21.A. Fort Richardson shall determine if the waste located at buildings 986, 955, 704, 740, 974, A Co 813th Bat., 726, 27-641 and 950 is hazardous waste and comply with 40 CFR 262.11.

Response:

Knowledge of the waste and/or chemical analysis were used to determine whether these wastes were hazardous wastes. Those which were oil and fuel products were field screened, then consolidated and tested. After passing the lab test, the fuel was sold to a fuel contractor and the oil was shipped to Fort Wainwright for energy reutilization.

The wastes which were determined to be hazardous were turned in through the DRMO (see attached documents).

The wastes at building 704 have been tested by AEHA, but the lab results have not yet been received. These wastes will be disposed of when the lab results are obtained.

21. B. and E. Fort Richardson shall conduct weekly inspections at 45-125 and comply with 40 CFR 265.174 and shall not store hazardous waste for greater than 90 days in areas that have not been permitted for storage or granted interim status.

Response:

A weekly inspection log is now being maintained at 45-125 which includes the date and time of the inspection, the name of the inspector and comments. (A copy of the latest inspection log is attached.)

All attempts are being made to educate the generators about proper turn in procedures so that waste will not be stored at their facilities for more than 90 days. Quarterly inspections have been implemented by the Environmental Branch to identify problem areas and help the generators get their waste turned in in a timely manner.

21.C. Fort Richardson shall label drums containing hazardous waste at buildings 955, 704, 740, 796 and 47-431 and comply with 40 CFR 262.34(a)(3).

Response:

The drums at buildings 955, 704, 740, 796 and 47-432 (requirement lists wrong building #) were properly labeled before turn-in was accomplished. The drums at building 704 have not been labeled yet because, as indicated in the response to 21.A., the lab results have not yet been received. As soon as the lab results are received, the drums will be properly labeled and turned-in.

21.D. Fort Richardson shall mark containers of hazardous waste with the "accumulation state date" at building 955, 704, and 796 and comply with 40 CFR 262.34(a)(2). Fort Richardson shall label containers with the date received into storage at building 45125 as required by 40 CFR 268.50(a)(2)(i).

Response:

Fort Richardson is marking containers of hazardous waste with the "accumulation start date" at buildings 955, 704, and 796 and labeling containers with the date received into storage at building 45125.

21. F. Fort Richardson shall transfer the hazardous waste from a container in poor condition or manage waste in a way to comply with part 265 at buildings 45-125 and 704 as required by 40 CFR 265.171.

Response:

Waste at both buildings has been transferred into serviceable containers. As containers become unserviceable, further transfers will be made until turn in is accomplished.

21. G. Fort Richardson shall close containers holding hazardous waste when not in use at buildings 700 and 704.

Response:

Fort Richardson is closing containers holding hazardous waste when not in use at buildings 700 and 704.

21. H. Fort Richardson shall notify the treatment, storage, and disposal facility of the appropriate treatment standards and applicable prohibitions as required by 40 CFR 268.7(a).

Response:

As of 31 December 1990, Fort Richardson completes a land ban notification to accompany any manifest sent from Fort Richardson. Prior to that date, the land ban notifications were completed by the DRMO when the waste was shipped. Attached is a copy of a land ban notification prepared by Fort Richardson Environmental Office.

21.I. Fort Richardson shall cease taking hazardous waste from building 726 and any other building to the Hiland Road Landfill. Fort Richardson shall submit a report indicating measures to correct this violation and explain what will be done to prevent it from recurring.

Response:

Fort Richardson has ceased taking hazardous waste from building 726 to the Hiland Road Landfill. The attached documents show waste received from this facility since they were told to cease putting it in their dumpster. This is a GOCO facility, and the contract renewal now incorporates by reference the requirements of Army Regulation 200-1, Environmental Protection and Enhancement, and 6th ID(L) Regulation 420-4, Standard Operating Procedures (SOP) for Treatment, Storage, and Disposal of Hazardous Waste, which delineate appropriate disposal methods.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

September 25, 1990

Directorate of Engineering and Housing

U.S. Environmental Protection Agency
Region X
Waste Management Branch
Mail Stop HW-112
1200 Sixth Avenue
Seattle, Washington 98101

Dear Sir:

Enclosed are the original Applications for a Hazardous Waste Permit - Part A for Fort Richardson and Fort Greely, Alaska. A copy of the application for Fort Wainwright is also enclosed. The original has been sent to Battle Creek, Michigan, to be signed by the operator of the facility, and will be forwarded to you as soon as possible.

We are also sending a copy of these applications to Mr. Jeffery L. Koch, Chief of Solid and Hazardous Waste Management Section, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you have any questions, please contact Cristal Tosecook, Environmental Engineer, (907) 384-0338, extension 110.

Sincerely,

for John Wilson

Edwin B. Rudd
Colonel, U.S. Army
Director of Engineering and Housing

Enclosures

21.J. Fort Richardson shall cease storing additional hazardous waste at building 704 for greater than 90 days.

Response:

Fort Richardson has ceased storing additional hazardous waste at building 704 for greater than 90 days. The wastes which are at building 704 are presently being identified through AEHA. When this waste is removed, any additional waste deposited will be noticed immediately and be treated as an illegal disposal activity. Personnel at building 704 have been advised of proper disposal procedures.

21. K. Fort Richardson shall cease storing hazardous waste at building 45-590 for greater than 90 days.

Response:

Fort Richardson has ceased storing hazardous waste at building 45-590.

21. L. Fort Richardson shall segregate incompatible wastes as required by 40 CFR 265.177(c) at building 798.

Response:

Fort Richardson is segregating incompatible wastes at building 798.

21.M. Fort Richardson shall submit a revised Part A application that indicates all waste types generated at the facility.

Response:

The revised Part A application was submitted to the EPA Region X Waste Management Branch on 25 September 1990, a copy of the transmittal letter and the revised Part A are attached.

CLOSURE PLAN, POST-CLOSURE PLAN
AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR 270.14(b)(13). 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure plan (40 CFR 270.14(b)(13)

This plan identifies all steps that will be necessary to completely close the Fort Richardson open burn/open detonation (OB/OD) site.

The Fort Richardson Environmental Office will maintain a copy of the approved closure plan, and of all revisions to the plan. Revisions will be submitted for approval to the EPA Regional Administrator and the Alaska Department of Environmental Conservation whenever any modifications are made to the existing equipment, structure, instruments or procedures related to the management of the facility or when required by regulatory changes.

a. Closure Performance Standard (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls after closure. It will minimize threats to human health and the environment upon completion of closure.

All surface explosive material will be removed from the site at closure and the site will then be capped. Escape of hazardous waste or hazardous waste constituents will be monitored through use of monitoring wells. Leachate will be dealt with if it occurs.

b. Partial Closure and final closure Activities (40 CFR 264.115)

(1) There is no partial closure for this site.

(2) Certification that final closure of the hazardous waste treatment facility has been accomplished in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The Engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the Regional Administrator of the EPA and the Alaska Department of Environmental Conservation (ADEC). Submittal of certification will be made within 60 days of final closure.

c. Maximum Waste Inventory (40 CFR 264.112(b)(3))

At a maximum, 6000 pounds of hazardous waste were treated at this facility in one day. The facility was used 12- 18 times per year. Burn and detonation residue were left at the facility after each use. The facility was cleared of visible surface contamination annually.

d. Closure Time

(1) Schedule for Closure (40 CFR 264.112(b)(6))
Fort Richardson anticipates closure of this site upon approval

of this plan. The closure will have to be coordinated with the Eagle River Flats study, due to the close proximity of the OB/OD area to the Flats.

Notification of intent to close will be sent 60 days before beginning final closure of the site to the Regional Administrator of the EPA and the the ADEC. Final closure will be supervised and certified by an independent registered professional engineer.

Table 1 presents an estimated closure schedule which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

(2) Extensions for Closure Time (40 CFR 264.113 (a) and (b))

A. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close the OB/OD site, or, if it becomes inappropriate to complete closure in that time frame, then a petition would be sent at least 30 days prior to the effected closure period(s). The petition will be sent to the Regional Administrator of the EPA and to the ADEC Central Office. The petition would by definition demonstrate the need for more than 180 days to complete removal of all residual contamination.

B. The petition would also demonstrate that all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements, have and will be taken.

e. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPA Regional Administrator and the ADEC Central Office, and shall be in compliance with state and Federal Regulations.

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

TABLE 1

ESTIMATED CLOSURE SCHEDULE FOR OB/OD SITE

ACTIVITY	DAYS
1. Closure plan implemented	0
2. Conduct range clearance	1-7
3. Cap as a landfill.	7-90
4. Dig monitoring wells	90-180
5. Completion of Closure and certification submittal	180

22. E. Fort Richardson shall cease all OB/OD activities until permitted for such. Fort Richardson shall formally withdraw the Part B, Subpart X application and submit a closure/post closure plan.

RESPONSE:

Fort Richardson has withdrawn Subpart X to the Part B application. (letter attached).

Closure/Post Closure plan is attached.

document number and manifest number into the Operating Record and the Dbase III document register. The document number will be placed on the respective containers to be shipped. [illegible]

(5) The Environmental Coordinator will maintain files of the 1348-1 receipt documents and the receipt manifests in the Operating Record when a material has been manifested. The Environmental Coordinator will insure that a copy of the 1348-1s for Manifested Hazardous Waste are forwarded to 6 ID Finance.

(3) The [illegible] person will contact the Fort Gordon Environmental Coordinator [illegible] and request pick up for removal from the unit or organization.

(4) The unit or organization will not [illegible] the accumulation point or Fort Gordon will not [illegible] person and confirms the container, labeling, and condition of the [illegible] for subsequent [illegible]. The [illegible] the accumulation [illegible] the container, and labeling necessary for safe transportation [illegible]

[illegible]

[illegible]

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

March 1, 1991

Directorate of Engineering and Housing

Mr. Charles Findley
Hazardous Waste Division
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Findley:

At this time, Fort Richardson formally requests withdrawal of Subpart X of the Fort Richardson Part B Permit application. Open burn/open detonation operations will not be conducted at Fort Richardson.

Fort Greely requests withdrawal of the Part B Permit application filed previously. This includes a cessation of all open burn/open detonation operations. Fort Greely is considered a small quantity generator.

A copy of this letter is being sent to Mr. Dave Tetta, (HW-122), U.S. Environmental Protection Agency, Seattle, Washington; Mr. Kurt Eilo, U.S. Environmental Protection Agency, Anchorage, Alaska; and Mr. Jeff Mach, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you require additional information, please contact Catherine Scott, Environmental Scientist, Environmental Resources Branch, 863-3295, extension 182.

Sincerely,

John T Torres

for Edwin R. Ruff
Colonel, U.S. Army
Director of Engineering and Housing
6th Infantry Division (Light)
and U.S. Army Garrison, Alaska

f. Closure Procedures

1. No additional ordnance will be accepted for treatment. The site will have all surface debris removed using EOD range clearance protocols. All unexploded ordnance will be blown in place.

2. Sampling of the wells will be conducted by trained personnel. The services of those personnel will be obtained at the time of closure notification through DOD contractual procedures.

3. The contractor who does the sampling and analytical testing will be required to:

a. Have an established quality assurance/ quality control program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. (EPA Office of Solid Waste, EPA Publication #SW-846), and;

b. Provide the State and EPA with sampling and test protocols for approval before any work is accomplished.

4. Water sample test parameters are described in Table 2.

g. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

h. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

i. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

j. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

k. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

Monitoring of the wells will continue semi-annually for as long as the Army maintains Fort Richardson and for 30 years thereafter

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

22.C,F,G,H,I,J, and K
These paragraphs require sampling of drums located at 45-590, the Auto Craft Shop, Circle Drive Drum Storage Site, DEH Preventative Maintenance oil/water separator, 35-752 and building 704, and disposal of the waste located at the sites. Paragraph K provides for an extension to the time limits if requested.

Response: Samples were taken in October 1990, results have not yet been received. At this time, Fort Richardson requests a 60-day extension be granted for these tasks. Draft Closure/Post Closure Plans are included at response to Paragraph 22.B.

22. L. Fort Richardson shall submit a Waste Analysis Plan.

RESPONSE:

The Waste Analysis plan is intended to be part of the Part B application submittal. A copy of it is attached.

Building	Max (gallons)
704	15,000
45-125	20,000
Auto Craft Shop	600
Circle Drive Drum Site	2,000
Preventive Maint. O/W sep.	100
35-752	1,500

during the operational life of each facility.

D. Closure Time

1. Schedule for Closure (40 CFR 264.112(b)(6))

a. Building 45-125 is an integral part of the operation of Fort Richardson. It is not anticipated that closure will occur, however, a closure date of 2039 is estimated.

Notification of intent to close will be sent 60 days before beginning final closure of this unit to the EPARA and to the ADEC. Final closure will be supervised by an independent registered professional engineer.

Upon receipt of the final volume of hazardous waste, closure activities will be initiated. Table presents an estimated schedule for closure which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

b. The other sites, i.e., buildings 704, 35-752, the Auto Craft Shop, Circle Drive Drum site and the DEH Preventive Maintenance shop are unpermitted storage facilities, and as such, closure will begin upon approval of this plan.

2. Extensions for Closure Time (40 CFR 264.113(a) and (b))

a. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close a unit, then a petition will be sent to the EPARA and the ADEC. The petition would by definition demonstrate the following items:

(1) Removal of Hazardous Waste

(a) The need for more than 90 days to remove wastes received at the facility prior to commencement of closure activities, or

(b) The facility has the capacity to receive additional waste, and

(c) There is a reasonable likelihood that another person will recommence operation of the unit within the year, and

(d) Closure of the unit would be incompatible with continued operation of the site.

(2) Completion of Closure activities

(a) The need for more than 180 days to close the facility, or

(b) The facility has the capacity to store additional waste (as above).

b. The petition would also demonstrate that all steps to prevent threats to human health and the environment, to include compliance with all applicable permit requirements. have and will be taken.

c. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPARA and the ADEC, and shall be in compliance with state and federal regulations.

E. Inventory Disposal, Removal and Decontamination of Equipment (40 CFR 264.114)

Each unit can be closed seperately or simultaneously.

Upon formal notification to proceed with unit(s) closure, no additional hazardous property will be accepted at the storage unit(s). All hazardous waste/property remaining in inventory will be removed in accordance with Defense Reutilization and Marketing Office procedures. If this process cannot be accomplished within the allotted time for closure, the hazardous property will be transferred to a permitted TSD site on Fort Richardson. The unit(s) will be inspected for loose items, i.e. papers, pallets or empty containers after the final inventory of waste is removed. These items will be removed and properly disposed of.

Decontamination procedures, sampling and analytical testing will be conducted by trained personnel. The services of these personnel will be obtained at the time of closure notification through DA contractual procedures.

The contractor who does the sampling and analytical testing will be required to:

1. Have an established QA/QC program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods , EPA Office of Solid Waste, EPA Publication #SW-846 (as revised).

2. Use sampling methods in accordance with a site-specific work plan developed by the contractor, and approved by the

EPA and ADEC.

3. Decontaminate equipment between samples using an appropriate solvent, followed by 3 rinses with distilled water then air dried, or by an alternate approved method.

4. Use test methods listed in table 2. Reference provides estimated detection limits, and specifies the maximum sample holding times. For a wipe sample, a blank will be run on filter paper that was not wiped on a surface. The filter paper wipe samples will be extracted using a method from SW-846 or TCLP in appendix I of 40 CFR 268 before being analyzed.

Records searches will be conducted before the work plan is finalized to determine locations and types of spills which have occurred in the unit to be closed. Buildings will be inspected for cracks in the floor or signs of deterioration in the containment system. This record review and unit inspection will determine the need to modify sampling and test parameters.

	FACILITY	PARAMETERS
(a)	Building 704	Petroleum products Solvents (hallogenated, aromatic and aliphatic) PCBs Heavy Metals (paint related)
(b)	Auto Craft Shop	Same as (a) above
(c)	Circle Drive Site	Same as above and Pesticides/herbicides
(d)	DEH Preventive Maintenance Shop	Same as (a) above
(e)	35-752	Same as (a) above
(f)	45-125	All TCLP parameters PCB Characteristic waste Parameters listed in (a)

Trained personnel wearing appropriate levels of protection will remove and clean up all visible signs of contamination. Sampling, to include swipe tests, soil borings and surface soil testing will then be conducted. Results will be used to establish the extent of the contamination and appropriate cleanup methods.

F. Closure of Containers (40 CFR 264.178)

All containers will be sealed and labeled prior to shipment in accordance with 40 CFR parts 261 and 262. Manifests for container removal will be maintained by the Fort Richardson Environmental Office.

G. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

H. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

I. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

J. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

K. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

A post-closure plan will not be needed because this site will be completely decontaminated before closure is certified. Contamination that can not be removed within the listed time frame will result in extension of the closure time, not in post-closure monitoring.

