.e. ignitable, corrosive, reactive, and/or toxic)?					
4r.	Are all containers at Cairns, Shell, & Main Post within 40 days of accumulation start date unless notification has been sent to DPW-ENRD?					ADEM Admin Code 335-14-3-.01(7)(a). A large quantity generator accumulates hazardous waste on site for no more than 90 days, unless in compliance with the accumulation time limit extension or F006 accumulation conditions for exemption in 335-14-3-.01(7)(b) through (e). [and it meets listed conditions]. HWMP Sect 3.5. For Cairns, Shell, and Main Post 90-HWCAA, report containers in a 90-HWCAA over 40 days to DPW-ENRD. For Hanchey, Lowe, AMSS, and Knox interim 90-HWCAA, transfer waste to the Main Post 90-HWCAA within 7 calendar days of receipt.
4s.	Are all containers within 7 calendar days of receipt at Hanchey, Lowe, Knox, and AMSS?					
4t.	Are all containers under 90 days from accumulation start date at the facility regardless of location?					
4u.	Are the containers used to store the hazardous waste made of or lined with materials which are compatible with the hazardous waste?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(iii). The large quantity generator must use a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

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4v.	Are incompatible wastes appropriately segregated?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(vii)(c). A container holding a hazardous waste that is incompatible with any waste or other materials accumulated or stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.
4w.	Are all containers closed except when adding or removing waste?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(iv). A container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste and must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak. Containers having a capacity greater than 30 gallons must not be stacked over two containers high.
4x.	Are hazardous waste containers free from leaks, rust, or dents?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(ii). If a container holding hazardous waste is not in good condition, or if it begins to leak, the large quantity generator must immediately transfer the hazardous waste from this container to a container that is in good condition, or immediately manage the waste in some other way that complies with the conditions for exemption of this section (335-14-3-.01).
4y.	Are containers greater than 30-gallons stacked no more than 2 high?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(iv). Containers having a capacity greater than 30 gallons must not be stacked over two containers high.
4z.	Does the hazardous waste storage area have an alarm or emergency communication method in case of a major spill or accident?					ADEM Admin Code 334-14-3-.14(3). All areas deemed applicable by 335-14-3-.14(1) must be equipped with the items in 335-14-3-.14(3)(a) through (d) (unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below or the actual hazardous waste generation or accumulation area does not lend itself for safety reasons to have a particular kind of equipment specified below). A large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: (a) An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel; (b) A device, such as a telephone (immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from local law enforcement agencies, fire departments, or state or local emergency response teams;

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4aa.	Does the hazardous waste storage area have a portable fire extinguisher on hand?					ADEM Admin Code 334-14-3-.14(3). All areas deemed applicable by 335-14-3-.14(1) must be equipped with the items in 335-14-3-.14(3)(a) through (d) (unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below or the actual hazardous waste generation or accumulation area does not lend itself for safety reasons to have a particular kind of equipment specified below). A large quantity generator may determine the most appropriate locations within its facility to locate equipment necessary to prepare for and respond to emergencies: (c) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment; and (d) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems.
4bb.	Does the hazardous waste storage area have spill control equipment, such as absorbent material, on hand and at the site?					
4cc.	Is there enough space between aisles to allow free movement for inspection, emergency personnel, fire extinguishers, hoses, and spill control equipment?					ADEM Admin Code 334-14-3-.14(6). The large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.The large quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.
4dd.	For liquid wastes, is the secondary containment system free of significant cracks, gaps, corrosion, or other deterioration?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(viii). Container storage areas must meet the containment requirements of 335-14-6-.09(6). ADEM Admin Code 335-14-6-.09(6)(a). Container storage areas must have a containment system that is designed and operated in accordance with 335-14-6-.09(6)(b), except as otherwise provided by 335-14-6-.09(6)(c). (b)1. A base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;

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4ee.	For liquid wastes, is the secondary containment system large enough to hold 10% of the total volume of all containers or the volume of the largest container?					ADEM Admin Code 335-14-6-.09(6)(a). Container storage areas must have a containment system that is designed and operated in accordance with 335-14-6-.09(6)(b), except as otherwise provided by 335-14-6-.09(6)(c). ADEM Admin Code 335-14-6-.09(6)(b)3. The containment system must have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination;
4ff.	For wastes with no free liquids, is the storage area designed to remove liquid resulting from precipitation or are the containers elevated or otherwise protected from contact with accumulated liquid?					ADEM Admin Code 335-14-6-.09(6)(c). Storage areas that store containers holding only wastes that do not contain free liquids need not have a containment system defined by 335-14-6-.09(6)(b), except as provided by 335-14-6-.09(6)(d) or provided that: 1. The storage area is sloped or is otherwise designed and operated to drain and remove liquid resulting from precipitation, or 2. The containers are elevated or are otherwise protected from contact with accumulated liquid.

