FORT RUCKER
Environmental Document

ENV-SW010: Contractor Hazardous Waste Management
(01 OCTOBER 2026)

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1.0 PURPOSE

This procedure defines the requirements for managing hazardous waste generated by contractors temporarily working on Fort Rucker.

Control of environmental procedures is addressed in procedure ENV-P002: Document Control.

2.0 SCOPE

This procedure applies to all contractors that generate hazardous waste who are working temporarily on the installation. Contractors working on the installation long-term as part of regular installation operations (i.e., aviation maintenance contractor, base service support contractor) should refer to management procedures within the Hazardous Waste Management Plan.

3.0 DEFINITIONS

Term	Definition
Accumulation Start Date (ASD)	The date the container is filled and/or meets the accumulation threshold.
Accumulation Threshold	55-gallons for hazardous waste or 1-quart for acutely hazardous waste
ADEM	Alabama Department of Environmental Management
DPW-ENRD	Directorate of Public Works, Environmental and Natural Resources Division, located in Bldg. 1121, telephone number 334-255-0487.
Hazardous Waste	A solid waste that is not specifically excluded or exempted in ADEM Administrative Code 335-14-2-.01(4)(a)-(b) and that is a listed waste in ADEM Administrative Code 335-14-2 and/or exhibits a characteristic of hazardous waste as defined in ADEM Administrative Code 335-14-2-.03.
HWCAA	Hazardous Waste Central Accumulation Area
HWSAA	Hazardous Waste Satellite Accumulation Area Where the hazardous waste is generated and collected in the workplace.

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4.0 RESPONSIBILITIES

4.1 Contractors

It is the responsibility of each contractor to follow proper procedures for hazardous waste management in accordance with federal and state regulations and this work instruction. Contractors are responsible for paying any fines resulting from noncompliance.

4.2 DPW-ENRD

DPW-ENRD will provide additional guidance as necessary to help ensure compliance with hazardous waste regulations. DPW-ENRD will periodically perform inspections to validate conformance with this procedure. Updates to this procedure will be made by DPW-ENRD as necessary.

5.0 PROCEDURE

5.1 Waste Determination

5.1.1 Contractors will identify all waste that may be generated prior to starting work on the installation. The contractor will work with DPW-ENRD to assess whether any of the waste that may be generated is hazardous waste in accordance with ADEM regulations.

5.1.2 If it is determined that the contractor is expected to generate hazardous waste, they must coordinate with DPW-ENRD prior to commencement of operations to set up a hazardous waste satellite accumulation area (HWSAA). If hazardous waste is generated that was not part of the planning process, the contractor must immediately notify DPW-ENRD.

5.1.3 All contractors must follow federal and state regulations for management of hazardous waste. This procedure is not a replacement for reading and following the regulations. This procedure provides a summary of the requirements for proper management for operations generally conducted on Fort Rucker.

5.2 Waste Accumulation Time

5.2.1 All hazardous waste must be accumulated in a HWSAA that is at or near the point of generation and that is under the control of the operator. The HWSAA must be secured to prevent unauthorized access. The only waste that should go into the HWSAA container is waste determined by DPW-ENRD to be hazardous waste. If a different type of waste is generated, then the contractor must immediately notify DPW-ENRD.

5.2.2 Waste may be accumulated in a HWSAA until the container is filled or when the waste exceeds the accumulation threshold (55-gallons for hazardous waste or 1-quart for acutely hazardous waste). When the waste meets the accumulation threshold or the container becomes full, the contractor must write the date the container is filled on the container as the accumulation start date, and the waste must be transferred to a Hazardous Waste Central Accumulation Area (HWCAA) within three days.

5.2.3 The contractor will need to have prepared an AVCOE Form 2758, *Containerized Waste Turn-In Form*, to turn in with the waste container at the HWCAA. Contact DPW-ENRD for assistance in preparing the AVCOE Form 2758.

5.2.4 There are three HWCAA locations that contractors can utilize depending on the location of work being performed. They are the following:

- Main Post HWCAA (Bldg. 1207)
- Cairns Field HWCAA (between Hangars 30103 and 30104)
- Shell Army Heliport HWCAA (Bldg. 60127)

Waste generated at Cairns and Shell must be turned into the HWCAA located at Cairns and Shell, respectively. At no time will the contractor transport hazardous waste across state roads as this is a violation of federal and state regulations.

5.3 Container Requirements

All hazardous waste must be accumulated in containers that meet the following requirements:

5.3.1 The container the waste is accumulated in must be a DOT approved shipping container. The container must be sized appropriately for waste to be generated. For example, if it is anticipated that only a gallon of waste will be generated, a 5-gallon container should be used for accumulation rather than a 55-gallon drum. Fort Rucker must pay for waste disposal based on the size of the container not the weight. Contact DPW-ENRD for assistance if needed.

5.3.2 The container must be compatible with the type of waste being accumulated in the container.

5.3.3 DPW-ENRD will provide the contractor with prefilled labels for the waste containers. Only put waste in the container that has been identified for that HWSAA.