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

21. Q. Fort Richardson shall continue the current assessment of the Eagle River Flats Area.

RESPONSE:

Fort Richardson is continuing the study of Eagle River Flats. Relevant findings are shared with the members of the Eagle River Flats Task Force, which includes the EPA and the DEC. The relevant findings of the study will be used to facilitate closure of the OB/OD area adjacent to it.

22. A. Fort Richardson shall submit a written job description for every position related to hazardous waste management, and the job title and name of the employee filling each job.

RESPONSE:

This information is included under the response to paragraph 21. O.

22.B. Fort Richardson shall submit, for EPA approval, the closure/post closure plans for building 704.

Response:

A draft closure plan is attached for all the sites identified in this compliance agreement, except the OB/OD area, which is addressed at 22.E.

CLOSURE PLAN, POST CLOSURE PLAN AND FINANCIAL REQUIREMENTS

This plan is submitted in accordance with the requirements of 40 CFR 270.14 (b) (13), 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure Plan (40 CFR 270.14(b)(13))

This plan identifies the steps necessary to completely close the hazardous waste management units located on Fort Richardson at buildings 704, 45-125, the Auto Craft Shop, the former auto craft Shop, 35-752 and Circle Drive drum site.

Fort Richardson Environmental Office will maintain a copy of the approved closure plan and of all revisions to the plan. Revisions will be submitted to the EPA Regional Administrator and the Alaska Department of Environmental Conservation (ADEC) whenever any modifications are made to the existing equipment, structures, instruments, or procedures related to the management of the facility or when required by regulatory changes.

A. Closure Performance Standards (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls. It will minimize and eliminate threats to human health and the environment on completion of closure.

All wastes will be removed from the storage unit at closure and the unit will then be completely decontaminated, thus requiring no further maintenance. No escape of hazardous waste constituents should occur after closure, as all on-site hazardous waste will be removed from the facility at closure.

B. Partial Closure and Final Closure Activities (40 CFR 264.115)

Partial Closure is the closure of a unit/building.

Certification that final closure of the hazardous waste storage facility has been done in accordance with with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the EPA and the ADEC. Submittal of certification will be made within 60 days of final closure.

C. Maximum Waste Inventory (40 CFR 264.112(b)(3))

The following quantities are the maximum quantities of waste stored at each facility:

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

22.D. Fort Richardson shall submit a drum management plan designed to track and identify the contents and source of all drums on the facility.

Response:

The draft drum management plan for Fort Greely is attached. If this plan is approved by EPA, it will be implemented, with appropriate changes, at all three installations.

22. E. Fort Richardson shall cease all OB/OD activities until permitted for such. Fort Richardson shall formally withdraw the Part B, Subpart X application and submit a closure/post closure plan.

RESPONSE:

Fort Richardson has withdrawn Subpart X to the Part B application. (letter attached).

Closure/Post Closure plan is attached.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

March 1, 1991

Directorate of Engineering and Housing

Mr. Charles Findley
Hazardous Waste Division
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Findley:

At this time, Fort Richardson formally requests withdrawal of Subpart X of the Fort Richardson Part B Permit application. Open burn/open detonation operations will not be conducted at Fort Richardson.

Fort Greely requests withdrawal of the Part B Permit application filed previously. This includes a cessation of all open burn/open detonation operations. Fort Greely is considered a small quantity generator.

A copy of this letter is being sent to Mr. Dave Tetta, (HW-122), U.S. Environmental Protection Agency, Seattle, Washington; Mr. Kurt Eilo, U.S. Environmental Protection Agency, Anchorage, Alaska; and Mr. Jeff Mach, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you require additional information, please contact Catherine Scott, Environmental Scientist, Environmental Resources Branch, 863-3295, extension 132.

Sincerely,

for John T. Toerner

Edwin R. Ruff
Colonel, U.S. Army
Director of Engineering and Housing
6th Infantry Division (Light)
and U.S. Army Garrison, Alaska

CLOSURE PLAN, POST-CLOSURE PLAN
AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR 270.14(b)(13). 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure plan (40 CFR 270.14(b)(13)

This plan identifies all steps that will be necessary to completely close the Fort Richardson open burn/open detonation (OB/OD) site.

The Fort Richardson Environmental Office will maintain a copy of the approved closure plan, and of all revisions to the plan. Revisions will be submitted for approval to the EPA Regional Administrator and the Alaska Department of Environmental Conservation whenever any modifications are made to the existing equipment, structure, instruments or procedures related to the management of the facility or when required by regulatory changes.

a. Closure Performance Standard (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls after closure. It will minimize threats to human health and the environment upon completion of closure.

All surface explosive material will be removed from the site at closure and the site will then be capped. Escape of hazardous waste or hazardous waste constituents will be monitored through use of monitoring wells. Leachate will be dealt with if it occurs.

b. Partial Closure and final closure Activities (40 CFR 264.115)

(1) There is no partial closure for this site.

(2) Certification that final closure of the hazardous waste treatment facility has been accomplished in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The Engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the Regional Administrator of the EPA and the Alaska Department of Environmental Conservation (ADEC). Submittal of certification will be made within 60 days of final closure.

c. Maximum Waste Inventory (40 CFR 264.112(b)(3))

At a maximum, 6000 pounds of hazardous waste were treated at this facility in one day. The facility was used 12- 18 times per year. Burn and detonation residue were left at the facility after each use. The facility was cleared of visible surface contamination annually.

d. Closure Time

(1) Schedule for Closure (40 CFR 264.112(b)(6))
Fort Richardson anticipates closure of this site upon approval

of this plan. The closure will have to be coordinated with the Eagle River Flats study, due to the close proximity of the OB/OD area to the Flats.

Notification of intent to close will be sent 60 days before beginning final closure of the site to the Regional Administrator of the EPA and the the ADEC. Final closure will be supervised and certified by an independent registered professional engineer.

Table 1 presents an estimated closure schedule which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

(2) Extensions for Closure Time (40 CFR 264.113 (a) and (b))

A. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close the OB/OD site, or, if it becomes inappropriate to complete closure in that time frame, then a petition would be sent at least 30 days prior to the effected closure period(s). The petition will be sent to the Regional Administrator of the EPA and to the ADEC Central Office. The petition would by definition demonstrate the need for more than 180 days to complete removal of all residual contamination.

B. The petition would also demonstrate that all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements, have and will be taken.

e. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPA Regional Administrator and the ADEC Central Office, and shall be in compliance with state and Federal Regulations.

TABLE 1

ESTIMATED CLOSURE SCHEDULE FOR OB/OD SITE

ACTIVITY	DAYS
1. Closure plan implemented	0
2. Conduct range clearance	1-7
3. Cap as a landfill.	7-90
4. Dig monitoring wells	90-180
5. Completion of Closure and certification submittal	180

f. Closure Procedures

1. No additional ordnance will be accepted for treatment. The site will have all surface debris removed using EOD range clearance protocols. All unexploded ordnance will be blown in place.

2. Sampling of the wells will be conducted by trained personnel. The services of those personnel will be obtained at the time of closure notification through DOD contractual procedures.

3. The contractor who does the sampling and analytical testing will be required to:

a. Have an established quality assurance/ quality control program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. (EPA Office of Solid Waste, EPA Publication #SW-846), and;

b. Provide the State and EPA with sampling and test protocols for approval before any work is accomplished.

4. Water sample test parameters are described in Table 2.

g. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

h. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

i. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

j. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

k. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

Monitoring of the wells will continue semi-annually for as long as the Army maintains Fort Richardson and for 30 years thereafter

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

22.C,F,G,H,I,J, and K
These paragraphs require sampling of drums located at 45-590, the Auto Craft Shop, Circle Drive Drum Storage Site, DEH Preventative Maintenance oil/water separator, 35-752 and building 704, and disposal of the waste located at the sites. Paragraph K provides for an extension to the time limits if requested.

Response: Samples were taken in October 1990, results have not yet been received. At this time, Fort Richardson requests a 60-day extension be granted for these tasks. Draft Closure/Post Closure Plans are included at response to Paragraph 22.B.

G. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

H. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

I. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

J. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

K. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

A post-closure plan will not be needed because this site will be completely decontaminated before closure is certified. Contamination that can not be removed within the listed time frame will result in extension of the closure time, not in post-closure monitoring.

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

CLOSURE PLAN, POST CLOSURE PLAN AND FINANCIAL REQUIREMENTS

This plan is submitted in accordance with the requirements of 40 CFR 270.14 (b) (13), 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure Plan (40 CFR 270.14(b)(13))

This plan identifies the steps necessary to completely close the hazardous waste management units located on Fort Richardson at buildings 704, 45-125, the Auto Craft Shop, the former auto craft Shop, 35-752 and Circle Drive drum site.

Fort Richardson Environmental Office will maintain a copy of the approved closure plan and of all revisions to the plan. Revisions will be submitted to the EPA Regional Administrator and the Alaska Department of Environmental Conservation (ADEC) whenever any modifications are made to the existing equipment, structures, instruments, or procedures related to the management of the facility or when required by regulatory changes.

A. Closure Performance Standards (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls. It will minimize and eliminate threats to human health and the environment on completion of closure.

All wastes will be removed from the storage unit at closure and the unit will then be completely decontaminated, thus requiring no further maintenance. No escape of hazardous waste constituents should occur after closure, as all on-site hazardous waste will be removed from the facility at closure.

B. Partial Closure and Final Closure Activities (40 CFR 264.115)

Partial Closure is the closure of a unit/building.

Certification that final closure of the hazardous waste storage facility has been done in accordance with with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the EPA and the ADEC. Submittal of certification will be made within 60 days of final closure.

C. Maximum Waste Inventory (40 CFR 264.112(b)(3))

The following quantities are the maximum quantities of waste stored at each facility:

Building	Max (gallons)
704	15,000
45-125	20,000
Auto Craft Shop	600
Circle Drive Drum Site	2,000
Preventive Maint. O/W sep.	100
35-752	1,500

during the operational life of each facility.

D. Closure Time

1. Schedule for Closure (40 CFR 264.112(b)(6))

a. Building 45-125 is an integral part of the operation of Fort Richardson. It is not anticipated that closure will occur, however, a closure date of 2039 is estimated.

Notification of intent to close will be sent 60 days before beginning final closure of this unit to the EPARA and to the ADEC. Final closure will be supervised by an independent registered professional engineer.

Upon receipt of the final volume of hazardous waste, closure activities will be initiated. Table presents an estimated schedule for closure which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

b. The other sites, i.e., buildings 704, 35-752, the Auto Craft Shop, Circle Drive Drum site and the DEH Preventive Maintenance shop are unpermitted storage facilities, and as such, closure will begin upon approval of this plan.

2. Extensions for Closure Time (40 CFR 264.113(a) and (b))

a. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close a unit, then a petition will be sent to the EPARA and the ADEC. The petition would by definition demonstrate the following items:

(1) Removal of Hazardous Waste

(a) The need for more than 90 days to remove wastes received at the facility prior to commencement of closure activities, or

(b) The facility has the capacity to receive additional waste, and

(c) There is a reasonable likelihood that another person will recommence operation of the unit within the year, and

(d) Closure of the unit would be incompatible with continued operation of the site.

(2) Completion of Closure activities

(a) The need for more than 180 days to close the facility, or

(b) The facility has the capacity to store additional waste (as above).

b. The petition would also demonstrate that all steps to prevent threats to human health and the environment, to include compliance with all applicable permit requirements. have and will be taken.

c. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPARA and the ADEC, and shall be in compliance with state and federal regulations.

E. Inventory Disposal, Removal and Decontamination of Equipment (40 CFR 264.114)

Each unit can be closed seperately or simultaneously.

Upon formal notification to proceed with unit(s) closure, no additional hazardous property will be accepted at the storage unit(s). All hazardous waste/property remaining in inventory will be removed in accordance with Defense Reutilization and Marketing Office procedures. If this process cannot be accomplished within the allotted time for closure, the hazardous property will be transferred to a permitted TSD site on Fort Richardson. The unit(s) will be inspected for loose items, i.e. papers, pallets or empty containers after the final inventory of waste is removed. These items will be removed and properly disposed of.

Decontamination procedures, sampling and analytical testing will be conducted by trained personnel. The services of these personnel will be obtained at the time of closure notification through DA contractual procedures.

The contractor who does the sampling and analytical testing will be required to:

1. Have an established QA/QC program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods , EPA Office of Solid Waste, EPA Publication #SW-846 (as revised).

2. Use sampling methods in accordance with a site-specific work plan developed by the contractor, and approved by the

EPA and ADEC.

3. Decontaminate equipment between samples using an appropriate solvent, followed by 3 rinses with distilled water then air dried, or by an alternate approved method.

4. Use test methods listed in table 2. Reference provides estimated detection limits, and specifies the maximum sample holding times. For a wipe sample, a blank will be run on filter paper that was not wiped on a surface. The filter paper wipe samples will be extracted using a method from SW-846 or TCLP in appendix I of 40 CFR 268 before being analyzed.

Records searches will be conducted before the work plan is finalized to determine locations and types of spills which have occurred in the unit to be closed. Buildings will be inspected for cracks in the floor or signs of deterioration in the containment system. This record review and unit inspection will determine the need to modify sampling and test parameters.

	FACILITY	PARAMETERS
(a)	Building 704	Petroleum products Solvents (hallogenated, aromatic and aliphatic) PCBs Heavy Metals (paint related)
(b)	Auto Craft Shop	Same as (a) above
(c)	Circle Drive Site	Same as above and Pesticides/herbicides
(d)	DEH Preventive Maintenance Shop	Same as (a) above
(e)	35-752	Same as (a) above
(f)	45-135	All TCLP parameters PCB Characteristic waste Parameters listed in (a)

Trained personnel wearing appropriate levels of protection will remove and clean up all visible signs of contamination. Sampling, to include swipe tests, soil borings and surface soil testing will then be conducted. Results will be used to establish the extent of the contamination and appropriate cleanup methods.

F. Closure of Containers (40 CFR 264.178)

All containers will be sealed and labeled prior to shipment in accordance with 40 CFR parts 261 and 262. Manifests for container removal will be maintained by the Fort Richardson Environmental Office.

22. L. Fort Richardson shall submit a Waste Analysis Plan.

RESPONSE:

The Waste Analysis plan is intended to be part of the Part B application submittal. A copy of it is attached.

Table 2

Metals

Antimony
Beryllium
Cadmium
Copper
Lead
Nickel
Silver
Thallium
Zinc
Mercury
Arsenic
Selenium

Mustard related compounds

Thiodiglycol
Organosulfur
p-chlorophenylmethyl sulfone
p-chlorophenylmethyl sulfoxide

***Lewisite related compounds**

Arsenic

***Sarin (GB) related compounds**

Explosives and Explosive Residues

Nitrobenzene
1,3 Dinitrobenzene
1,3,5 Trinitrobenzene
2,4 Dinitrotoluene
2,6 Dinitrotoluene
2,4,6 Trinitrotoluene
RDX
Tetryl

Other

Cyanides
Nitrates

triple based propellant

HHB 6TH DIVISION ARTILLERY
HAZARDOUS WASTES/HAZARDOUS MATERIALS
(HW/HM)

PERSONNEL TRAINED OFF/NCO/BNL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/2/1	YES	YES	0	19 APR 90	

FROM 16 OCT TO 15 NOV

1ST BATTALION, (ABN) 501ST INFANTRY REGT
HAZARDOUS WASTES/HAZARDOUS MATERIALS

DATE Nov

PERSONNEL TRAINED OFF/NCO/BNL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/3/1	YES	YES	Ø	3 MAY 90	SATISFACTORY

"GERONIMO"
MAINTENANCE EXCELLENCE PRODUCES
COMBAT READINESS

4-11th FIELD ARTILLERY REGIMENT
HAZARDOUS WASTES/HAZARDOUS MATERIALS
(HW/HM)

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/2/1	YES	YES	0	8 MAY 1990	JOB # PL0016 (HAZ WASTE STORAGE BUILDING)

FROM 16 OCT TO 15 NOV

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT/MC DESCOM

FROM Oct 90 TO 15 Nov 90

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/4/2	YES	YES	None	15 FEB 90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

100th MI BN

FROM 16 OCT TO 15 NOV 90

PERSONNEL TRAINED OFF/NCO/ENL.	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2/4/1	YES	YES	NONE	19 APR 90 (DEH)	1 Officer, 2 NCO'S attended class 23 Aug 90

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT/AIR SIGNAL BN

FROM 16 Oct TO 15 Nov

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2 / 12 / 1	YES	YES	0	24 July 90 (LSD)	

CMH-0

HAZARDOUS WASTES/HAZARDOUS MATERIALS
(HW/HM)

5-H FAR

FROM: 16 OCT TO: 15 NOV

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2 / 4 / 2	YES	YES	0	22 OCT 90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

2D BDE

FROM 16 OCT 90 TO 15 NOV 90

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2/12/0	YES	YES	0	1 JUN 90	SATISFACTORY RATING ON INSPECTION

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 0 0A1 0DL

FROM 16 OCT 90 TO 15 NOV 90

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1 / 6 / 2	YES	YES	NONE	17 JAN 90	CERTIFIED JUN 90