5 - HWSAAs					**POC: Travis Farmer, 334-255-0487, travis.a.farmeri.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
5a.	Does the HWSAA meet the total accumulation requirements not to exceed 55-gallons of hazardous waste or 1 quart of acutely hazardous waste (of any one waste stream)?					ADEM Admin Code 334-14-3-.01(5)(a). A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in 335-14-2-.04(2) or 335-14-2-.04(4)(e) or 1 kg (2.2 lbs) of solid acute hazardous waste listed in 14-2-.04(2) or 335-14-2-.04(4)(e) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of 335-14-5 through 335-14-8, provided that all of the conditions for exemption in this section are met. A generator may comply with the conditions for exemption in this section instead of complying with the conditions for exemption in 335-14-3-.01(6)(b) or (7)(a), except as required in 335-14-3-.01(5)(a)7.through 8. The conditions for exemption for satellite accumulation are: [meets listed conditions].

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5b.	Have all full containers of HW been transferred to the 90-HWCAA within three consecutive calendar days of the accumulation start date?					ADEM Admin Code 334-14-3-.01(5)(a)(6.) A generator who accumulates either acute hazardous waste listed in 335-14-2-.04(2) or 335-14-2-.04(4)(e) or non-acute hazardous waste in excess of the amounts listed in 335-14-3-.01(5)(a) at or near any point of generation must do the following: (i) Comply within three consecutive calendar days with the applicable central accumulation area regulations in 335-14-3-.01(6)(b) or (7)(a), or (ii) Remove the excess from the satellite accumulation area within three consecutive calendar days to either a central accumulation area operated in accordance with the applicable requirements in 335-14-3-.01(6)(b) or (7)(a), an on-site interim status or permitted treatment, storage, or disposal facility, or an off-site designated facility; and (iii) During the three-consecutive-calendar-day period the generator must continue to comply with 335-14-3-.01(5)(a)1.through 5. The generator must mark or label the container(s) holding the excess accumulation of hazardous waste with the date the excess amount began accumulating.
5c.	Are hazardous waste containers at or near the point of generation and under the control of the operator of the process who generates the HW?					ADEM Admin Code 334-14-3-.01(5)(a). A generator may accumulate as much as 55 gallons of non-acute hazardous waste and/or either one quart of liquid acute hazardous waste listed in 335-14-2-.04(2) or 335-14-2-.04(4)(e) or 1 kg (2.2 lbs) of solid acute hazardous waste listed in 14-2-.04(2) or 335-14-2-.04(4)(e) in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with the requirements of 335-14-5 through 335-14-8, provided that all of the conditions for exemption in this section are met [meets listed conditions].
5d.	Are containers used to store the hazardous waste made of or lined with materials which are compatible with the hazardous waste?					ADEM Admin Code 335-14-3-.01(5)(a)(2.) The generator must use a container made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be accumulated, so that the ability of the container to contain the waste is not impaired.
5e.	Are all containers closed except when actively adding or removing waste?					ADEM Admin Code 335-14-3-.01(7)(a)(1.)(iv). A container holding hazardous waste must always be closed during accumulation, except when it is necessary to add or remove waste and must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak. Containers having a capacity greater than 30 gallons must not be stacked over two containers high.

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5f.	Are hazardous waste containers free from leaks, rust, or dents?					ADEM Admin Code 335-14-3-.01(5)(a)(1.) If a container holding hazardous waste is not in good condition, or if it begins to leak, the generator must immediately transfer the hazardous waste from this container to a container that is in good condition and does not leak, or immediately transfer and manage the waste in a central accumulation area operated in compliance with 335-14-3-.01(6)(b) or (7)(a).
5g.	Are hazardous waste containers labeled properly with the words "HAZARDOUS WASTE"?					ADEM Admin Code 334-14-3-.01(5)(a)5. A generator must mark or label its container with the following: (i) The words “Hazardous Waste” and (ii) An indication of the hazards of the contents (examples include, but are not limited to, the applicable hazardous waste characteristic(s) (i.e., ignitable, corrosive, reactive, toxic); hazard communication consistent with the DOT requirements at 49 CFR part 172 subpart E (labeling) or subpart F (placarding); a hazard statement or pictogram consistent with the OSHA Hazard Communication Standard at 29 CFR 1910.1200; or a chemical hazard label consistent with the NFPA code 704).
5h.	Are hazardous waste containers labeled properly with the description of content(s)?					
5i.	Are hazardous waste containers properly labeled with an indication of the hazard(s) of the contents (i.e. ignitable, corrosive, reactive, and/or toxic)?					
5j.	Are hazardous waste containers labeled properly with hazardous waste code(s)?					
5k.	Are hazardous waste containers labeled properly with EPA ID number?					
5l.	Are hazardous waste interim container(s) properly managed?					HWMP Section 5.4.5 Interim Container Management
5m.	Has the HWSAA Manager been formally appointed using the appropriate form (AVCOE Form 2733)?					HWMP Section 3.4.•Ensure an up-to-date appointment letter using AVCOE Form 2733, *HWSAA and HWCAA Manager Appointment Memo*, from their supervisor/commander is readily available and that the letter has been submitted to DPW-ENRD prior to performing hazardous waste management duties.
5n.	Are HWSAA areas inspected at a minimum of once every week using the appropriate form (AVCOE Form 2725)?					HWMP Section 5.7. The HWSAA must be inspected weekly (every 7 days) using AVCOE Form 2725, *Hazardous Waste Satellite Accumulation Area Inspection Checklist.*