5.3.4 Segregate containers of incompatible waste:

- Segregate reactive waste from ignitable waste
- Segregate acids from caustics
- Segregate corrosive waste from flammable waste
- Segregate oxidizers from all other waste

5.3.5 Containers of highly flammable liquid waste must be grounded.

5.3.6 Ensure that containers are always kept closed during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary. Protect containers from direct sunlight and inclement weather.

5.3.7 Maintain containers in good condition – free of rust, dents, holes, or other defects that may compromise the integrity of the container.

5.3.8 Situate containers on a pallet or other device that allows inspection of all sides of the container.

5.3.9 All containers of liquid waste must have secondary containment that is able to hold the entire contents of the container plus 10% freeboard.

5.3.10 Containers must not be overfilled. In accordance with DOT requirements, liquid waste should only be stored in bung-type drums or cans. In order to allow for expansion of liquid waste resulting from temperature fluctuations and to prevent overflowing, the following headspace guidelines are recommended:

- 55-gallon drum should have 3 to 4 inches of headspace
- 5-gallon cans should have 1.5 to 2 inches of headspace
- 1-gallon cans should have 1 inch of headspace

5.4 Inspection Requirements

5.4.1 All containers that are in the workplace accumulating hazardous waste for longer than 7 days must be visually inspected weekly using AVCOE Form 2725, *HWSAA Inspection Checklist*.

5.4.2 Any deficiencies noted during these inspections should be immediately corrected or submitted to the supervisor for further action. Contractors should contact DPW-ENRD if they have questions regarding any deficiencies.

5.4.3 Personnel conducting the weekly inspections must attend one of Fort Rucker's HWSAA Manager training classes. The training schedule can be found at the Sustainable Fort Rucker website under the training tab.

5.5 Training Requirements

5.5.1 Federal and state regulations require that all personnel managing or handling hazardous waste must be trained, either through classroom instruction or on-the-job-training, to respond to emergencies, protect the environment, and properly handle and dispose of hazardous wastes. The regulatory requirements for training may be found in the ADEM Administrative Code 335-14-3-.01(7)(a)(7.).

5.5.2 Facility personnel whose duties have a direct effect on hazardous waste management and/or hazardous waste accumulation, whether by direct contact with the hazardous waste or through hazardous waste management activities, must receive training. Each person managing or handling hazardous waste must receive introductory and annual update hazardous waste training corresponding with his/her responsibilities. The annual update training must be completed within 365 days of the previous training.

5.5.3 The introductory training must be completed within six months of the date on which the employee begins work in a position requiring such training. Employees must be immediately and continuously supervised when performing hazardous waste duties until such training is completed.

5.5.4 At a minimum, all supervisors and managers of hazardous waste activities will take a training course that meets required standards. It is their responsibility to ensure that personnel working for them are trained either in formal courses or in-house using on-the-job-training and "shop level" classes to meet the regulatory requirements.

5.5.5 Training records must be maintained for three years after the personnel cease working for the contractor.

5.5.6 Copies of annual Fort Rucker training certificates, individual job descriptions, and training forms will be kept at each site that operates a HWSAA. Organizations should use AVCOE Form 2735, *Hazardous Waste Job Description and Training Record*, to document training related to hazardous waste specific to their job responsibilities. This form is not required if the organization has an equivalent method for tracking their training, such as a database that includes a job description and information on the training received. The Hazardous Waste Program Manager will make the determination as to whether the documentation is equivalent to AVCOE Form 2735. Approval of the usage of a different form must be in writing and kept on file with the training records.

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5.6 Spill Prevention and Response

5.6.1 Site Specific Spill Plan. Each organization using hazardous materials and generating hazardous waste must complete AVCOE Form 2719, *Site Specific Spill Plan*, which is available on the Sustainable Fort Rucker website. It is also referenced in the Installation Spill Contingency Plan (ISCP). The organization must have a hard copy readily available at each location that stores hazardous material and/or hazardous waste.

5.6.2 Spill Response. In the event that hazardous material or hazardous waste spills or leaks, the contractor must notify the Fire Department (call 911). The contractor is responsible for ensuring it is properly cleaned up in accordance with guidance from the Fire Department and DPW-ENRD.

Spill residue that contains hazardous material or hazardous waste should be managed in accordance with the requirements in Sections 5.3 and 5.4. If the waste is waiting for laboratory analysis, the container should be marked PENDING ANALYSIS, dated with the date the sample was taken and turned into the HWCAA.

5.6.3 Spill residue that is or may potentially be a hazardous waste must not be removed from the installation without a manifest signed by authorized personnel within DPW-ENRD.

6.0 FORMS AND RECORDS

EPA Form 8700-22, *Uniform Hazardous Waste Manifest*
AVCOE Form 2719, *Site Specific Spill Plan*
AVCOE Form 2725, *HWSAA Inspection Checklist*
AVCOE Form 2726, *HWCAA Inspection Log*
AVCOE Form 2758, *Containerized Waste Turn-In Form*

7.0 REFERENCES

Sustainable Fort Rucker website: www.fortrucker-env.com
ENV-P002: Document Control
Hazardous Waste Management Plan (HWMP)
Installation Spill Contingency Plan (ISCP)

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