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 98TH MAINT FROM 16 OCT TO 15 NOV

PERSONNEL TRAINED OFF/WO/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
4 / 0 / 70 / 100	YES	YES		NOV 90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT HHC 8th Inf Div (L) FROM 16 OCT TO 15 NOV

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1 / 3 / 0	YES	YES	NONE	28 MAR 90	NO DEFICIENCIES NOTED

HAZARDOUS WASTES/HAZARDOUS MATERIALS
(HW/HM)

UNIT 6th Engr

FROM 16 Oct TO 15 Nov

	PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
6th Engr	2 / 14 / 0	YES	YES	Ø	19 Oct 90	
23rd Engr	1 / 2 / 0	YES	YES	Ø	12 Apr 90	
47th Engr	1 / 8 / 0	YES	YES	Ø	29 Oct 90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

UNIT: SPECIAL TROOPS BN FROM 16 OCT 90 TO 15 NOV 90

PERS TRNED OFF/NCO/ENL	STORAGE SITE IDENT	SOP	SPILLS	DATE LAST INSPECTION	REMARKS
1 / 2 / 1	YES	YES	Ø	11 April 90 DOL	Area was clean and well organized

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT MC DISCOM

FROM Oct 90 TO 15 Nov 90

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/4/2	YES	YES	None	15 FEB 90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 4-123 FROM 16 Oct TO 15 Nov

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
3/8/4	YES	YES	NONE	2 APR 90 (EPA)	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 706th MtBn FROM 16 OCT TO 15 NOV

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
5/8/3	YES	YES		17 MAY 90 (DEN)	

1ST BATTALION, 17th INFANTRY REGIMENT
HAZARDOUS WASTES/HAZARDOUS MATERIALS

DATE NOV

PERSONNEL TRAINED OFF/NCO/EML	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2-1-1	YES	YES	Ø	MAY 90	INSPECTED BY SPC PARKER SATISFACTORY

"STRIKE FEAR"
MAINTENANCE EXCELLENCE PRODUCES
COMBAT READINESS

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

[illegible]

[illegible]

PERIODICALLY MARKED OFF/CHECKED	SIGNAGE ESTABLISHED	SUMMARY MAP	FLUID SPILL(S)	DATE OF LAST SPILL	REMARKS
2/7/12	Yes	Yes	NO	18Sept90	

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT C-22B

FROM 16 OCT TO [illegible]

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/4/1	YES	YES	NO	16 JUNE	

HAZARDOUS WASTES/HAZARDOUS MATERIALS
(HW/HM)

UNIT 111C AWWDE

FROM 16 Oct TO 15 Nov 90

PERSONNEL TRAINED OFF/NCO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/ /Ø	Yes	Yes	Ø	1 May 90 LSD Insp	

2

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 4-9 Cavalry Squadron

FROM 16 Oct TO 15 Nov

PERSONNEL TRAINED OFF/NOO/ENL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
2/7/10	yes	yes	ø	23 Apr 9ø	

HHC 1ST BRIGADE
HAZARDOUS WASTES/HAZARDOUS MATERIALS

DATE NOV

PERSONNEL TRAINED OFF/HCO/EHL	STORAGE SITE IDENT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
Ø/2/Ø	YES	YES	NONE	13APR90	NFN

'ARCTIC RAIDERS'
MAINTENANCE EXCELLENCE PRODUCES
COMBAT READINESS

HAZARDOUS WASTES/HAZARDOUS MATERIALS

(HW/HM)

UNIT 16th MP Co

FROM 16 OCT 90 TO 15 NOV 90

PERSONNEL TRAINED OFF/NCO/ENL.	STORAGE SITE INSPT.	CURRENT SOP	FLUID SPILL(S)	DATE OF LAST INSP.	REMARKS
1/3/1	yes	yes	None	14 sep 90	pass

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT WAINWRIGHT, ALASKA 99703-5000

CATHY

REPLY TO ATTENTION OF:

APVR-LG (1)

MEMORANDUM FOR Director of Engineering and Housing, United States Army Garrison, Alaska, Fort Richardson, Alaska 99505

SUBJECT: Commander's Maintenance Review (CMR) Summary Charts for Hazardous Waste and Hazardous Material

1. The Division conducted a Command Maintenance Review (CMR) on 29 November 1990 (NOR) and 30 November 1990 (SOR).

2. Enclosed are the summary sheets for Hazardous Waste.

3. Point of contact for this office is SSM Jones/MAJ Peterson, ADCFS, G4 Maintenance, 353-2270/2333.

WILLIAM E. WARD
LTC, GS
Assistant Chief of Staff, G4

Encl

RECEIVED
DEC 18 1990
IW
Please Ship Mr. J. W. 19 Dec 90

* 10 MINUTE BREAK

* REVIEW QUIZ

* THE BURIAL GROUND - Movie

* HOW TO PREPARE FOR TURN-INs by Jane Smith

  REVIEW 6TH INF DIV (L) REG 420-4
  LABELING CONTAINERS - Para 3-2, Pg 3-1
  APPENDIX C FOR COMPLETING DD FORM 1348-1 - Pg C-1
  APPENDIX E FOR PROPER SHIPPING NAMES - Pg E-1
  APPENDIX F FOR WASTE NUMBERS - Pg F-1

* PROBLEM #1 - PARTICIPATION

* PROBLEM #2 - CLASS

* PROBLEM #3 - INDIVIDUAL

* CLOSING STATEMENTS by Jane Smith/Cristal Fosbrook
  INSPECTION CHECKLIST
  COURSE CRITIQUE
  CERTIFICATES

HAZARDOUS WASTE MANAGERS COURSE OUTLINE

* INTRODUCTION
  TOPICS AND OBJECTIVES

* OVERVIEW OF WHY RCRA WAS DEVELOPED by Cristal Fosbrook

* INTRODUCTION TO RCRA - Movie

* HOW TO IDENTIFY HAZARDOUS MATERIALS/HAZARDOUS WASTES by Jane Smith

* TEST

* 10 MINUTE BREAK

* REVIEW TEST (QUESTIONS & ANSWERS)

* STORAGE REQUIREMENTS OF HAZARDOUS MATERIALS/HAZARDOUS WASTES by Jane Smith

  ACCUMULATION POINTS
  OVERVIEW OF DRUM LABELING
  CLOSED DRUMS
  FEES FOR NONCOMPLIANCES
  SEGREGATION

* SPILLS by Cristal Fosbrook

  CALL IMMEDIATELY
  WHAT CONSTITUTES A SPILL
  SPILLS HAPPEN

* HAZARDOUS WASTE MINIMIZATION by Cristal Fosbrook and Jane Smith

  HOW IT AFFECTS OUR INSTALLATION
  RECYCLE SOLVENT - DCL SPERS SHOP, BLDG 974,
    POC: CLYDE GILBREATH, 883-9187
  UNIT SOP GUIDELINES
  DESIGNATION OF HM/HW MANAGERS FOR EACH AREA/WASTE STREAMS
  POSTING OF SOPs IN SHOP
  POSTING OF HM/HW MANAGERS IN SHOPS
  WASTE PROFILE SHEETS
    MANDATORY 1 DEC 90 - FOR ITEMS SUCH AS DS-2, STB, & CDE
    EQUIPMENT

* QUIZ

TRAINING PLAN
6TH INFANTRY DIVISION (LIGHT) AND US ARMY GARRISON, ALASKA

1. Every unit or activity which generates hazardous waste will have a hazardous waste manager appointed in writing. This hazardous waste manager is required to be certified annually through attendance at the 4-hour hazardous waste management class taught quarterly by the DEH Environmental Branch. This hazardous waste manager is required to teach the personnel at his or her unit or activity proper handling and storage of the hazardous materials and wastes. The manager is further required to be capable of turning in any waste generated.

2. A quarterly inspection will be conducted by the DEH, Environmental Resources Branch to assess the compliance status of all generators. This inspection will also serve as an assistance visit during which regulatory changes will be addressed and compliance problems will be identified and solved. Inspection results will be sent to the first O-5 (Lieutenant Colonel) in the chain of command.

3. Commanders will brief Post and Division Commanders about hazardous waste/material as part of the semiannual Command Maintenance Review (CMR) briefing . This briefing will show how many personnel have received the required training, whether there have been any spills in the applicable period, and the date of their last inspection.

DOUGLAS W. JOHNSON
Chief, Environmental
Resources Branch

22. M. Fort Richardson shall submit a Hazardous Waste training plan to assure that personnel on a military rotational schedule will receive hazardous waste training as required by 40 CFR 262.34(5)(iii) and 40 CFR 265.16.

RESPONSE:

The hazardous waste training plan is identical for all three posts. The training classes were implemented in October of 1989, and have been taught regularly since then. The inspections were implemented at approximately the same time. Attached are:

1. The Hazardous Waste Handler training plan for 6th Infantry Division (Light).

2. A course outline for the Hazardous Waste Handler's Course.

3. Copies of briefing charts used in the most recent CMR briefing.

3.5.3 Sample Containers

All sample containers will be purchased from a specialty container distributor such as I-Chem, Inc. of Hayward, California. The containers will be pre-cleaned by the distributor and will have Teflon-lined lids. Table 3-11 lists the container requirements for the samples.

3.5.4 Chain of Custody Procedures

Strict chain of custody procedures will be maintained during the sample collection and transportation to the laboratory. The sample containers will be sealed at the time of collection with signed and dated sample custody seals. The sampler will complete a chain of custody report that will accompany each shipment to the laboratory and will track the samples. An example Chain of Custody Report and Sample Custody Seal are presented in Appendix D.

3.5.5 Sample Preservation and Holding Time Requirements

Table 3-11 lists the preservation and holding time requirements for the waste samples to be collected at Fort Richardson.

All wastes stored at the HWCSA for a period longer than one year will be resampled and analyzed for the parameters listed in the Waste Analysis Plan at least once per year to verify the contents and concentrations of constituents.

3.5 SAMPLING METHODS

All waste containers will be sampled using EPA-approved methods. The specific method for sampling of the waste will be dependent upon whether the waste is a liquid, sludge, or solid, and the type of container it is in. The following subsections describe the sample methods and procedures that will be used to collect the waste samples.

3.5.1 Sample Collection Methods

Drums

Only non-sparking tools will be used to open drums containing potential ignitable wastes.

All drums containing liquids will be sampled using either a pre-cleaned borosilicate glass Colivasa drum sampler or a pre-cleaned borosilicate glass drum thieving rod. The sampling device will be lowered into the waste slowly, allowing the waste to enter the tube as it is lowered to the bottom of the container. The waste will be trapped in the sampling device either by sealing the bottom of the Colivasa with the inside tube or by sealing the top orifice of the drum thieve with a finger. The sample will then be transferred directly into the sampling container.

Sludges

Sludges will be collected using stainless steel sampling tools where the consistency of the waste is too viscous for flow into a Colivasa or drum thieve. In these instances, the sampler will collect portions of the sludge from several locations in the container to ensure that a

Table 3-10 (Cont.)

SAMPLE ANALYTICAL METHODS/PROCEDURES
FORT RICHARDSON, ALASKA

Method Reference	Method Number	Brief Description of Method	Matrix (S/W)	Method Detection Limit	% Spike Recovery	Control Sample Recovery	RPD Duplicates
Zinc							
EPA	200.7	ICP	W	10 µg/L	75-125	80-120	20
SW	6010	ICP	W	10 µg/L	75-125	80-120	20
SW	6010	ICP	S	1.0 mg/kg	75-125	--	35
Base/Neutral/Acid Extractables							
SW	8270	Extraction, GC/MS	S/W	**	**	**	**
Volatile Organic Compounds							
SW	8240	Purge & Trap, GC/MS	S/W	**	**	**	**
PCBs							
SW	8080	Extraction, GC/ECD	S/W	**	**	**	**
Color							
	--	Visual Inspection	S/W	--	--	--	--
Physical State							
	--	Visual Inspection	S/W	--	--	--	--
Cyanides							
SW (14d)	9010	Colorimetric	S	0.02 mg/L	75-125%	90-100%	±35%
EPA NaOH to pH>12	335.1	Titrimetric, Spectrophometric	W	1 mg/L			±20%
Sulfides							
SW	9030	Titrimetric	S	.2 mg/kg	75-125	90-100	±35%
EPA	376.1, 376.2	Colorimetric	W	1 mg/L			±20%
Phenolics							
SW	8040	GC/FID	S/W	**	**	**	**

Table 3-10 (Cont.)

SAMPLE ANALYTICAL METHODS/PROCEDURES
FORT RICHARDSON, ALASKA

Method Reference	Method Number	Brief Description of Method	Matrix (S/W)	Method Detection Limit	% Spike Recovery	Control Sample Recovery	RPD Duplicates
Copper							
EPA	200.7	ICP	W	10 µg/L	75-125	80-120	20
SW	6010	ICP	W	10 µg/L	75-125	80-120	20
SW	6010	ICP	S	1.0 mg/kg	75-125	--	35
Iron							
EPA	200.7	ICP	W	25 µg/L	75-125	80-120	20
SW	6010	ICP	W	25 µg/L	75-125	80-120	20
SW	6010	ICP	S	2.5 mg/kg	75-125	--	35
Lead							
EPA	239.2	Furnace AA	W	5 µg/L	75-125	80-120	20
EPA	200.7	ICP	W	50 µg/L	75-125	80-120	20
SW	7421	Furnace AA	W	5 µg/L	75-125	80-120	20
SW	7421	Furnace AA	S	0.5 mg/kg	75-125	--	35
SW	6010	ICP	W	50 µg/L	75-125	80-120	20
SW	6010	ICP	S	5.0 mg/kg	75-125	--	35
Magnesium							
EPA	200.7	ICP	W	1,000 µg/L	75-125	80-120	20
SW	6010	ICP	W	1,000 µg/L	75-125	80-120	20
SW	6010	ICP	S	100 mg/kg	75-125	--	35
Manganese							
EPA	200.7	ICP	W	5 µg/L	75-125	80-120	20
SW	6010	ICP	W	5 µg/L	75-125	80-120	20
SW	6010	ICP	S	0.5 mg/kg	75-125	--	35
Mercury							
EPA	245.1	Manual Cold Vapor	W	0.2 µg/L	75-125	80-120	20
SW	7470	Cold Vapor-Liquid	W	0.2 µg/L	75-125	80-120	20
SW	7471	Cold Vapor-Liquid	S	0.10 mg/kg	75-125	--	35

Table 3-10

SAMPLE ANALYTICAL METHODS/PROCEDURES
FORT RICHARDSON, ALASKA

Method Reference	Method Number	Brief Description of Method	Matrix (S/W)	Method Detection Limit	% Spike Recovery	Control Sample Recovery	RPD Duplicates
Petroleum Hydrocarbons							
SW	9070	Gravimetric, Separatory	S	5 mg/L	--	--	--
SW	9071	Funnel Extraction					
TOX	EPA 413.1	Gravimetric, IR	W	5 mg/L	--	--	--
SW	9020	Carbon Absorption	S/W	5 µg/L	80-120	95-105	20
Flash Point							
ASTM	Standard D-93-79, 80			--	--	--	--
TCLP							
40 CFR	261.24	Modified Extraction Procedure	S	**	**	**	**
Corrosivity							
SW	9040	pH Electrometric	W	±0.1 su	--	--	5
SW	9045	pH Electrometric water or 0.01 M $CaCl_2$ added	S	±0.1 su	--	--	5
Aluminum							
EPA	200.7	ICP	W	100 µg/L	75-125	80-120	20
SW	6010	ICP	W	100 µg/L	75-125	80-120	20
SW	6010	ICP	S	20 mg/kg	75-125	--	35
Antimony							
EPA	200.7	ICP	W	60 µg/L	75-125	--	20
SW	6010	ICP	W	60 µg/L	75-125	80-125	20
SW	6010	ICP	S	6 mg/kg	75-125	--	20

3.3 PROVISIONS FOR NEW WASTES OR MODIFIED WASTE GENERATION PROCESSES

All sections of the RCRA Parts A and B Permit Applications will be modified where applicable prior to storing any new waste (those not identified in Section 2.1.1.8) in the HWCSA. For new wastes, the generation processes will be characterized to identify waste properties and potential contaminants (a generator's audit), a waste analysis scheme will be developed based upon the audit, and the waste storage and disposal requirements will be determined based upon the analytical results.

The modification of a waste generation process will require that a generator's audit is conducted to document the process changes and to determine the effects on the characteristics and constituents of the waste generated. Based upon the audit, modifications to the waste analysis plan may be required. If the waste has been significantly altered, additional modifications to the RCRA permit may be required.

The EPA and Alaska Department of Environmental Conservation (DEC) will be notified in writing prior to any changes in the waste streams, waste storage schemes, or operating procedures. All changes will be approved by both agencies prior to their implementation.