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5o.	Does the manager of the HWSAA have the required documents available at the HWSAA: AVCOE Form 2719, *Site-Specific Spill Plan*?					HWMP Section 5.9 Individual activities and tenants will maintain the following records and documents and maintain them in accordance with ENV-P002: Document Control Procedure 5.9.1 Records that must be kept in the HWSAA •Site Specific Spill Plan (AVCOE Form 2719) first page with the location of the entire plan noted•HWSAA inspection records (AVCOE Form 2725) 5.9.2 Records that may be kept in a separate work area •Complete Site Specific Spill Plan (AVCOE Form 2719)•Fort Rucker HWMP (this document) •Hazardous waste training records, including AVCOE Form 2735 (maintain for a minimum of three years from when the employee last worked at the facility) •Fort Rucker ISCP and SPCC Plan
5p.	Does the manager of the HWSAA have the required documents available at the HWSAA: HWSAA inspection records (AVCOE Form 2725)?					
5q.	Does the manager of the HWSAA have the required documents available in an accessible location (not necessarily at the HWSAA): Fort Rucker HWMP?					HWMP Section 5.9 Individual activities and tenants will maintain the following records and documents and maintain them in accordance with ENV-P002: Document Control. •Site Specific Spill Plan (AVCOE Form 2719) first page with the location of the entire plan noted •HWSAA inspection records (AVCOE Form 2725) •Complete Site Specific Spill Plan (AVCOE Form 2719) •Fort Rucker HWMP (this document) •Hazardous waste training records, including AVCOE Form 2735 (maintain for a minimum of three years from when the employee last worked at the facility) •Fort Rucker ISCP and SPCC Plan
5r.	Does the manager of the HWSAA have the required documents available in an accessible location (not necessarily at the HWSAA): Hazardous waste training records, including AVCOE Form 2735?					
5s.	Does the manager of the HWSAA have the required documents available in an accessible location (not necessarily at the HWSAA): Fort Rucker ISCP and SPCC Plan?					

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6 - UW					**POC: Travis Farmer, 334-255-0487, travis.a.farmeri.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
6a.	Are universal waste containers of batteries (lithium, NiCd, lead acid, mercury) closed, structurally sound, compatible with the contents, and lack evidence of leakage?					ADEM Admin Code 335-14-11-.03(4)(a)1. *A large quantity handler of universal waste must contain any universal waste battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.*
6b.	Are universal waste containers of pesticides closed, structurally sound, compatible with the contents, and lack evidence of leakage?					ADEM Admin Code 335-14-11-.03(4)(b)1. *A container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.*
6c.	Are universal waste containers of mercury-containing equipment closed, structurally sound, compatible with the contents, and lack evidence of leakage?					ADEM Admin Code 335-14-11-.03(4)(c)1. *A large quantity handler of universal waste must place in a container any universal waste mercury-containing equipment with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. The container must be closed, structurally sound, compatible with the contents of the device, must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and must be reasonably designed to prevent the escape of mercury into the environment by volatilization or any other means.*
6d.	Are universal waste containers of fluorescent bulbs closed, structurally sound, compatible with the contents, and lack evidence of leakage?					ADEM Admin Code 335-14-11-.03(4)(d)1. *A large quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.*
6e.	Are universal waste batteries stored in containers marked "Universal Waste (with the type of waste)"?					ADEM Admin Code 335-14-11.03(5)(a) *Universal waste batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste Battery(ies)", or "Waste Battery(ies)", or "Used Battery(ies)";*