3.4 VERIFICATION OF WASTE IDENTIFICATION AND CHARACTERISTICS

Since Fort Richardson generates, stores, and maintains custody of

annually at Fort Richardson. This quantity will vary as operations change over the years.

The wastes in unopened, original containers will not receive analysis of any kind. The MSDS will be used to determine the data needed to store, treat and dispose of the waste. When necessary, the MSDS will be obtained from the manufacturer.

The wastes in opened containers will be visually inspected for homogeneity, color, physical state and viscosity. If any of these do not match the description of the chemical names on the label, a sample will be taken to determine the purity of the waste. Analytical methods used will be as shown on Table 3-10.

3.1.13 Toxicity Characteristics Leaching Procedure (TCLP) Wastes

3.1.13.1 Historical Data and Waste Generation Information

The TCLP wastes are newly listed, therefore, no historical data exists for this class of waste. Soil removed from former spill sites is anticipated to be the majority of TCLP waste on Fort Richardson.

3.1.13.2 Treatment, Storage and Disposal Requirements

The anticipated waste is large quantities of soil taken from around USTs and spill sites. The soil will be stored in discrete piles at the old Fort Richardson landfill in a lined, bermed area made specifically for that pile. As the chemical analyses indicate what type of TCLP or other waste is present, remediation plans will be made for the pile. Chemically similar piles will receive similar treatment. Piles which

The nature and content of these batteries are well known and the treatment, storage and disposal of this waste stream requires no additional analytical data.

3.1.11. 2,4,5-TP (Silvex) Waste

3.1.11.1 Historical Data and Waste Generation Information

Approximately 175 gallons of Silvex were discovered at Fort Richardson and are stored as a waste at the HWCSA. No analytical data are available for this waste. The waste is presumed to be contaminated with Dioxin.

3.1.11.2 Treatment, Storage, and Disposal Requirements

At the present time, there are no disposal options available for Dioxin-contaminated waste. The Silvex waste will be stored at the HWCSA until a disposal option becomes available.

Data on the ignitability, toxicity, and components (in regards to potential carrier agents) are required to determine procedures for the safe transport and storage of the waste.

3.1.11.3 Analysis Parameters, Rationale, and Frequency

The Silvex waste will be analyzed for the following parameters:

- Flash Point - Wastes with flash points lower than 140 degrees Fahrenheit are ignitable wastes. The Silvex waste may contain a carrier agent such as a fuel.

TABLE 3-9

WASTE PAINTS (CONT.)

RESULTS OF PAST ANALYSIS OR ESTIMATED QUANTITY OF CONSTITUENTS

FORT RICHARDSON, ALASKA

Physical Characteristic	Reported Values
Physical State	Liquid to Sludge
Percent Solids	2-90%
Flash Point	<70-150° F
Density	9-1.4
pH	4-10

Source: Waste Product Questionnaire, Northwest Enviroservice, Inc., 1989.

3.1.8.3 Analysis Parameters, Rationale, and Frequency

The following analyses will be performed on the carbon remover waste to further characterize the nature of the material. The following analyses will be performed on all waste containers until the variability is completely described:

ignitable wastes.

- o Total Halogens - To [illegible]
- o pH - To assess the corrosivity.
- o Specific Gravity - As required by ChemPro and for fingerprint analysis.
- o Specific Gravity - As required by ChemPro and for fingerprint
- o TCL Metals - To assess the potential concentration of metals contamination as a result of parts cleaning operations.
- o Layering - As required by ChemPro. [illegible]
- o % Solids - To measure the content of potential sludges. [illegible]
- o Oils and Grease - To assess the content of oils and greases that may have been introduced during parts cleaning operations.

3.1.9 Waste Paint

3.1.9.1 Historical Data and Waste Generation Information

Vehicle and equipment painting operations occur throughout Fort Richardson at various locations. The majority of paint materials are expended in the operations, but some wastes result from paint materials that are outdated, frozen, or unusable. Approximately 600 gallons of paint wastes are generated at the facility annually. Paint wastes may be RCRA ignitable hazardous waste (D001) due to the flash points of solvents and thinners that are incorporated in the paint materials or a TCLP waste (D004) due to metals in pigments.

The paint waste materials consist of paint residues that are in the original material containers. Characterization of these wastes is conducted by examining the original container labels which lists the paint constituents and through the analysis of the waste. All available label information will be listed and will accompany the shipment. The paint containers will be packed in an overpack drum for shipment to the disposal location.

Limited past analytical data were obtained from the disposal contractor's Waste Product Questionnaire and are summarized in Table 3-9. The reported values are from all paint waste related

3.1.7.3 Analysis Parameters, Rationale, and Frequency

The following analysis will be performed on each PD-680 sludge waste container: [illegible]

- o Layering - As required by ChemPro.
- o Flash Point - Wastes with a flash point of 140°F or less are ignitable wastes.
- o Total Halogens - To assess the presence of halogens in the sludge. [illegible]
- o PCBs - To assess the presence of PCBs in the sludge.
- o Specific Gravity - As required by ChemPro and for fingerprint analysis [illegible]
- o % Solids - To measure the liquid content of the sludge.
- o Phenolics - As required by ChemPro and a potential contaminant.
- o pH - As required by ChemPro and to assess the corrosivity of the sludge.
- o Sulfides - As required by ChemPro and a potential contaminant in the sludge.
- o TCL Metals - To assess the metals contamination of the sludge as a result of parts cleaning operations. [illegible]

parts at several vehicle maintenance and repair shops at Fort [illegible]

3.1.8 Carbon Remover Waste

3.1.8.1 Historical Data and Generation Information

A carbon remover compound is used to clean and degrease automotive engine components at Building 796. Between 10 to 1,000 gallons of waste are generated annually from this process. [illegible]

No analytical data are available from past wastes produced. However, both physical characteristics and the composition of the waste were reported on the disposal contractor's Waste Product Questionnaire and are presented in Table 3-8.

Background information regarding the carbon remover waste indicates that it is likely not a RCRA hazardous waste. However, more data are required regarding metals concentrations.

3.1.8.2 Treatment, Storage, and Disposal Requirements

Data on the waste corrosivity is required to determine the procedures for the safe transport and storage of this waste.

Acetone wastes:

- Flash Point - All wastes with flash points below 140°F are ignitable wastes.
- Layering - As required by ChemPro.
- Specific Gravity - As required by ChemPro and for fingerprint analysis.
- % Solids - To measure of the quantity of sludges.
- TCL Metals - To assess the presence of metals that may be present due to paint materials.
- Phenolics - As required by ChemPro and to assess the presence of phenolics which may be present due to paint and epoxy materials.

3.1.7 Petroleum Naphtha (PD-680) Sludge

3.1.7.1 Historical Data and Generation Information

PD-680 is used as a parts degreaser for engine and drive train parts at several vehicle maintenance and repair shops at Fort Richardson. The raw material is used primarily in open parts-cleaning bins and is recycled through a settling process in the bin. The solvent is discarded when it becomes too laden with oils and solids to be effective. Approximately 1,650 gallons of PD-680 waste is generated annually on Fort Richardson.

A solvent recycling unit which produces a sludge waste (still bottom) was recently installed at the facility The sludge waste may be a RCRA ignitable hazardous waste because of its low flash point (D001) or a RCRA TCLP waste because of its metals concentrations. No analytical results from past sludge wastes are available. Limited physical characteristics were listed on the disposal contractor's Waste Product Questionnaire for the raw PD-680 waste and is summarized in Table 3-7.

3.1.7.2 Treatment, Storage, and Disposal Requirements

Data on the ignitability and corrosivity of the waste are required to determine procedures for the safe transport and storage of the PD-680 sludge waste.

3.1.6 Acetone Waste

3.1.6.1 Historical Data and Waste Generation Information

Acetone is used at Fort Richardson as a cleaning and degreasing solvent for surfaces in preparation for the application of paints. It is also used as a thinner for epoxy and resin coatings. Approximately 55 gallons of acetone wastes are generated annually at Fort Richardson. Spent acetone is a RCRA listed hazardous waste (F003).

No analytical data are available regarding past acetone wastes. Acetone will become contaminated with components of paint residues which include pigments, solvents, and thinners. Some volatilization of the solvent is expected. The content of residual pigments, solvents, and thinners is expected to be variable and dependent on the paints that were cleaned. Physical characteristics of this waste and a reported composition were listed on the disposal contractor's Waste Production Questionnaire and are presented in Table 3-6.

3.1.6.2 Treatment, Storage, and Disposal Requirements

Data on the ignitability of acetone waste is required to determine the requirements for the safe transport and storage of the waste.

3.1.6.3 Analysis Parameters, Rationale, and Frequency

The quantity of acetone waste produced annually is 55 gallons per year and does not warrant an intensive waste stream analysis program. The characterization of acetone waste will be conducted at the time the waste is produced and prior to the transport and storage at the EWCSA.

At a minimum, the following analyses will be performed on the

3.1.5 1,1,1-Trichloroethane (TCA) Waste

exceeded or if a container leaks or is corroded.

3.1.5.1 Historical Data and Waste Generation Information

1,1,1-Trichloroethane (TCA) is used as a degreasing and cleaning solvent for electrical components at Buildings 974 and 796. Approximately 310 gallons of waste are generated at the facility annually. The waste TCA is a RCRA listed hazardous waste because it is a spent halogenated solvent (F002).

No analytical data are available on the TCA waste. However, limited physical data and a waste composition were listed in the disposal contractor's Waste Product Questionnaire and are presented in Table 3-5.

3.1.5.2 Treatment, Storage, and Disposal Requirements

The safe transportation and storage of the TCA at the HWCSA will require no additional analytical information.

3.1.5.3 Analysis Parameters, Rationale, and Frequency of Analysis

The quantity of TCA waste produced annually is 310 gallons per year and does not warrant an intensive waste stream analysis program. The characterization of the TCA wastes will be conducted at the time when the wastes are produced at the generator's locations and prior to storage at the HWCSA.

At minimum, the following analyses will be performed on the TCA wastes:

- % Solids - As required by ChemPro and to measure the potential presence of sludges.
- Specific Gravity - As required by ChemPro and for fingerprint analysis.
- Phenolics - As required by ChemPro and a potential contaminant on the waste.
- PCB's - To assess the potential presence of PCB's in this waste from the cleaning of electrical components.
- Layering - As required by ChemPro.
- Color - As required by ChemPro.

stored at Fort Richardson and becomes a waste if the shelf life is exceeded or if a container leaks or is corroded. It is a RCRA corrosive hazardous waste (D002) because of its high pH. The generator for this material is the DOL Supply Warehouse located at Building 802/804.

Past analytical results from the disposal contractor's Waste Product Questionnaire are presented in Table 3-4.

3.1.4.2 Treatment, Storage, and Disposal Requirements

The storage of the DS2 waste is dependent upon the corrosivity of the material, its high metals concentrations.

3.1.4.3 Analysis Parameters, Rationale, and Frequency

Approximately 500 gallons of wastes are anticipated to be generated annually at Fort Richardson. The amounts of the waste components will not vary considerably in the waste stream. However, the physical characteristics and metals concentrations have shown some variability in the past. The following analysis parameters are proposed for all containers of this waste:

- o pH - Due to the high pH characteristic.
- o Cyanides - As required by ChemPro (a potential contaminant due to the presence of diethylenetriamine.
- o TCL Metals - A potential contaminant from the corrosion of the material containers.
- o Flash Point - To assess the ignitability of the waste.
- o Specific Gravity - As required by ChemPro and for fingerprint analysis.

Fort Richardson anticipates that the TCL metals, cyanides, and flash point analysis will be removed from this list of parameters at a later date when a sufficient amount of data have been generated to characterize the variability of the metals concentrations completely.

Richardson to ensure deactivation prior to the recycling of bullets and casings. The shells are ejected and transported to a contracted recycler for recovery of the lead and brass. The incinerator is an APE 1236 deactivation furnace with an air pollution control system kit (APE 1236-E010). It consists of a rotary kiln furnace. [illegible] waste. There is a cyclone and baghouse located in the exhaust train of the incinerator which acts to remove particulates from the exhaust stream. The incinerator ash is collected from the baghouse and cyclone and is likely a RCRA Target Compound Leaching Procedure (TCLP) hazardous waste (D008) due to its high metals concentrations. However, no conclusion can be drawn since no leaching tests (TCLP) for metals have been conducted at this time. [illegible]

Metals analysis data were obtained from the disposal contractor's Waste Product Questionnaire and is summarized in Table 3-3. [illegible]

- Layering - As required by Chem-Tro and to determine if water in [illegible]

3.1.3.2 Treatment, Storage, and Disposal Requirements

The incinerator ash waste is a solid material. No additional data is required for storage since the waste has been incinerated and is a stable material. [illegible]

3.1.3.3 Analysis Parameters, Rationale, and Frequency of Analysis

DEH will perform the following analysis on each year's waste accumulation: [illegible]

- TCLP Metals - To assess the levels of the metals in this waste to determine if it is a RCRA hazardous waste.
- Soil pH - To assess the acidity of the waste.

3.1.4 Diethylenetriamine (DS2)

3.1.4.1 Historical Data and Generation Information

DS2 is a decontamination material used for chemical warfare agents. It is composed of diethylenetriamine (75-80%), methyl glycol monoethylether (20-30%), and sodium hydroxide (1-3%). This material is

Product Questionnaire indicate potential contaminants, as listed in Table 3-2.

3.1.2.2 Treatment, Storage, and Disposal Requirements

Data on the waste's ignitability is required to determine the procedures for the safe storage and transportation of the paint thinner waste.

3.1.2.3 Analysis Parameters, Rationale, and Frequency

At a minimum, a sample will be collected from each waste container for the following analyses:

- o Flash Point - All wastes with flash points less than 140°F are ignitable wastes.
- o Color - As required by ChemPro.
- o Specific Gravity - As required by ChemPro and for fingerprint analyses.
- o Layering - As required by ChemPro and to determine if water is present.
- o TCL Metals - To assess the presence of metals in the waste due to paint pigments.
- o % Solids - As required by ChemPro and to determine the amount of sludge in the waste.
- o Semi-volatiles - To assess the presence of semivolatile compounds that may have been introduced into the wastes from the thinners and paint materials.
- o Volatile organics - To assess the presence of volatile compounds that may have been introduced into the wastes from the thinners and paint materials.
- o Phenolics - As required by ChemPro.
- o Sulfides - As required by ChemPro.

The analyses will be performed on each container of paint thinner waste at the generator's location prior to transport and storage at the HWCSA.

3.1.3 Incinerator Ash

3.1.3.1 Historical Data and Generation Information

Spent and live small-arms ordinance are incinerated at Fort

TABLE 3-1

METHYL ETHYL KETONE WASTE
RESULTS OF PAST ANALYSIS AND ESTIMATED
QUANTITY OF CONSTITUENTS
FORT RICHARDSON, ALASKA

Analytes	Reported Value Ranges
Arsenic	ND
Barium	ND
Cadmium	ND
Chromium	ND
Copper	ND
Lead	ND
Mercury	ND
Nickel	ND
Selenium	ND
Silver	ND
Zinc	ND
Amines	ND
Cyanides	ND
Sulfides	ND
PCB's	ND

Constituents	Reported Percentages
Methyl Ethyl Ketone	80-99%
Oil and Greases	<5%
Dirt	<2%
Paint Sludge	<20%

Physical Characteristics

Physical State	Liquid
Percent Solids	1-20%
Density	0.8-0.9
Flash Point	<70°F
Layering	Bilayered

ND = None Detected

Source: Waste Product Questionnaire, Northwest Enviroservice, Inc. 1989.

3. RCRA PART B PERMIT APPLICATION - WASTE ANALYSIS PLAN

The waste sampling and analysis plan has been prepared in accordance with 40 CFR 264.13. This plan presents all available data and information regarding each waste and presents the methods and rationale for the collection and analysis of hazardous waste which is required for the treatment, storage, and disposal of waste materials. Incorporated into this plan are methodologies for the collection of waste samples.

The disposal contractor for Fort Richardson's waste is Chemical Processing, Inc. (ChemPro) of Seattle, Washington. ChemPro requires a completed Generator's Waste Material Profile Sheet to be submitted with each waste. This form is presented in Appendix C. Several of the required sections will be completed based upon visual inspections of the waste (such as the color and layering) and knowledge of the waste (such as chemical composition). ChemPro also requires the generator to collect a representative sample of the waste to be disposed and submit it for their waste identification and verification analyses requirements. Information regarding this representative sample is presented in Appendix C.

This plan was prepared based upon the wastes and processes that were identified during a February 1990 hazardous waste inventory conducted at Fort Richardson. The plan also addresses procedures for the sampling and analysis of wastes that were not identified during that inventory, but that may be generated and stored at the facility in the future. All of the wastes listed in the RCRA Part A Permit Application (as updated) are included in this plan.

This plan will be amended as new waste generation processes are established at the facility or when the established processes (as described in this plan) are modified resulting in changes to the nature and composition of the wastes. Provisions for these amendments are addressed in Section 3-3.

22. L. Fort Richardson shall submit a Waste Analysis Plan.

RESPONSE:

The Waste Analysis plan is intended to be part of the Part B application submittal. A copy of it is attached.

Table 2

Metals	Explosives and Explosive Residues
Antimony	Nitrobenzene
Beryllium	1,3 Dinitrobenzene
Cadmium	1,3,5 Trinitrobenzene
Copper	2,4 Dinitrotoluene
Lead	2,6 Dinitrotoluene
Nickel	2,4,6 Trinitrotoluene
Silver	RDX
Thallium	Tetryl
Zinc	
Mercury	Other
Arsenic	
Selenium	Cyanides
	Nitrates
Mustard related compounds	
Thiodiglycol	
Organosulfur	
p-chlorophenylmethyl sulfone	
p-chlorophenylmethyl sulfoxide	
*Lewisite related compounds	
Arsenic	
*Sarin (GB) related compounds	triple based propellant

f. Closure Procedures

1. No additional ordnance will be accepted for treatment. The site will have all surface debris removed using EOD range clearance protocols. All unexploded ordnance will be blown in place.

2. Sampling of the wells will be conducted by trained personnel. The services of those personnel will be obtained at the time of closure notification through DOD contractual procedures.

3. The contractor who does the sampling and analytical testing will be required to:

a. Have an established quality assurance/ quality control program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. (EPA Office of Solid Waste, EPA Publication #SW-846), and;

b. Provide the State and EPA with sampling and test protocols for approval before any work is accomplished.

4. Water sample test parameters are described in Table 2.

g. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

h. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

i. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

j. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

k. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

Monitoring of the wells will continue semi-annually for as long as the Army maintains Fort Richardson and for 30 years thereafter

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

of this plan. The closure will have to be coordinated with the Eagle River Flats study, due to the close proximity of the OB/OD area to the Flats.

Notification of intent to close will be sent 60 days before beginning final closure of the site to the Regional Administrator of the EPA and the the ADEC. Final closure will be supervised and certified by an independent registered professional engineer.

Table 1 presents an estimated closure schedule which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

(2) Extensions for Closure Time (40 CFR 264.113 (a) and (b))

A. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close the OB/OD site, or, if it becomes inappropriate to complete closure in that time frame, then a petition would be sent at least 30 days prior to the effected closure period(s). The petition will be sent to the Regional Administrator of the EPA and to the ADEC Central Office. The petition would by definition demonstrate the need for more than 180 days to complete removal of all residual contamination.

B. The petition would also demonstrate that all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements, have and will be taken.

e. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPA Regional Administrator and the ADEC Central Office, and shall be in compliance with state and Federal Regulations.

TABLE 1

ESTIMATED CLOSURE SCHEDULE FOR OB/OD SITE

ACTIVITY	DAYS
1. Closure plan implemented	0
2. Conduct range clearance	1-7
3. Cap as a landfill.	7-90
4. Dig monitoring wells	90-180
5. Completion of Closure and certification submittal	180

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

March 1, 1991

Directorate of Engineering and Housing

Mr. Charles Findley
Hazardous Waste Division
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Findley:

At this time, Fort Richardson formally requests withdrawal of Subpart X of the Fort Richardson Part B Permit application. Open burn/open detonation operations will not be conducted at Fort Richardson.

Fort Greely requests withdrawal of the Part B Permit application filed previously. This includes a cessation of all open burn/open detonation operations. Fort Greely is considered a small quantity generator.

A copy of this letter is being sent to Mr. Dave Tetta, (HW-122), U.S. Environmental Protection Agency, Seattle, Washington; Mr. Kurt Eilo, U.S. Environmental Protection Agency, Anchorage, Alaska; and Mr. Jeff Mach, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you require additional information, please contact Catherine Scott, Environmental Scientist, Environmental Resources Branch, 863-3295, extension 132.

Sincerely,

John T. Toews
for
Edwin B. Ruff
Colonel, U.S. Army
Director of Engineering and Housing
6th Infantry Division (Light)
and U.S. Army Garrison, Alaska

CLOSURE PLAN, POST-CLOSURE PLAN
AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR 270.14(b)(13). 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure plan (40 CFR 270.14(b)(13)

This plan identifies all steps that will be necessary to completely close the Fort Richardson open burn/open detonation (OB/OD) site.

The Fort Richardson Environmental Office will maintain a copy of the approved closure plan, and of all revisions to the plan. Revisions will be submitted for approval to the EPA Regional Administrator and the Alaska Department of Environmental Conservation whenever any modifications are made to the existing equipment, structure, instruments or procedures related to the management of the facility or when required by regulatory changes.

a. Closure Performance Standard (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls after closure. It will minimize threats to human health and the environment upon completion of closure.

All surface explosive material will be removed from the site at closure and the site will then be capped. Escape of hazardous waste or hazardous waste constituents will be monitored through use of monitoring wells. Leachate will be dealt with if it occurs.

b. Partial Closure and final closure Activities (40 CFR 264.115)

(1) There is no partial closure for this site.

(2) Certification that final closure of the hazardous waste treatment facility has been accomplished in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The Engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the Regional Administrator of the EPA and the Alaska Department of Environmental Conservation (ADEC). Submittal of certification will be made within 60 days of final closure.

c. Maximum Waste Inventory (40 CFR 264.112(b)(3))

At a maximum, 6000 pounds of hazardous waste were treated at this facility in one day. The facility was used 12- 18 times per year. Burn and detonation residue were left at the facility after each use. The facility was cleared of visible surface contamination annually.

d. Closure Time

(1) Schedule for Closure (40 CFR 264.112(b)(6))
Fort Richardson anticipates closure of this site upon approval

document number and manifest number into the Operating Record and the Dbase III document register. The document number will be placed on the respective containers to be shipped. [illegible]

(5) The Environmental Coordinator will maintain files of the 1348-1 receipt documents and the receipt manifests in the Operating Record when a material has been manifested. The Environmental Coordinator will insure that a copy of the 1348-1s for Manifested Hazardous Waste are forwarded to 6 ID Finance.

(3) The [illegible] person will contact the [illegible] Environmental Coordinator [illegible] for removal from the unit or organization.

(4) The unit or organization will [illegible] accumulation point or [illegible] until the [illegible] person and confirms the container, label, and condition of the [illegible] material by subsequent [illegible]. The [illegible] and labels necessary for future identification [illegible]

[illegible]

[illegible]

22. E. Fort Richardson shall cease all OB/OD activities until permitted for such. Fort Richardson shall formally withdraw the Part B, Subpart X application and submit a closure/post closure plan.

RESPONSE:

Fort Richardson has withdrawn Subpart X to the Part B application. (letter attached).

Closure/Post Closure plan is attached.

The hazardous waste turn-in person will begin the identification and tracking process by noting the source of the waste and insuring that it is discharged into a proper and legal container that is labeled as to contents and dated once it is full; (Ref. a., c.). The unit or organization is responsible for procuring the necessary containers and packing materials. The hazardous waste turn-in person will contact the Fort Greely Environmental Coordinator to determine container and packaging requirements.

(3) The hazardous waste turn-in person will contact the Fort Greely Environmental Coordinator informing that the container is full and ready for removal from the unit or organization.

(4) The unit or organization will not move a container from their accumulation point on Fort Greely until the Environmental Coordinator inspects the container with the hazardous waste turn-in person and confirms the contents, labeling, and condition of the container suitable for subsequent turn-in. The unit or organization is responsible for the practical identification, dating of the container, and labeling necessary for future identification and tracking of the container contents and its source.

b. Directorate of Engineering and Housing (DEH) Environmental Coordinator:

(1) The Environmental Coordinator will inspect the container and confirm identification of the waste. This process will begin no more than 3 days after the hazardous waste turn-in person contacts the Environmental Coordinator informing that the container is full. The Environmental Coordinator will coordinate with DEH Roads and Grounds to move the container to Building S216 within 3 days after confirming the condition of the container and identification of the waste (Ref. c.). If the container or the identification of the contents is not suitable or accurate the Environmental Coordinator will reject the container, leave it in place, and reevaluate it once the hazardous waste turn-in person corrects the deficiencies. DEH will not take possession of the container until the deficiencies are corrected.

(2) The Environmental Coordinator will document all wastes delivered into the S216 yard. The waste identification, quantity, current location, date generated, and generator are noted in the Operating Record (CFR 265.73) maintained by the Environmental Coordinator. Identical information is entered into the Dbase III document register which facilitates tracking and is also maintained by the Environmental Coordinator.

(3) The Environmental Coordinator will coordinate with the servicing DRMO to determine and prepare the proper RCRA and shipping documentation necessary for turn-in of the material to the DRMO. The Coordinator will arrange final inspection of the material by DRMO and will arrange for legal shipment of the material to DRMO.

(4) The Environmental Coordinator will prepare and sign the 1348-1 turn-in document and have DEH RU Supply issue a document number for all the waste shipments to DRMO. The Environmental Coordinator will enter the

DIRECTORATE OF ENGINEERING & HOUSING
FORT GREELY, ALASKA

Tracking and Identification of Contents and Sources
of all Containers of all Waste Materials
Generated at Fort Greely

SOP #

28 August 1990

1. References:

a. Department of the Army, Headquarters, 6th Infantry Division (Light), Standard Operating Procedures (SOP) for Treatment, Storage and Disposal of Hazardous Materials and Hazardous Wastes; 1 April 1989.

b. Alaska Department of Environmental Conservation, Landfill Permit for Fort Greely;

c. Code of Federal Regulation (CFR 40), Protection of the Environment.

2. Purpose: To establish procedure for DEH to track containers and waste materials generated at Fort Greely.

3. These procedures are designed to allow DEH to identify and track all waste materials generated at Fort Greely. This includes identification and tracking of waste material generated by the tenant activities as well as 6th ID units and organizations. Also included is identification and tracking of abandoned waste materials which are found on Fort Greely by any activity.

4. Applicability: All activities that generate waste at Fort Greely and DEH personnel involved and responsible for collection, management, and disposal of waste materials.

5. Responsibilities:

a. Each unit or organization that generates any waste at Fort Greely:

(1) IAW Ref. a. Designate a "hazardous waste turn-in person" who will be the point of contact for the Fort Greely Environmental Coordinator. By law, this person will have annual hazardous material training and be DD-1348 certified. The unit commander or organization chief is responsible for complying with this requirement (Ref. a.).

(2) Include in the organization or unit internal Operating SOP procedures to distinguish and identify their routine wastes as hazardous materials/wastes or solid wastes that can be disposed of into the Fort Greely landfill, (Ref. a., b.).

22. A. Fort Richardson shall submit a written job description for every position related to hazardous waste management, and the job title and name of the employee filling each job.

RESPONSE:

This information is included under the response to paragraph 21. O.

21. Q. Fort Richardson shall continue the current assessment of the Eagle River Flats Area.

RESPONSE:

Fort Richardson is continuing the study of Eagle River Flats. Relevant findings are shared with the members of the Eagle River Flats Task Force, which includes the EPA and the DEC. The relevant findings of the study will be used to facilitate closure of the OB/OD area adjacent to it.

CLOSURE PLAN, POST CLOSURE PLAN AND FINANCIAL REQUIREMENTS

This plan is submitted in accordance with the requirements of 40 CFR 270.14 (b) (13), 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure Plan (40 CFR 270.14(b)(13))

This plan identifies the steps necessary to completely close the hazardous waste management units located on Fort Richardson at buildings 704, 45-125, the Auto Craft Shop, the former auto craft Shop, 35-752 and Circle Drive drum site.

Fort Richardson Environmental Office will maintain a copy of the approved closure plan and of all revisions to the plan. Revisions will be submitted to the EPA Regional Administrator and the Alaska Department of Environmental Conservation (ADEC) whenever any modifications are made to the existing equipment, structures, instruments, or procedures related to the management of the facility or when required by regulatory changes.

A. Closure Performance Standards (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls. It will minimize and eliminate threats to human health and the environment on completion of closure.

All wastes will be removed from the storage unit at closure and the unit will then be completely decontaminated, thus requiring no further maintenance. No escape of hazardous waste constituents should occur after closure, as all on-site hazardous waste will be removed from the facility at closure.

B. Partial Closure and Final Closure Activities (40 CFR 264.115)

Partial Closure is the closure of a unit/building.

Certification that final closure of the hazardous waste storage facility has been done in accordance with with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the EPA and the ADEC. Submittal of certification will be made within 60 days of final closure.

C. Maximum Waste Inventory (40 CFR 264.112(b)(3))

The following quantities are the maximum quantities of waste stored at each facility:

22.B. Fort Richardson shall submit, for EPA approval, the closure/post closure plans for building 704.

Response:

A draft closure plan is attached for all the sites identified in this compliance agreement, except the OB/OD area, which is addressed at 22.E.

(c) There is a reasonable likelihood that another person will recommence operation of the unit within the year, and

(d) Closure of the unit would be incompatible with continued operation of the site.

(2) Completion of Closure activities

(a) The need for more than 180 days to close the facility, or

(b) The facility has the capacity to store additional waste (as above).

b. The petition would also demonstrate that all steps to prevent threats to human health and the environment, to include compliance with all applicable permit requirements. have and will be taken.

c. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPARA and the ADEC, and shall be in compliance with state and federal regulations.

E. Inventory Disposal, Removal and Decontamination of Equipment (40 CFR 264.114)

Each unit can be closed seperately or simultaneously.

Upon formal notification to proceed with unit(s) closure, no additional hazardous property will be accepted at the storage unit(s). All hazardous waste/property remaining in inventory will be removed in accordance with Defense Reutilization and Marketing Office procedures. If this process cannot be accomplished within the allotted time for closure, the hazardous property will be transferred to a permitted TSD site on Fort Richardson. The unit(s) will be inspected for loose items, i.e. papers, pallets or empty containers after the final inventory of waste is removed. These items will be removed and properly disposed of.

Decontamination procedures, sampling and analytical testing will be conducted by trained personnel. The services of these personnel will be obtained at the time of closure notification through DA contractual procedures.

The contractor who does the sampling and analytical testing will be required to:

1. Have an established QA/QC program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods , EPA Office of Solid Waste, EPA Publication #SW-846 (as revised).

2. Use sampling methods in accordance with a site-specific work plan developed by the contractor, and approved by the

Building	Max (gallons)
704	15,000
45-125	20,000
Auto Craft Shop	600
Circle Drive Drum Site	2,000
Preventive Maint. O/W sep.	100
35-752	1,500

during the operational life of each facility.

D. Closure Time

1. Schedule for Closure (40 CFR 264.112(b)(6))

a. Building 45-125 is an integral part of the operation of Fort Richardson. It is not anticipated that closure will occur, however, a closure date of 2039 is estimated.

Notification of intent to close will be sent 60 days before beginning final closure of this unit to the EPARA and to the ADEC. Final closure will be supervised by an independent registered professional engineer.

Upon receipt of the final volume of hazardous waste, closure activities will be initiated. Table presents an estimated schedule for closure which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

b. The other sites, i.e., buildings 704, 35-752, the Auto Craft Shop, Circle Drive Drum site and the DEH Preventive Maintenance shop are unpermitted storage facilities, and as such, closure will begin upon approval of this plan.

2. Extensions for Closure Time (40 CFR 264.113(a) and (b))

a. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close a unit, then a petition will be sent to the EPARA and the ADEC. The petition would by definition demonstrate the following items:

(1) Removal of Hazardous Waste

(a) The need for more than 90 days to remove wastes received at the facility prior to commencement of closure activities, or

(b) The facility has the capacity to receive additional waste, and

G. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

H. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

I. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

J. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

K. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

A post-closure plan will not be needed because this site will be completely decontaminated before closure is certified. Contamination that can not be removed within the listed time frame will result in extension of the closure time, not in post-closure monitoring.

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

EPA and ADEC.

3. Decontaminate equipment between samples using an appropriate solvent, followed by 3 rinses with distilled water then air dried, or by an alternate approved method.

4. Use test methods listed in table 2. Reference provides estimated detection limits, and specifies the maximum sample holding times. For a wipe sample, a blank will be run on filter paper that was not wiped on a surface. The filter paper wipe samples will be extracted using a method from SW-846 or TCLP in appendix I of 40 CFR 268 before being analyzed.

Records searches will be conducted before the work plan is finalized to determine locations and types of spills which have occurred in the unit to be closed. Buildings will be inspected for cracks in the floor or signs of deterioration in the containment system. This record review and unit inspection will determine the need to modify sampling and test parameters.

FACILITY	PARAMETERS
(a) Building 704	Petroleum products Solvents (hallogenated, aromatic and aliphatic) PCBs Heavy Metals (paint related)
(b) Auto Craft Shop	Same as (a) above
(c) Circle Drive Site	Same as above and Pesticides/herbicides
(d) DEH Preventive Maintenance Shop	Same as (a) above
(e) 35-752	Same as (a) above
(f) 45-125	All TCLP parameters PCB Characteristic waste Parameters listed in (a)

Trained personnel wearing appropriate levels of protection will remove and clean up all visible signs of contamination. Sampling, to include swipe tests, soil borings and surface soil testing will then be conducted. Results will be used to establish the extent of the contamination and appropriate cleanup methods.