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6f.	Are universal waste pesticides stored in containers marked "Universal Waste (with the type of waste)"?					ADEM Admin Code 335-14-11.03(5)(b) *A container (or multiple container package unit), tank, transport vehicle or vessel in which recalled universal waste pesticides as described in 335-14-11-.01(3)(a)1. are contained must be labeled or marked clearly with: 1. The label that was on or accompanied the product as sold or distributed; and 2. The words "Universal Waste Pesticide(s)" or "Waste Pesticide(s)"*
6g.	Are universal waste mercury-containing equipment stored in containers marked "Universal Waste (with the type of waste)"?					ADEM Admin Code 335-14-11.03(5)(d)1. *Universal waste mercury-containing equipment (i.e., each device), or a container in which the equipment is contained, must be labeled or marked clearly with any one of the following phrases: "Universal Waste-Mercury Containing Equipment", "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment." 2. A universal waste mercury-containing thermostat or container containing only universal waste mercury-containing thermostats may be labeled or marked clearly with any of the following phrases: "Universal Waste-Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)."*
6h.	Are universal waste fluorescent bulbs stored in containers marked "Universal Waste (with the type of waste)"?					ADEM Admin Code 335-14-11.03(5)(e) *Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with any one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".*
6i.	Is the container dated when the first waste is placed inside the container?					ADEM Admin Code 335-14-11-.03(6)(c) *A large quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. The handler may make this demonstration by: 1. Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;*

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6j.	Have batteries been properly packaged to prevent short-circuiting (i.e., in original inner package, taped positive end, in plastic baggies)?					Fort Rucker ENV-SW002 Sect 5.2.2.2 Units, organizations or contractors are responsible for ensuring that all used batteries are properly separated by Universal Waste Battery types to prevent short-circuiting during storage and transportation. Universal Waste batteries will be separated by one of the following methods:-placing batteries in the original inner package;-taping the positive end of the batteries; or,-by using plastic “baggies” to separate individual batteries. [This includes Lithium, NiCd, Mercuric-Oxide, NiMH, Silver Oxide, Silver-Zinc, Zinc-Carbon, and Zinc Air]
6k.	Are universal waste containers of aerosol cans/contents structurally sound, compatible with the contents of the aerosol cans, lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and is protected from sources of heat?					ADEM Admin Code 335-14-11-.02 (e) Aerosol cans. A small quantity handler of universal waste must manage universal waste aerosol cans in a way that prevents releases of any universal waste or component of a universal waste to the environment, as follows: 1. Universal waste aerosol cans must be accumulated in a container that is structurally sound, compatible with the contents of the aerosol cans, lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and is protected from sources of heat. 2. Universal waste aerosol cans that show evidence of leakage must be packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained in accordance with the requirements of 335-14-11-.02(4)(e)4.
6l.	Are universal waste aerosol cans that show evidence of leakage packaged in a separate closed container or overpacked with absorbents, or immediately punctured and drained?					
6m.	Are all releases of universal waste and residue immediately contained and cleaned up?					ADEM Admin Code 335-14-11-.03(8)(a) *A large quantity handler of universal waste must immediately contain all releases of universal wastes and other residues from universal wastes.*
6n.	Is universal waste being accumulated for no more than 6 months from the date received?					HWMP Section 3.4.k. *Ensure that universal wastes containers are removed within six months of the accumulation start date.*
6o.	Are used aerosol cans that are not in use collected in the operational area in a structurally sound and compatible container marked “USED AEROSOL CANS” and “RETURN TO HMCC.”?					ADEM Admin Code 335-14-11-.02 (e) 3. A small quantity handler of universal waste may conduct the following activities as long as each individual aerosol can is not breached and remains intact: (i) Sorting aerosol cans by type; (ii) Mixing intact cans in one container; and (iii) Removing actuators to reduce the risk of accidental release; HWMP 11.4 Users should collect aerosol cans not in use in the operational area in a structurally sound and compatible container marked “USED AEROSOL CANS” and “RETURN TO HMCC”

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6p.	Are punctured and drained aerosol cans being accumulated for recycling?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans....
6q.	Is the puncturing device specifically designed to safely puncture aerosol cans and effectively contains the residual contents?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans: (i) Conduct puncturing and draining activities using a device specifically designed to safely puncture aerosol cans and effectively contain the residual contents and any emissions thereof.
6r.	Is the written procedure detailing how to safely puncture and drain the universal waste aerosol can and a copy of the manufacturers specifications and instructions available?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans: (ii) Establish and follow a written procedure detailing how to safely puncture and drain the universal waste aerosol can (including proper assembly, operation and maintenance of the unit, segregation of incompatible wastes, and proper waste management practices to prevent fires or releases); maintain a copy of the manufacturer's specification and instruction on site; and ensure employees operating the device are trained in the proper procedures.
6s.	Is the puncturing device located on a solid, flat surface in a well-ventilated area?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans: (iii) Ensure that puncturing of the can is done in a manner designed to prevent fires and to prevent the release of any component of universal waste to the environment. This includes, but is not limited to, locating the equipment on a solid, flat surface in a well-ventilated area.