F. Closure of Containers (40 CFR 264.178)

All containers will be sealed and labeled prior to shipment in accordance with 40 CFR parts 261 and 262. Manifests for container removal will be maintained by the Fort Richardson Environmental Office.

22.D. Fort Richardson shall submit a drum management plan designed to track and identify the contents and source of all drums on the facility.

Response:

The draft drum management plan for Fort Greely is attached. If this plan is approved by EPA, it will be implemented, with appropriate changes, at all three installations.

22.C,F,G,H,I,J, and K
These paragraphs require sampling of drums located at 45-590, the Auto Craft Shop, Circle Drive Drum Storage Site, DEH Preventative Maintenance oil/water separator, 35-752 and building 704, and disposal of the waste located at the sites. Paragraph K provides for an extension to the time limits if requested.

Response: Samples were taken in October 1990, results have not yet been received. At this time, Fort Richardson requests a 60-day extension be granted for these tasks. Draft Closure/Post Closure Plans are included at response to Paragraph 22.B.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO ATTENTION OF:

APVR-DE-PSE (1-11) 25 FEB 1991

MEMORANDUM FOR Commander, U.S. Army Pacific, ATTN: APEN-R (COL Yanagihara), Fort Shafter, HI 96858-5100

SUBJECT: Report on Environmental Compliance

1. Reference memorandum, USARPAC, APEN-R, 5 Feb 91, SAB.

2. As requested in referenced memorandum, please find following matrix which answers Section 1b, Environmental Compliance Staff Projections:

	FRA	FWA	FGA
FY92	12	6	2
FY93	13	6	2
FY94	13	7	2
FY95	14	7	2
FY96	15	8	2
FY97	15	8	2

Please note: Does not include Natural Resources persons. Total: 4. Does not include Defense Environmental Resources Account funded persons. Total: 3

3. Sections 1a and 2 will be forwarded to you upon completion of the DD Form 1383 (Environmental Pollution, Prevention, Abatement and Control Report).

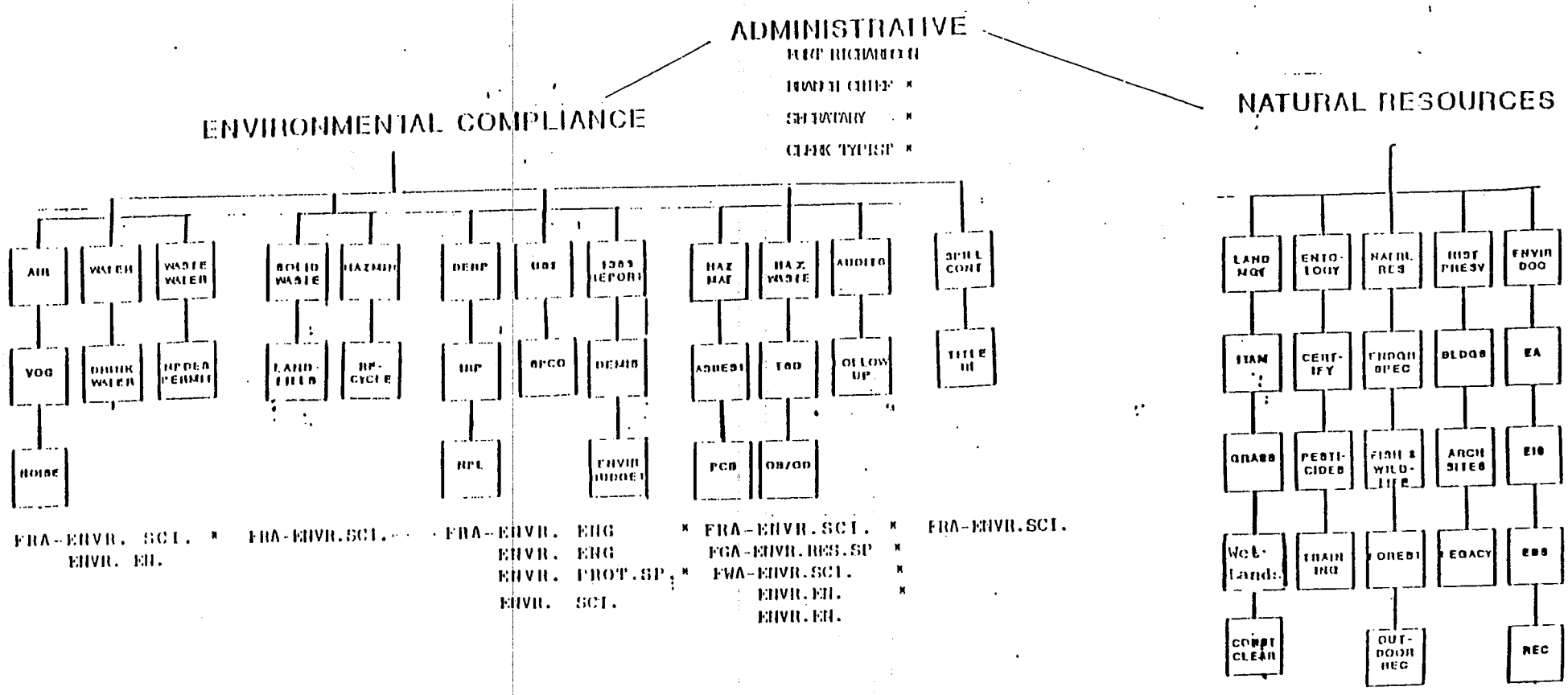
4. Point of contract for more information on this subject is John N. Wilson, Chief, Plans and Services Division, AV 317-863-0285, Ext 208, or Douglas W. Johnson, Chief, Environmental Resources Branch, AV 317-863-0285, Ext 115.

SIGNED

EDWIN R. RUFF
Colonel, EN
Director of Engineering and Housing
6th Inf Div (L) and USAG, AK

6th ID(L) & USAG(AK)

Environmental Resources Branch Organization



* Signifies Staffed Position

APVR-DE-PSE (200-1a) 1 MAR 1991

MEMORANDUM FOR RECORD

SUBJECT: Staffing Plan

1. References:

a. Organizational Chart. Environmental Resources Branch (enclosure 1).

b. Memorandum. DEH. APVR-DE-PSE. 25 Feb 91. subject: Report on Environmental Compliance (enclosure 2).

2. Current staffing plan requires twenty positions to meet challenges set down by current state and federal environmental compliance regulations and laws. Four full-time positions are utilized for natural resources issues. All positions are staffed. Three full-time positions are held for administrative duties are are also currently staffed. Seven positions are currently planned for hazardous waste minimization and disposal, solid waste management, and spill control. Currently only four positions are staffed with three additional positions advertised for availability. One staffed position currently manages water and air compliance programs. Lastly, four position are planned for restoration and cleanup projects. This includes underground and aboveground tank program and historical sites cleanup. Currently two position are staffed and two are being advertised.

3. Not included in these counts are two military positions currently used for hazardous waste accumulation point compliance and monitoring.

2 Encls

DOUGLAS W. COWISON
Chief, Environmental
Resources Branch

Factor 8. Physical Demands

21. Fort Richardson will submit an Environmental Staffing Plan which describes the number of personnel that will be dedicated to achieving compliance with EPA regulations.

Factor 9. Work Environment

RESPONSE:

Most of the work is performed in an office setting.

Attached is the proposed staffing for the Environmental offices at all three installations. The astesisk (*) indicates positions which are filled. The second attachment is a letter forwarded to USARPAC delineating the staffing needed for 6th Infantry Division (Light) to comply with Environmental Regulations.

Factor 8. Physical Demands. (Level 8-1 5 points)

Most of the work is sedentary although there is some walking and bending during on-site inspections of the Division facilities.

Factor 9. Work Environment. (Level 9-1 5 points)

Most of the work is performed in an office setting although there is occasional exposure to conditions wherein facilities are undergoing modifications, improvements, or alterations.

TOTAL POINTS 2790

consistent implementation and compliance. Judgment is also exercised in resolving varied problems for which technical guidelines are insufficient or not directly applicable due, for example, to unique arctic and subarctic environmental conditions.

Factor 4. Complexity. (Level 4-4 225 points)

Assignments involve the interpretation and implementation of policy and program directives that generally require supplementation to provide adequate coverage for a range of subjects involving public safety and welfare and the protection of natural resources that are found within the Division. Assignments typically involve several complex features where issues and factors to be considered involve major areas of uncertainty in approach and methodology or interpretation and evaluation processes resulting from such elements as continuing changes in programs, technological developments, unknown phenomena, conflicting requirements, or rapidly changing guidelines and standards emanating from Federal, state, and local regulatory agencies. Supervision of subordinates requires consideration of employees' capabilities in making selective work assignments; reviewing, accepting, or rejecting work projects; evaluating performance; and in making other personnel decisions.

Factor 5. Scope and Effect. (Level 5-4 225 points)

The purpose of the position is to provide expertise at the Division level for the design, improvement, maintenance, and operation of environmental engineering facilities and the administration of the energy conservation and related programs. Work efforts have a significant impact on environmental facilities and related programs within the Division.

The manner in which subordinates are supervised has a direct effect upon the morale and production of the office.

Factor 6. Personal Contacts. (Level 6-3 60 points)

Intra-agency contacts include other engineers, procurement personnel, officials and managers of the facilities, and subject-matter experts from FORSCOM and DA. Additional contacts include architect-engineer firms, construction contractors, fellow members of professional organizations, manufacturers, and engineers and officials within the immediate local community, the borough and state, and other Federal agencies having regulatory and enforcement authority concerning installation activities that affect on-post and nearby off-pose natural resources of water, land, and air.

Factor 7. Purpose of Contacts. (Level 7-3 120 points)

Contacts are to coordinate projects, discuss needs of user, discuss designs and specifications, and monitor contracts which often involve technical disagreements. Contacts are also to justify work proposals to FORSCOM and DA officials and to keep abreast of the state-of-the-art.

Factor 1. Knowledge Required by the Position. (Level 1-7 1250 points)

--Knowledge of professional environmental engineering concepts, principles, and practices applicable to the full range of duties concerned with the operation, maintenance and modification of sanitary facilities (e.g., domestic and industrial waste treatment systems and water distribution and storage systems) and the implementation and administration of the Division energy conservation and related programs.

--Knowledge and skill sufficient to adapt standard practices, equipment, or techniques in preparing scopes of work, specifications, and designs (or monitoring those prepared by others) for the improvement or alternation of existing or the eventual construction of new facilities to insure compliance with project guidelines.

--Familiarity with related engineering fields such as mechanical and electrical.

--Knowledge and skill to assess the impact of the Brigade's activities on public safety, ecology, and environment involving matters directly or closely related to public welfare, protection of natural resources, and energy conservation.

--A general knowledge of agency personnel rules, regulations, and procedures to assist in supervision of subordinates.

--Skill in the application of supervisory techniques used to make assignments, direct work and measure accomplishments of subordinate employees.

Factor 2. Supervisory Controls. (Level 2-4 450 points)

Supervisor makes initial assignments in the form of broad overall objectives and special assignments (as required) in the form of sensitive projects. Otherwise, assignments are either self-generated or received in accordance with established work-flow channels since the employee is the recognized Division authority in the field of environmental engineering. The employee carries out work independently, interpreting policy and regulations in consonance with established objectives, resolving most conflicts that arise, and coordinating work with others as required. Problems of unusual significance, however, are normally referred for the supervisor's views for development of a joint course of action. Work is normally accepted as technically accurate but may be subjected to review upon completion for achievement of objectives, conformance to policy; and compatibility with the work of other functional elements of the organization.

Factor 3. Guidelines. (Level 3-4 450 points)

Guidelines include standard material in the form of agency policies and regulations, textbooks, manufacturers' catalogs and handbooks, standard designs and specifications of the employee's agency and those of regulatory agencies, applicable codes, and established practices. Responsible for the development of instructions and explanatory material to implement policy and programs of higher authority. The employee exercises judgment in assuring proper, timely and

1. Reviews new or revised policy directives and program materials of higher authority or regulatory agencies; develops local plans, policies, and guidelines/instructions to insure uniform Division wide compliance concerning the above mentioned programs. Maintains effective technical liaison with other DEH divisions, federal, state and local agencies involved in activities related to compliance with regulations and laws pertaining to the above outlined programs. Provides technical guidance to branch foremen on special operating conditions related to the Environmental Resources elements of their responsibilities. Represents the Division at conferences and on committees comprised of representatives of other governments and commercial organizations.

(30%)

2. Exercises staff surveillance over the operation, maintenance, and administration of the Division environmental and natural resources programs by performing the preliminary planning as the chief environmental engineer to prepare or insure development of requirements, schematic plans, preliminary cost estimates, plans, specifications, and schedules. Reviews technical reports and other technical phases of projects at all Army facilities within Alaska which pertain to the above listed programs. Verifies that all phases of design and construction in program areas satisfy unique arctic and subarctic conditions.

(30%)

3. Develops and insures the conduct of training programs pertaining to the protection and preservation of the environmental quality for the Division.

(10%)

4. Supervises approximately eight subordinate employees. With technical guidance to staff at FWA and FGA. Conducts and directs conferences with subordinates and fellow Division Chiefs for the purpose of discussing plans, budgeting and personnel requirements, work priorities, etc. Reviews cost reports and operating data submitted by subordinates and assures that the information is correct. Plans work, sets priorities, and prepares schedules. Assigns work to subordinates based on priorities, selective consideration of the difficulty and the requirements of the assignments, and the capabilities of employees. Evaluates performance of employees; gives advice, counsel, or instruction to individual employees on both work and administrative matters. Interviews candidates and makes selections for positions; makes recommendations for appointment, promotion, or reassignment involving such positions. Hears and resolves complaints from employees; effects minor disciplinary measures such as warnings and reprimands; and recommends action in more serious cases. Identifies developmental and training needs of employees; provides or makes provision for such development and training. Solves problems related to work supervised; and explains and gains support of employees in cost reduction, safety, EEO, employee suggestions, and similar programs. Provides technical guidance and direction to Environmental and Natural Resources Personnel throughout the Division.

(30%)

Performs other duties as assigned.

Job Number 88-24-S

Environmental Programs: 65% of work time.
6th Infantry Division (Light)

Toxic and hazardous materials and waste management-permits, sampling, SPCC plans, underground tank management, hazardous waste management plan, SOP for generators, pesticide and herbicide management, used solvent elimination program. Education for generators.

Water/wastewater treatment - domestic and industrial treatment, NPSES permits, wetland permits, drinking water surveillance program, groundwater monitoring and modeling.

Air pollution abatement program - permits and standards.

Solid waste management - permits, compliance monitoring.

Noise program - ICUS program, noise contours and data.

NEPA program compliance - prepare environmental documents. Provide support for major off-post DOD wide training missions. Example: Brim Frost.

Archeology and historical preservation program - compliance and implement plan.

Asbestos management - laboratory identification of samples, develop and maintain database, SOP.

Installation Restoration Program - project identification, funding submittals, scope of work and specifications, interpretation of sampling results, contamination removal, documentation, corrective action.

Natural Resources Programs: 35% of work time

Grounds management - cantonment landscaping plan, turf development and maintenance, herbicide program, mechanical brush clearing program, erosion control, fertilizing schedule, supply schedule.

Fish and wildlife management - small and large game species, fish, waterfowl. Hunting and trapping, stocking, viewing, relocations, counting, human animal conflicts. Maintain appropriate habitat for a healthy and well-balanced wildlife population through the study of existing vegetation, acreage number of game species and propagation trends. Pesticide management.

Forestry management - firewood, sale, Christmas trees, clearing.

Outdoor Recreation - ORV plan, facilities, trails, signs.

Land Management - category of use, planning, forest fires, gravel extraction, encroachment monitoring. Provide coordination of multiple land use management for the 1,675,359 acre Division lands, including mountain, arctic and subarctic, forest and wetland areas.

DEPARTMENT OF THE ARMY
JOB DESCRIPTION
For use of this form, see CPR 501; the proponent agency is DCSPER.