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6t.	Are punctured aerosol can contents immediately transferred to an appropriate container?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans: (iv) Immediately transfer the contents from the waste aerosol can or puncturing device, if applicable, to a container or tank that meets the applicable requirements of 335-14-3-.01(4), 335-14-3-.01(5), 335-14-3-.01(6), or 335-14-3-.01(7).
6u.	Has a hazardous waste determination been made for the aerosol content wastestream?					ADEM 335-14-11-.02 (e) 4. A small quantity handler of universal waste who punctures and drains their aerosol cans must recycle the empty punctured aerosol cans and meet the following requirements while puncturing and draining universal waste aerosol cans: (v) Conduct a hazardous waste determination on the contents of the emptied aerosol can per 335-14-3-.01(2). Any hazardous waste generated as a result of puncturing and draining the aerosol can is subject to all applicable requirements of 335-14-1 through 335-14-9. The handler is considered the generator of the hazardous waste and is subject to 335-14-3.

7 - Solid Waste					**POC: Brent Waters , 334-255-2080, brent.waters3.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
General Storage Requirements						
7a.	Is solid waste stored in a manner that does not create a nuisance, health hazard, or food/harborage for vermin and vectors; result in litter or contamination of water?					ADPH Admin Code 420-3-5-.10(2) *All solid waste shall be stored in a manner that does not constitute a nuisance or health hazard or provide food or harborage for vermin or vectors, and shall be contained or bundled so as not to result in litter or the contamination of ground or surface water.*
7b.	Is the area around the solid waste collection containers maintained in a sanitary manner?					ADPH Admin Code 420-3-5-.10(8) *The site where solid waste storage containers are located shall be adequately maintained in a sanitary manner which shall include, but not be limited to, the following: (a) Regular cleaning of the site and containers. (b) The prompt remediation of spillage or leakages of solid, semi-solid, or liquid waste. (c) The control of vegetation on and around the site. (d) Vermin and vector control on the site and in the containers.*

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7c.	Has the organization reported to the DPW COR any solid waste collection containers that are not available in adequate quantities or are in poor condition?					ADPH Admin Code 420-3-5-.10(3) *Storage systems for solid waste shall include containers of adequate size and strength, and in sufficient numbers, to contain all solid waste that each person generates in the period of time between collections or disposal.* ADPH Admin Code 420-3-5-.10(5) *Garbage or rubbish containing garbage shall be stored in: (a) Rigid containers that are of a size to accommodate the waste generated and that are durable, rust resistant, washable, nonabsorbent, watertight, and vermin proof. The container shall be easy to clean and fixed with close fitting fly-tight lids or covers. The containers shall be constructed in a manner to facilitate handling.*
7d.	Is the organization participating in the installation recycling program?					AR 200-1, Sect 10-2.a.(3) *Minimize solid waste generation and disposal, and maximize recovery, recycling, and reuse through pollution prevention actions.*
7e.	Have potentially hazardous waste streams been evaluated to determine if they are a hazardous waste and managed appropriately based on that determination?					40 CFR 262.11: *A person who generates a solid waste, as defined in 40 CFR 261.2, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations. (e) If the waste is determined to be hazardous, the generator must refer to parts 261, 264, 265, 266, 267, 268, and 273 of this chapter for possible exclusions or restrictions pertaining to management of the specific waste."*
7f.	Are all used materials and non-regulated wastes identified in the Hazardous Waste Management Plan stored in accordance with Fort Rucker procedures?					HWMP Section 11: The following sections describe specific management procedures for hazardous wastes, universal wastes, and non-hazardous wastes that are commonly encountered during daily operations at Fort Rucker. [Refer to HWMP for specific guidelines.]
7g.	Does the EO have access to the Integrated Solid Waste Management Plan (ISWMP) (either in hard-copy or electronically)?					ISWMP Section 4.17. *Specific responsibilities [of the EO] include:1. Ensure no prohibited items are placed in the trash containers at assigned facilities. Check daily for improper disposal of prohibited items in all waste containers. 2. Emphasize waste reduction, recycling, and green purchasing within each organization. Ensure recyclables are segregated prior to placing trash in dumpsters to ensure maximum recycling potential.3. Act as the organization recycling coordinator to organize recycling efforts and coordinate with the environmental office regarding solid waste management, recycling, green purchasing, and pollution prevention.*

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Scrap Tire Requirements						
7h.	If 10 or more scrap tires are generated during the year, does the organization have a copy of their receiver registration?					ADEM Admin Code 335-4-3-.01 (2) *The following scrap tire facilities are required to register with ADEM using ADEM Form 537: (a) Class One and Class Two Receivers.*
7i.	Are less than 1,500 scrap tires accumulated for Class I receivers and less than 300 scrap tires accumulated for Class II receivers?					ADEM Admin Code 335-4-4-.01 (2) *A Class One Receiver may be registered to accumulate no more than 1,500 scrap tires.* (3) *A Class Two Receiver may be registered to accumulate no more than 300 scrap tires.*
7j.	Have scrap tires been exposed to the elements for less than 7 days?					ADEM Admin Code 335-4-4-.01 (1) ... *No person may expose accumulated scrap tires to the elements for more than thirty (30) days.* ADEM Admin Code 335-4-5-.01(2) *No receiver may expose scrap tires to the elements for more than thirty (30) days. If scrap tires are exposed to the elements for more than seven (7) days, a Vector Control Plan shall be prepared and implemented.*
7k.	Have all shipments of tires been manifested on ADEM Form 536 and are they available for inspection?					ADEM Admin Code 335-4-4-.05(b) *A receiver who transports, or offers for transportation, more than ten (10) scrap tires per year for off-site processing or disposal shall complete a manifest for each shipment.*
7l.	Does the organization have copies of scrap tire quarterly reports submitted on ADEM Form 539?					ADEM Admin Code 335-4-5-.03 *A receiver shall submit a scrap tire quarterly report, utilizing ADEM Form 539, for each quarter of the calendar year (January through March, April through June, July through September, and October through December). All reports shall be submitted to ADEM by the 28th day following the end of each reporting period.*

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7m.	Does the organization have all required documents for the scrap tire receiver operating record and maintain the record for at least three years?					ADEM Admin Code 335-4-5-.04 *An operating record for the receiver shall be maintained at the facility or in an alternate location approved by ADEM. (a) The following information shall be placed in the operating record as it becomes available: 1. Copies of the ADEM registration approval. 2. Registration application. 3. Appropriate information on all vehicles transporting tire materials, to include vehicle identification number, make/model, and license number, and decal numbers assigned to those vehicles. 4. Reports or documentation generated during the normal operation of the receiving facility including, but not limited to: (i) Manifests of tires or tire materials received or shipped. (ii) Quarterly Reports utilizing ADEM Form 539. (iii) Arrangement for fire protection services, if applicable. (iv) Vector Control Plan as referenced in 335-4-1-.04(5). (v) Any other report or document generated in the normal operation of the facility that is submitted to ADEM. (b) Information contained in the operating record shall be retained for at least three (3) years. Records relating to a violation or enforcement action shall not be removed from the operating record until these matters are resolved.*

8 - Stormwater - Construction					**POC: Allison Marshall, 334-255-1658, allison.t.marshall.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
8a.	Do construction projects at this location disturbing 1 acre or more of land have a NPDES Permit Notice of Intent (NOI) from ADEM?					NPDES General Permit ALR100000, Part I A *This permit authorizes, subject to the conditions of this permit, discharges associated with construction activity that will result in land disturbance equal to or greater than one (1) acre or from construction activities involving less than one (1) acre and which are part of a common plan of development or sale equal to or grater than one(1) acre occurring on or before and continuing after the effective date of this permit, except for discharges identified under Part I.C. of the permit.*

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8b.	Does the EO have access (electronic or hard-copy) to the Best Management Practices (BMP) Plan?					BMP Section 4.7. Specific responsibilities [of the EO] include, but are not limited to, the following: •Implement organization-specific good housekeeping measures, BMPs, and Standard Operating Procedures (SOPs), as those procedures relate this Plan •Ensure proper storage and management of organization hazardous materials, excess or expired hazardous materials, and waste streams per the Fort Rucker Hazardous Waste Management Plan (HWMP), Fort Rucker Hazardous Material Control Center SOPs, work instructions, and additional guidance provided by DPW-ENRD. •Ensure proper acquisition, organization, storage, and maintenance of supplies/equipment for the cleanup of small spills •Respond to spills occurring within the organization's area of responsibility and ensure the most efficient spill diversion/containment possible•Complete annual spill response training as required by the ISCP and SPCC Plan •Maintain a working knowledge of this Plan as provided for in the Environmental Officer Course •Train organization personnel about installation environmental programs, policies, and organization-specific SOPs, as well as any organizational-level procedures necessary to comply with installation policies and issues relating to this Plan •Perform inspections of organization operations to ensure compliance and conformance with environmental plans •Ensure proper reporting and recordkeeping. Maintain records as listed in Section 6.6 of this Plan •Advise the commander, director, or supervisor of any environmental problems, issues, potential violations, or legalities.
8c.	Have all personnel received training appropriate to their positions?					
8d.	Do permitted activities have a Construction Best Management Practice Plan (CBMPP)?					NPDES General Permit ALR100000 Part III E.1. *Except as provided by Part II.F.2, construction activity may not commence until a CBMPP has been prepared in a format acceptable to the Department and certified by a QCP as adequate to meet the requirements of this permit.*