1. JOB NUMBER: 88-24-S

2. INSTALLATION OR HEADQUARTERS OFFICE: 6th Infantry Division (Light)

3. ORGANIZATIONAL LOCATION (Complete on organization copy only): Environmental Resources Branch, Plans and Services Division DEH

4. CITATION TO APPLICABLE STANDARD AND THE DATE OF ISSUANCE: See Evaluation Statement

5. TITLE: Supervisory Environmental Engineer

6. PAY SCHEDULE: GS

7. OCC CODE: 819

8. GRADE: 12

9. FAIR LABOR STANDARDS ACT: ☒ EXEMPT ☐ NONEXEMPT

10. COMP LEVEL: GS 12-34

11. EVALUATION APPROVAL EFC:51

TITLE, PAY SCHEDULE, OCC CODE, AND GRADE OF THIS JOB HAVE BEEN FIXED IN ACCORDANCE WITH OFFICIAL POLICY AND GRADE LEVEL STANDARDS

Tony Whitehouse (Signature) 11/3/87 (Date)

12. JOB CONTENT APPROVAL (COMPLETE ON ORGANIZATION COPY ONLY)

a. I CERTIFY THAT THIS IS AN ACCURATE STATEMENT OF THE MAJOR DUTIES AND RESPONSIBILITIES OF THIS POSITION AND ITS ORGANIZATIONAL RELATIONSHIPS AND THAT THE POSITION IS NECESSARY TO CARRY OUT GOVERNMENT FUNCTIONS FOR WHICH I AM RESPONSIBLE. THIS CERTIFICATION IS MADE WITH THE KNOWLEDGE THAT THIS INFORMATION IS TO BE USED FOR STATUTORY PURPOSES RELATING TO APPOINTMENT AND PAYMENT OF PUBLIC FUNDS AND THAT FALSE OR MISLEADING STATEMENTS MAY CONSTITUTE VIOLATIONS OF SUCH STATUTES OR THEIR IMPLEMENTING REGULATIONS.

John Wilson (Signature of Approving Supervisor) 3 Nov 87 (Date)

b. THIS JOB DESCRIPTION WITH SUPPLEMENTAL MATERIAL IS ADEQUATE FOR PURPOSE OF EVALUATION.

Edward F Matthews (Signature of Position Classification Specialist) 3 November 1987 (Date)

13. STATEMENT OF DUTIES AND RESPONSIBILITIES

MAJOR DUTIES

Serves as Chief Environmental Engineer for the Division with responsibilities for the Environmental Engineering Section and the Natural Resources Section. Under the Environmental Section: technical assistance will be provided in pollution control, monitoring and surveillance. Insure compliance with local, state and federal environmental standards. Under the Natural Resources Section: technical assistance in the use and care for natural resources in the combination that best serves the present and future needs of the United states and its people. Included in management is landscape planting, forestry, fish and wildlife, turf and ground cover, land use and soil erosion. Maintains coordination with Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service.

Areas of responsibility include Fort Richardson, Wainwright, and Greely, and petroleum facilities in Haines, Fairbanks, Whittier and Anchorage and related pipeline facilities. Army properties of Seward, Nome and Bethel and off post exercises in areas throughout the State.

—Reviews military construction projects and provides comments as necessary to ensure that necessary provisions to meet applicable or potential environmental standards are included. Provides related engineering service for the design and construction of water and storm drain systems. (5%)

—Performs other job-related duties as assigned.

—Stays abreast of the latest developments [illegible] and regulations with emphasis on [illegible] asbestos, UST/LUST, HW/FW and recycling [illegible] directives or program materials of nearby [illegible] preparing plans for the Division [illegible] Environmental Resources Branch, incumbent may collect [illegible] which include [illegible] Environmental Resources staff on environmental regulations [illegible] operations including: (1) evaluation of impact on equipment and operations [illegible] preparation of inventories of pollution sources affected [illegible] for combustion facilities, change of solvents for surface treatment [illegible] dry cleaning facilities, improvements in the [illegible] involvement in [illegible] [illegible] (2) disposal of HW by generators [illegible] manage and dispose [illegible]

The policies and programs involved include such subjects as: industrial waste treatment and storage facilities; environmental documentation for projects and Army training, underground storage tanks (UST), hazardous material/hazardous waste (HM/HW) generator training and assistance; and control of pollution as may be produced by power plants or medical and classified incinerators on-post.

—Stays abreast of the latest developments and publications in environmental laws and regulations with emphasis on water and air pollution problems, solid waste, asbestos, UST/LUST, HM/HW, and recycling systems. Interprets new or revised policy directives or program materials of higher authority or regulatory agencies, preparing plans for use Division-wide. Under the direction of the Chief of the Environmental Resources Branch, incumbent may collect various types of samples which include water/wastewater, and HM/HW asbestos samples. Periodically advises Environmental Resources staff on environmental regulations having impact on operations including: (1) evaluation of impact on equipment and operations, (2) preparation of inventories of pollution sources affected, and (3) preparation and coordination of new pollution abatement projects required, e.g., change of fuels for combustion facilities, change of solvents for surface treatment operations or dry cleaning facilities, improvements in wastewater or water supply treatment, improvements of water conservation procedures and change of disposal or recycling procedures for solid waste, wastewater, and toxic or hazardous materials. Provides input on coordination and review of pollution abatement projects and environmental projects, including hazardous and toxic materials and water and wastewater pollution control. (30%)

—Under the direction of the Chief of the Environmental Resources Branch, incumbent may conduct environmental pollution control surveys of Division activities and operations to investigate: (1) Control of emission of pollutants to the atmosphere, solid waste disposal, recycling procedures, prevention and countermeasures for potential pollution sources, disposal of hazardous wastes. (2) Provides technical assistance and input to Division staff on: (1) matters concerning environmental compliance, (2) environmental matters associated with community relations, (3) containment and disposal of oil and HM/HW spills, (4) disposal of HM/HW generated at Fort Richardson, and (5) working ability to manage and prepare HM/HW budget. (30%)

—Incumbent may be required to inspect Division hazardous waste accumulation areas, underground storage tanks and related accoutrements, and nonhazardous and solid waste storage locations periodically, as required, or in response to requests to identify and resolve problems. Assists in reviewing/developing designs and/or specifications and preparing statement-of-work and fee estimates for eventual award of contract to architect-engineering firms. Reviews changes to plans, specifications, contracts, studies, surveys, and cost estimates of architect-engineer or other government agencies to ensure that proper environmental engineering features are provided and impacts to the environment are minimized. Incumbent may be required to write Environmental Impact Statements and conduct Environmental Assessments. Reviews proposals which have a direct or indirect effect on the Department of the Army's environmental goal and to minimize adverse effects on the quality of the human environment without impairing the Army's mission. (35%)

JOB DESCRIPTION

For use of this form, see CPR 501; the proponent agency is DCSPER.

2. INSTALLATION OR HEADQUARTERS OFFICE

PAY PLAN: GS SERIES:

3. ORGANIZATIONAL LOCATION *(Complete on organization copy only)*

4. CITATION TO APPLICABLE STANDARD AND THE DATE OF ISSUANCE

ACADEMIC FIELD

5. TITLE

6. PAY SCHEDULE | 7. OCC CODE | 8. GRADE

9. FAIR LABOR STANDARDS ACT ☐ EXEMPT ☐ NONEXEMPT

10. COMP LEVEL

11. EVALUATION APPROVAL

TITLE, PAY SCHEDULE, OCC CODE, AND GRADE OF THIS JOB HAVE BEEN FIXED IN ACCORDANCE WITH OFFICIAL POLICIES AND GRADE LEVEL STANDARDS

TITLE BASIC DATA TOTAL

(Signature) *(Date)*

12. JOB CONTENT APPROVAL *(COMPLETE ON ORGANIZATION COPY ONLY)*

a. I CERTIFY THAT THIS IS AN ACCURATE STATEMENT OF THE MAJOR DUTIES AND RESPONSIBILITIES OF THIS POSITION AND ITS ORGANIZATIONAL RELATIONSHIPS AND THAT THE POSITION IS NECESSARY TO CARRY OUT GOVERNMENT FUNCTIONS FOR WHICH I AM RESPONSIBLE. THIS CERTIFICATION IS MADE WITH THE KNOWLEDGE THAT THIS INFORMATION IS TO BE USED FOR STATUTORY PURPOSES RELATING TO APPOINTMENT AND PAYMENT OF PUBLIC FUNDS AND THAT FALSE OR MISLEADING STATEMENTS MAY CONSTITUTE VIOLATIONS OF SUCH STATUTES OR THEIR IMPLEMENTING REGULATIONS.

(Signature of Approving Supervisor) 7 JAN 90 *(Date)*

b. THIS JOB DESCRIPTION WITH SUPPLEMENTAL MATERIAL IS ADEQUATE FOR PURPOSE OF EVALUATION.

(Signature of Position Classification Specialist) *(Date)*

13. STATEMENT OF DUTIES AND RESPONSIBILITIES

SUPERVISORY CONTROLS

Works under the general supervision of the Chief, Environmental Resources Branch, who outlines the purpose and scope of work. The supervisor is available for advice and assistance on complex or controversial problems. Completed work is reviewed for adequacy and compliance with instructions.

MAJOR DUTIES

Serves as an Environmental Protection Specialist for the 6th Infantry Division (Light), with the responsibility for the implementation of environmental policies and programs at Forts Richardson, Wainwright, and Greely that embrace a wide range of subjects directly or indirectly concerned with the protection of public health and welfare, the environment, and associated natural resources. This position requires a working knowledge of state and federal environmental laws and regulations as well as DOD, DA and 6th Inf Div (L) environmental regulations and policies. The incumbent is responsible for the development and implementation of the Division policies for hazardous waste and hazardous material generation, storage, and disposal. These duties also include a working knowledge of other environmental programs which may impact on the incumbent's prime area of responsibility (i.e., solid waste, recycling, and PCBs).

NAME: SCOTT, CATHERINE A. SSN: 227-64-91

TITLE: ENV. RES. SPEC.

PAY PLAN: GS SERIES: 401 GRADE/STEP: 11/01 SALARY:

DATE LAST PROMOTION: 90/03/28 DATE LAST STEP INCREASE: NO

HIGHEST EDUCATION LEVEL: BACHELOR'S DEGREE

ACADEMIC FIELD: CHEMISTRY

SERVICE COMPUTATION DATE: 81/12/23

TRAINING HISTORY: (5 YEARS)

TITLE	START DATE	END DATE	TOTAL HO
Explosive Ordnance Disposal school			1664
Advanced Access and Disablement			40
Environmental Laws and Regulations	17 Jan 89	19 Jan 89	24
Microscopical Identification of Asbestos	23 Jan 89	27 Jan 89	40
Environmental Writing	9 May 89	11 May 89	24
Federal Facility Environmental Compliance and Cleanup	28 Nov 89	30 Nov 89	24
Environmental Requirments for Demilitarization	22 Jan 90	26 Jan 90	40
Environmental Compliance at Federal Facilities	6 Jun 90	7 Jun 90	16
Hazardous Waste Health and Safety	30 Jul 90	3 Aug 90	40
Hazardous Waste Supervisory Course	9 Feb	9 Feb	8

NAME: JOHNSON, DOUGLAS
TITLE: ENVIRONMENTAL SCIENT

SSN: [illegible]
TYPE: CAREER

PAY PLAN: GS SERIES: 1301 GRADE/STEP: 12/03 SALARY: $35,[illegible]

DATE LAST PROMOTION: 87/03/15 DATE LAST STEP INCREASE: 87/08/30

HIGHEST EDUCATION LEVEL: BACHELORS DEGREE YEAR: 1976
ACADEMIC FIELD: GEOLOGY/GOVERNMENT

SERVICE COMPUTATION DATE: 84/08/19

TRAINING HISTORY: (5 YEARS)

TITLE	START DATE	END DATE	TOTAL HOURS
RADIOACTIVITY AND THE ENVIRONMENT	86/01/21	86/05/13	48
LEGAL ASPECTS OF ENVIRONMENTAL PLANNING	87/01/19	87/05/20	48
BASIC PROJECT OFFICER COURSE		86/03/14	24
CONTRACT ADMINISTRATION COURSE		87/04/06	24
HAZARDOUS MATERIALS INCIDENT RESPONSE OPERATIONS COURSE	87/11/30	87/12/04	40
RESOURCE CONSERVATION RECOVERY ACT INSPECTORS WORKSHOP	88/06/20	88/06/24	40
ENVIRONMENTAL COMPLIANCE, ASSESSMENT AND MANAGEMENT PROGRAM	88/08/16	88/08/19	36
HAZARDOUS WASTE HEALTH AND SAFETY 8-HR REFRESHER	89/10/10		8
WORK ASSESSMENT MANAGEMENT TRAINING FOR RPM'S	89/11/14	89/11/15	16
BASIC INSPECTOR TRAINING	90/1/22	90/1/25	40
PCB INSPECTOR TRAINING	90/4/9	90/4/10	12
VISUAL EMISSIONS EVALUATION	90/09/24	90/09/25	24
HAZARDOUS WASTE HEALTH AND SAFETY REFRESHER	90/09/10	90/09/10	8

21. O. and 22. A. Fort Richardson shall provide annual training and annual review of initial training for personnel involved with hazardous waste management, maintain a written job description, job title and name of the employees filling each job related to hazardous waste.

RESPONSE:

Initial training for employees involved in hazardous waste management will, at a minimum, be in accordance with 29 CFR 1910.120. Additional training will be provided in other aspects of the job, e.g., sampling, Environmental laws and regulations, etc. Job descriptions and training records are attached for the employees presently involved in hazardous waste management.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT WAINWRIGHT, ALASKA

REPLY TO
ATTENTION OF:

AFVR-FW-DE

18 March 1988

MEMORANDUM FOR: Fort Wainwright's Marketers of Used Oil, ATTN: Fort Greely, Fort Richardson and DRMO

SUBJECT: Marketers Notification of Ft. Wainwright's Used Oil Management Activities

1. The 6th Infantry Division (L) notified the Environmental Protection Agency on 7 January, 1986 of its intention to burn used oil for energy recovery at Ft. Wainwright's Power Plant, which is classified as a Utility Boiler.

2. In order to abide with Federal Regulations, all marketers of used oil must establish an invoice system as described in 40 CFR 266.43. This system requires analysis to accompany every shipment of used oil.

3. Marketers are reminded that used oil which meets the definition of combustible liquid (flash point below 200°F, but greater than 100°F) are subject to DOT Hazardous Materials Regulations 49 CFR, 100-177.

DAVID A. DEAN
LTC, EN
ADEH, FWA

CF:
AFVR-FW-DC (LTC Miller)

21. N. Fort Richardson shall obtain notification from the burner of their off-specification used oil as required by 40 CFR 266.43(b)(5).

Response:

A copy of the notification is attached.

21. N. Fort Richardson shall obtain notification from the burner of their off-specification used oil as required by 40 CFR 266.43(b)(5).

Response:

A copy of the notification is attached.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT WAINWRIGHT, ALASKA

REPLY TO
ATTENTION OF:

AFVR-FW-DE

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DAVID A. DEAN
LTC, EN
ADEH, FWA

CF:
AFVR-FW-DO (LTC Miller)

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NAME: JOHNSON, DOUGLAS A. SSN: [illegible]
TITLE: ENVIRONMENTAL SCIENT TYPE: CAREER

PAY PLAN: GS SERIES: 1301 GRADE/STEP: 12/03 SALARY: $35,[illegible]

DATE LAST PROMOTION: 87/03/15 DATE LAST STEP INCREASE: 87/08/30

HIGHEST EDUCATION LEVEL: BACHELORS DEGREE YEAR: 1976
ACADEMIC FIELD: GEOLOGY/GOVERNMENT

SERVICE COMPUTATION DATE: 84/08/19

TRAINING HISTORY: (5 YEARS)

TITLE	START DATE	END DATE	TOTAL HOURS
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CONTRACT ADMINISTRATION COURSE		87/04/06	24
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ENVIRONMENTAL COMPLIANCE, ASSESSMENT AND MANAGEMENT PROGRAM	88/08/16	88/08/19	36
HAZARDOUS WASTE HEALTH AND SAFETY 8-HR REFRESHER	89/10/10		8
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HAZARDOUS WASTE HEALTH AND SAFETY REFRESHER	90/09/10	90/09/10	8

NAME: SCOTT, CATHERINE A. SSN: 227-64-91

TITLE: ENV. RES. SPEC.

PAY PLAN: GS SERIES: 401 GRADE/STEP: 11/01 SALARY:

DATE LAST PROMOTION: 90/03/28 DATE LAST STEP INCREASE: NO

HIGHEST EDUCATION LEVEL: BACHELOR'S DEGREE

ACADEMIC FIELD: CHEMISTRY

SERVICE COMPUTATION DATE: 81/12/23

TRAINING HISTORY: (5 YEARS)

TITLE	START DATE	END DATE	TOTAL HO
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Hazardous Waste Health and Safety	30 Jul 90	3 Aug 90	40
Hazardous Waste Supervising Course	9 Feb	9 Feb	8

DEPARTMENT OF THE ARMY
JOB DESCRIPTION
For use of this form, see CPR 501; the proponent agency is DCSPER.