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8e.	Are BMPs functioning properly?					NPDES General Permit ALR100000 Part III H 2.(a). *Each day there is activity at the site, the Permittee shall visually observe that portion of the construction project where active disturbance, work, or construction occurred to note any rainfall measurements occurring since the previous observation, and any apparent BMP deficiencies in the area of active disturbance.*
8f.	Are the stormwater outfalls at this location free of silt discharges?					NPDES General Permit ALR100000 Part III H 3(a). *A site inspection shall consist of a complete and comprehensive observation of the entire construction site including all areas of land disturbance, areas used for storage of materials that are exposed to precipitation, equipment storage and maintenance areas, affected ditches and other stormwater conveyances, as well as all outfalls, receiving waters and stream banks to determine if, and ensure that: (i) Effective erosion controls and sediment controls have been fully implemented and maintained in accordance with this permit, the site CBMPP, and the Alabama Handbook; (ii) Pollutant discharges are being prevented/ minimized, and (iii) Discharges do result in a contravention of applicable State water quality standards for the receiving stream(s) or other waters impacted or affected by the Permittee.*
8g.	Are inspections of the site being performed and documented on a regular basis?					NPDES General Permit ALR100000 Part III H 3(a) - (i). *A site inspection shall consist of a complete and comprehensive observation of the entire construction site including all areas of land disturbance, areas used for storage of materials that are exposed to precipitation, equipment storage and maintenance areas, affected ditches and other stormwater conveyances, as well as all outfalls, receiving waters and stream banks to determine if, and ensure that: (i) Effective erosion controls and sediment controls have been fully implemented and maintained in accordance with this permit, the site CBMPP, and the Alabama Handbook; (ii) Pollutant discharges are being prevented/ minimized, and (iii) Discharges do result in a contravention of applicable State water quality standards for the receiving stream(s) or other waters impacted or affected by the Permittee.*

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8h.	If the construction project requiring an NOI is complete, has a Notice of Termination (NOT) been submitted to ADEM (after review and concurrence from the Environmental Division)?					NPDES General Permit ALR100000 Part IV S. 1. *The Permittee must submit a Notice of Termination (NOT) in a format acceptable to the Department within thirty (30) days of one of the following conditions: (a) Final stabilization as defined in Part V has been achieved on all portions of the site; (b) Another operator has assumed control over all areas of the site that have not achieved final stabilization and the new operator has submitted an NOI for coverage under this permit; or (c) Coverage under an individual permit or alternative general permit has been obtained. 2. The NOT shall include: (a) The Permittee name, permit number, and location of the site, and (b) Certification by the Permittee and the QCP that all construction activity covered by this permit has been completed and final stabilization has been achieved, or (c) Identification, including complete contact information, of the person that has assumed legal or operational control over the construction site.*
8i.	Are stormwater outfalls and discharges free from evidence of discharge or oils or other regulated materials/wastes?					Fort Rucker Permit Number AL0002178. All stormwater discharges must be free of sheen and visible oil, floating solids, or visible foam in other than trace amounts.

9 - Stormwater - Industrial					**POC: Allison Marshall, 334-255-1658, allison.t.marshall.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
9a.	Are stormwater outfalls and discharges free from evidence of discharge or oils or other regulated materials/wastes?					Fort Rucker Permit Number AL0002178. All stormwater discharges must be free of sheen and visible oil, floating solids, or visible foam in other than trace amounts.

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9b.	Is preventive maintenance performed on equipment as specified in the BMP Plan?					BMP Plan, Section 6.2. *Preventive maintenance BMPs include the following activities:Preventive maintenance BMPs include the following activities:* *• Examine equipment, operational systems, and stormwater control devices for proper operation.* *• Conduct equipment maintenance as prescribed by applicable technical manuals.* *• Repair or replace damaged, broken, defective, or outdated equipment and systems.* *• Inspect OWS for build-up of oils, fuels, and sediments. If separators must be cleaned, take the appropriate steps to schedule cleaning as defined in ENV-WA004: Washrack and Oil Water Separator Operation and Maintenance.* *• Schedule periodic tests of tanks, pumps, and piping at bulk fuel storage areas as specified within the SPCC Plan.* *• Maintain records on inspections and testing of equipment and systems.*
9c.	Are secondary containment areas inspected following each rain event and any discharges of collected water document on AVCOE Form 2716?					BMP Plan, Section 6.3. *After each significant rain event, operators inspect secondary containment areas to ensure that no petroleum, oil, and lubricant (POL) or other hazardous materials are released to the environment with the collected stormwater. These inspections are documented on AVCOE Form 2716, Secondary Containment Draining Activity Log.*
9d.	Are spill prevention and response BMPs implemented in a manner to be protective of stormwater?					BMP Plan Section 6.4. *The following spill prevention and response BMPs are required to be implemented to identify, reduce, and eliminate spills.* *• Provide leak detection devices and overflow controls as specified in the SPCC Plan* *• Store all containers of oil 55-gallons or larger and all containers of liquid hazardous waste with adequate secondary containment* *• Use material transfer procedures that reduce the chance of leaks or spills* *• Ensure spill response equipment is easily accessible and all personnel are familiar with its location* *• Inspect containers as specified within the SPCC Plan and HWMP*

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10 - Air					**POC: Melissa Lowlavar, 334-255-1659,melissa.g.lowlavar3.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
10a.	Are all aerospace paint booth manometers currently in good working order?					40 CFR 63.751 (c). *Dry particulate filter, HEPA filter, and waterwash systems - primer, topcoat, and specialty coating application operations. (1) Each owner or operator using a dry particulate filter system to meet the requirements of 40 CFR 63.745(g)(2) shall, while primer, topcoat, and specialty coating application operations are occurring, continuously monitor the pressure drop across the system and read and record the pressure drop once per shift following the recordkeeping requirements of 40 CFR 63.752(d), or install an interlock system as specified in 40 CFR 63.745(g)(2)(iv)(C).*
10b.	Is there a log for recording daily pressure readings at each aerospace paint booth?					
10c.	For each aerospace paintbooth, Is there a log for recording daily use of all specialty coatings, including top coats, primers, and strippers?					40 CFR 63.752 (c) (2). For uncontrolled primers, topcoats, and specialty coatings that meet the organic HAP and VOC content limits in 40 CFR 63.745(c)(1) through (c)(6) without averaging: (i) The mass of organic HAP emitted per unit volume of coating as applied (less water) (Hi) and the mass of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Gi) for each coating formulation within each coating category used each month (as calculated using the procedures specified in 40 CFR 63.750(c) and (e)); (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the values of Hi and Gi; and (iii) The volume (gal) of each coating formulation within each coating category used each month. 40 CFR 63.752 (c) (3). For “low HAP content” uncontrolled primers with organic HAP content less than or equal to 250 g/l (2.1 lb/gal) less water as applied and VOC content less than or equal to 250 g/l (2.1 lb/gal) less water and exempt solvents as applied: (i) Annual purchase records of the total volume of each primer purchased; and (ii) All data, calculations, and test results (including EPA Method 24 results) used in determining the organic HAP and VOC content as applied. These records shall consist of the manufacturer's certification when the primer is applied as received, or the data and calculations used to determine Hi if not applied as received. 40 CFR 63.752 (c) (4). (4) For primers, topcoats, and specialty coatings complying with the organic HAP or VOC content level by averaging: (i) The monthly volume-weighted average masses of organic HAP emitted per unit volume of coating as applied (less water) (Ha) and of VOC emitted per unit volume of coating as applied (less water and exempt solvents) (Ga) for all coatings (as determined by the procedures specified in 40 CFR 63.750(d) and (f)); andb(ii) All data, calculations, and test results (including EPA Method 24 results) used to determine the values of Ha and Ga.

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10d.	Are solvent containers, including parts washers, BECCA cleaners, and original product containers, kept closed when not in use?					40 CFR 63.751 (a): *Enclosed spray gun cleaners. Each owner or operator using an enclosed spray gun cleaner under 40 CFR 63.744(c)(1) shall visually inspect the seals and all other potential sources of leaks associated with each enclosed gun spray cleaner system at least once per month. Each inspection shall occur while the system is in operation.* *40 CFR 63.744 Standards: Cleaning operations. (a) Housekeeping measures. Each owner or operator of a new or existing cleaning operation subject to this subpart shall comply with the requirements in these paragraphs unless the cleaning solvent used is identified in Table 1 of this section or or meets the definition of "Non-HAP material" in 40 CFR 63.742. (1) Unless the owner or operator satisfies the requirements in paragraph (a)(4) of this section, place used solvent-laden cloth, paper, or any other absorbent applicators used for cleaning in bags or other closed containers. Ensure that these bags and containers are kept closed at all times except when depositing or removing these materials from the container. Use bags and containers of such design so as to contain the vapors of the cleaning solvent. Cotton-tipped swabs used for very small cleaning operations are exempt from this requirement. (2) Unless the owner or operator satisfies the requirements in paragraph (a)(4) of this section, store fresh and spent cleaning solvents, except semi-aqueous solvent cleaners, used in aerospace cleaning operations in closed containers.*

11 - Observations					**POC: Julie Majors, 334-255-1653, julie.p.majors.civ@army.mil**	
	Question	**YES**	**NO**	**NA**	**Comments**	**Citation**
11a.	Observations during this inspection.					Please contact DPW-ENRD with any questions regarding this inspection.