1. JOB NUMBER

2. INSTALLATION OR HEADQUARTERS OFFICE

PAY PLAN: GS SERIES:

3. ORGANIZATIONAL LOCATION (Complete on organization copy only)

4. CITATION TO APPLICABLE STANDARD AND THE DATE OF ISSUANCE

ACADEMIC FIELD CHEMISTRY

5. TITLE

6. PAY SCHEDULE | 7. OCC CODE | 8. GRADE

9. FAIR LABOR STANDARDS ACT ☐ EXEMPT ☐ NONEXEMPT

10. COMP LEVEL

11. EVALUATION APPROVAL

TITLE, PAY SCHEDULE, OCC CODE, AND GRADE OF THIS JOB HAVE BEEN FIXED IN ACCORDANCE WITH OFFICIAL POLICIES AND GRADE LEVEL STANDARDS

(Signature) (Date)

12. JOB CONTENT APPROVAL (COMPLETE ON ORGANIZATION COPY ONLY)

a. I CERTIFY THAT THIS IS AN ACCURATE STATEMENT OF THE MAJOR DUTIES AND RESPONSIBILITIES OF THIS POSITION AND ITS ORGANIZATIONAL RELATIONSHIPS AND THAT THE POSITION IS NECESSARY TO CARRY OUT GOVERNMENT FUNCTIONS FOR WHICH I AM RESPONSIBLE. THIS CERTIFICATION IS MADE WITH THE KNOWLEDGE THAT THIS INFORMATION IS TO BE USED FOR STATUTORY PURPOSES RELATING TO APPOINTMENT AND PAYMENT OF PUBLIC FUNDS AND THAT FALSE OR MISLEADING STATEMENTS MAY CONSTITUTE VIOLATIONS OF SUCH STATUTES OR THEIR IMPLEMENTING REGULATIONS.

(Signature of Approving Supervisor) 7 JAN 90 (Date)

b. THIS JOB DESCRIPTION WITH SUPPLEMENTAL MATERIAL IS ADEQUATE FOR PURPOSE OF EVALUATION.

(Signature of Position Classification Specialist) (Date)

13. STATEMENT OF DUTIES AND RESPONSIBILITIES

SUPERVISORY CONTROLS

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MAJOR DUTIES

Serves as an Environmental Protection Specialist for the 6th Infantry Division (Light), with the responsibility for the implementation of environmental policies and programs at Forts Richardson, Wainwright, and Greely that embrace a wide range of subjects directly or indirectly concerned with the protection of public health and welfare, the environment, and associated natural resources. This position requires a working knowledge of state and federal environmental laws and regulations as well as DOD, DA and 6th Inf Div (L) environmental regulations and policies. The incumbent is responsible for the development and implementation of the Division policies for hazardous waste and hazardous material generation, storage, and disposal. These duties also include a working knowledge of other environmental programs which may impact on the incumbent's prime area of responsibility (i.e., solid waste, recycling, and PCBs).

DA FORM 1 JUN 76 374 PREVIOUS EDITIONS OF THIS FORM MAY BE USED. GPO : 1986 O - 162-761

The policies and programs involved include such subjects as: industrial waste treatment and storage facilities; environmental documentation for projects and Army training, underground storage tanks (UST), hazardous material/hazardous waste (HM/HW) generator training and assistance, and control of pollution as may be produced by power plants or medical and classified incinerators on-post.

—Stays abreast of the latest developments and publications in environmental laws and regulations with emphasis on water and air pollution problems, solid waste, asbestos, UST/LUST, HM/HW, and recycling systems. Interprets new or revised policy directives or program materials of higher authority or regulatory agencies, preparing plans for use Division-wide. Under the direction of the Chief of the Environmental Resources Branch, incumbent may collect various types of samples which include water/wastewater, and HM/HW asbestos samples. Periodically advises Environmental Resources staff on environmental regulations having impact on operations including: (1) evaluation of impact on equipment and operations, (2) preparation of inventories of pollution sources affected, and (3) preparation and coordination of new pollution abatement projects required, e.g., change of fuels for combustion facilities, change of solvents for surface treatment operations or dry cleaning facilities, improvements in wastewater or water supply treatment, improvements of water conservation procedures and change of disposal or recycling procedures for solid waste, wastewater, and toxic or hazardous materials. Provides input on coordination and review of pollution abatement projects and environmental projects, including hazardous and toxic materials and water and wastewater pollution control. (30%)

—Under the direction of the Chief of the Environmental Resources Branch, incumbent may conduct environmental pollution control surveys of Division activities and operations to investigate: (1) Control of emission of pollutants to the atmosphere, solid waste disposal, recycling procedures, prevention and countermeasures for potential pollution sources, disposal of hazardous wastes. (2) Provides technical assistance and input to Division staff on: (1) matters concerning environmental compliance, (2) environmental matters associated with community relations, (3) containment and disposal of oil and HM/HW spills, (4) disposal of HM/HW generated at Fort Richardson, and (5) working ability to manage and prepare HM/HW budget. (30%)

—Incumbent may be required to inspect Division hazardous waste accumulation areas, underground storage tanks and related accoutrements, and nonhazardous and solid waste storage locations periodically, as required, or in response to requests to identify and resolve problems. Assists in reviewing/developing designs and/or specifications and preparing statement-of-work and fee estimates for eventual award of contract to architect-engineering firms. Reviews changes to plans, specifications, contracts, studies, surveys, and cost estimates of architect-engineer or other government agencies to ensure that proper environmental engineering features are provided and impacts to the environment are minimized. Incumbent may be required to write Environmental Impact Statements and conduct Environmental Assessments. Reviews proposals which have a direct or indirect effect on the Department of the Army's environmental goal and to minimize adverse effects on the quality of the human environment without impairing the Army's mission. (35%)

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—Performs other job-related duties as assigned.

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—Under the direction of the Chief of the Environmental [illegible] operations of investigations [illegible] [illegible] (1) disposal of HW by generators [illegible] manage and prepare [illegible]

DEPARTMENT OF THE ARMY
JOB DESCRIPTION
For use of this form, see CPR 501: the proponent agency is DCSPER.

1. JOB NUMBER: 88-24-S

2. INSTALLATION OR HEADQUARTERS OFFICE: 6th Infantry Division (Light)

3. ORGANIZATIONAL LOCATION (Complete on organization copy only): Environmental Resources Branch, Plans and Services Division DEH

4. CITATION TO APPLICABLE STANDARD AND THE DATE OF ISSUANCE: See Evaluation Statement

5. TITLE: Supervisory Environmental Engineer

6. PAY SCHEDULE: GS

7. OCC CODE: 819

8. GRADE: 12

9. FAIR LABOR STANDARDS ACT: ☒ EXEMPT ☐ NONEXEMPT

10. COMP LEVEL: GS 12-34

11. EVALUATION APPROVAL EFC: 51

TITLE, PAY SCHEDULE, OCC CODE, AND GRADE OF THIS JOB HAVE BEEN FIXED IN ACCORDANCE WITH OFFICIAL POLICY AND GRADE LEVEL STANDARDS

Tony Whitehouse (Signature) 11/3/87 (Date)

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John Wilson (Signature of Approving Supervisor) 3 Nov 87 (Date)

b. THIS JOB DESCRIPTION WITH SUPPLEMENTAL MATERIAL IS ADEQUATE FOR PURPOSE OF EVALUATION.

Edward F Matthews (Signature of Position Classification Specialist) 3 November 1987 (Date)

13. STATEMENT OF DUTIES AND RESPONSIBILITIES

MAJOR DUTIES

Serves as Chief Environmental Engineer for the Division with responsibilities for the Environmental Engineering Section and the Natural Resources Section. Under the Environmental Section: technical assistance will be provided in pollution control, monitoring and surveillance. Insure compliance with local, state and federal environmental standards. Under the Natural Resources Section: technical assistance in the use and care for natural resources in the combination that best serves the present and future needs of the United states and its people. Included in management is landscape planting, forestry, fish and wildlife, turf and ground cover, land use and soil erosion. Maintains coordination with Alaska Department of Fish and Game and the U.S. Fish and Wildlife Service.

Areas of responsibility include Fort Richardson, Wainwright, and Greely, and petroleum facilities in Haines, Fairbanks, Whittier and Anchorage and related pipeline facilities. Army properties of Seward, Nome and Bethel and off post exercises in areas throughout the State.

Job Number 88-24-S

Environmental Programs: 65% of work time.
6th Infantry Division (Light)

Toxic and hazardous materials and waste management-permits, sampling, SPCC plans, underground tank management, hazardous waste management plan, SOP for generators, pesticide and herbicide management, used solvent elimination program. Education for generators.

Water/wastewater treatment - domestic and industrial treatment, NPSES permits, wetland permits, drinking water surveillance program, groundwater monitoring and modeling.

Air pollution abatement program - permits and standards.

Solid waste management - permits, compliance monitoring.

Noise program - ICUS program, noise contours and data.

NEPA program compliance - prepare environmental documents. Provide support for major off-post DOD wide training missions. Example: Brim Frost.

Archeology and historical preservation program - compliance and implement plan.

Asbestos management - laboratory identification of samples, develop and maintain database, SOP.

Installation Restoration Program - project identification, funding submittals, scope of work and specifications, interpretation of sampling results, contamination removal, documentation, corrective action.

Natural Resources Programs: 35% of work time

Grounds management - cantonment landscaping plan, turf development and maintenance, herbicide program, mechanical brush clearing program, erosion control, fertilizing schedule, supply schedule.

Fish and wildlife management - small and large game species, fish, waterfowl. Hunting and trapping, stocking, viewing, relocations, counting, human animal conflicts. Maintain appropriate habitat for a healthy and well-balanced wildlife population through the study of existing vegetation, acreage number of game species and propagation trends. Pesticide management.

Forestry management - firewood, sale, Christmas trees, clearing.

Outdoor Recreation - ORV plan, facilities, trails, signs.

Land Management - category of use, planning, forest fires, gravel extraction, encroachment monitoring. Provide coordination of multiple land use management for the 1,675,359 acre Division lands, including mountain, arctic and subarctic, forest and wetland areas.

1. Reviews new or revised policy directives and program materials of higher authority or regulatory agencies; develops local plans, policies, and guidelines/instructions to insure uniform Division wide compliance concerning the above mentioned programs. Maintains effective technical liaison with other DEH divisions, federal, state and local agencies involved in activities related to compliance with regulations and laws pertaining to the above outlined programs. Provides technical guidance to branch foremen on special operating conditions related to the Environmental Resources elements of their responsibilities. Represents the Division at conferences and on committees comprised of representatives of other governments and commercial organizations.

(30%)

2. Exercises staff surveillance over the operation, maintenance, and administration of the Division environmental and natural resources programs by performing the preliminary planning as the chief environmental engineer to prepare or insure development of requirements, schematic plans, preliminary cost estimates, plans, specifications, and schedules. Reviews technical reports and other technical phases of projects at all Army facilities within Alaska which pertain to the above listed programs. Verifies that all phases of design and construction in program areas satisfy unique arctic and subarctic conditions.

(30%)

3. Develops and insures the conduct of training programs pertaining to the protection and preservation of the environmental quality for the Division.

(10%)

4. Supervises approximately eight subordinate employees. With technical guidance to staff at FWA and FGA. Conducts and directs conferences with subordinates and fellow Division Chiefs for the purpose of discussing plans, budgeting and personnel requirements, work priorities, etc. Reviews cost reports and operating data submitted by subordinates and assures that the information is correct. Plans work, sets priorities, and prepares schedules. Assigns work to subordinates based on priorities, selective consideration of the difficulty and the requirements of the assignments, and the capabilities of employees. Evaluates performance of employees; gives advice, counsel, or instruction to individual employees on both work and administrative matters. Interviews candidates and makes selections for positions; makes recommendations for appointment, promotion, or reassignment involving such positions. Hears and resolves complaints from employees; effects minor disciplinary measures such as warnings and reprimands; and recommends action in more serious cases. Identifies developmental and training needs of employees; provides or makes provision for such development and training. Solves problems related to work supervised; and explains and gains support of employees in cost reduction, safety, EEO, employee suggestions, and similar programs. Provides technical guidance and direction to Environmental and Natural Resources Personnel throughout the Division.

(30%)

Performs other duties as assigned.

Factor 1. Knowledge Required by the Position. (Level 1-7 1250 points)

--Knowledge of professional environmental engineering concepts, principles, and practices applicable to the full range of duties concerned with the operation, maintenance and modification of sanitary facilities (e.g., domestic and industrial waste treatment systems and water distribution and storage systems) and the implementation and administration of the Division energy conservation and related programs.

--Knowledge and skill sufficient to adapt standard practices, equipment, or techniques in preparing scopes of work, specifications, and designs (or monitoring those prepared by others) for the improvement or alternation of existing or the eventual construction of new facilities to insure compliance with project guidelines.

--Familiarity with related engineering fields such as mechanical and electrical.

--Knowledge and skill to assess the impact of the Brigade's activities on public safety, ecology, and environment involving matters directly or closely related to public welfare, protection of natural resources, and energy conservation.

--A general knowledge of agency personnel rules, regulations, and procedures to assist in supervision of subordinates.

--Skill in the application of supervisory techniques used to make assignments, direct work and measure accomplishments of subordinate employees.

Factor 2. Supervisory Controls. (Level 2-4 450 points)

Supervisor makes initial assignments in the form of broad overall objectives and special assignments (as required) in the form of sensitive projects. Otherwise, assignments are either self-generated or received in accordance with established work-flow channels since the employee is the recognized Division authority in the field of environmental engineering. The employee carries out work independently, interpreting policy and regulations in consonance with established objectives, resolving most conflicts that arise, and coordinating work with others as required. Problems of unusual significance, however, are normally referred for the supervisor's views for development of a joint course of action. Work is normally accepted as technically accurate but may be subjected to review upon completion for achievement of objectives, conformance to policy; and compatibility with the work of other functional elements of the organization.

Factor 3. Guidelines. (Level 3-4 450 points)

Guidelines include standard material in the form of agency policies and regulations, textbooks, manufacturers' catalogs and handbooks, standard designs and specifications of the employee's agency and those of regulatory agencies, applicable codes, and established practices. Responsible for the development of instructions and explanatory material to implement policy and programs of higher authority. The employee exercises judgment in assuring proper, timely and

consistent implementation and compliance. Judgment is also exercised in resolving varied problems for which technical guidelines are insufficient or not directly applicable due, for example, to unique arctic and subarctic environmental conditions.

Factor 4. Complexity. (Level 4-4 225 points)

Assignments involve the interpretation and implementation of policy and program directives that generally require supplementation to provide adequate coverage for a range of subjects involving public safety and welfare and the protection of natural resources that are found within the Division. Assignments typically involve several complex features where issues and factors to be considered involve major areas of uncertainty in approach and methodology or interpretation and evaluation processes resulting from such elements as continuing changes in programs, technological developments, unknown phenomena, conflicting requirements, or rapidly changing guidelines and standards emanating from Federal, state, and local regulatory agencies. Supervision of subordinates requires consideration of employees' capabilities in making selective work assignments; reviewing, accepting, or rejecting work projects; evaluating performance; and in making other personnel decisions.

Factor 5. Scope and Effect. (Level 5-4 225 points)

The purpose of the position is to provide expertise at the Division level for the design, improvement, maintenance, and operation of environmental engineering facilities and the administration of the energy conservation and related programs. Work efforts have a significant impact on environmental facilities and related programs within the Division.

The manner in which subordinates are supervised has a direct effect upon the morale and production of the office.

Factor 6. Personal Contacts. (Level 6-3 60 points)

Intra-agency contacts include other engineers, procurement personnel, officials and managers of the facilities, and subject-matter experts from FORSCOM and DA. Additional contacts include architect-engineer firms, construction contractors, fellow members of professional organizations, manufacturers, and engineers and officials within the immediate local community, the borough and state, and other Federal agencies having regulatory and enforcement authority concerning installation activities that affect on-post and nearby off-pose natural resources of water, land, and air.

Factor 7. Purpose of Contacts. (Level 7-3 120 points)

Contacts are to coordinate projects, discuss needs of user, discuss designs and specifications, and monitor contracts which often involve technical disagreements. Contacts are also to justify work proposals to FORSCOM and DA officials and to keep abreast of the state-of-the-art.

Job Number 88-24-S

Factor 8. Physical Demands. (Level 8-1 5 points)

Most of the work is sedentary although there is some walking and bending during on-site inspections of the Division facilities.

Factor 9. Work Environment. (Level 9-1 5 points)

Most of the work is performed in an office setting although there is occasional exposure to conditions wherein facilities are undergoing modifications, improvements, or alterations.

TOTAL POINTS 2790

Factor 8. Physical Plant

21. Plas Fort Richardson will submit an Environmental Staffing Plan which describes the number of personnel that will be dedicated to achieving compliance with EPA regulations.

Factor 9. Work Facility

RESPONSE:

Most of the work is performed in an office [illegible]

Attached is the proposed staffing for the Environmental offices at all three installations. The astesisk (*) indicates positions which are filled. The second attachment is a letter forwarded to USARPAC delineating the staffing needed for 6th Infantry Division (Light) to comply with Environmental Regulations.

APVR-DE-PSE (200-1a) 1 MAR 1991

MEMORANDUM FOR RECORD

SUBJECT: Staffing Plan

1. References:

a. Organizational Chart, Environmental Resources Branch (enclosure 1).

b. Memorandum, DEH, APVR-DE-PSE, 25 Feb 91, subject: Report on Environmental Compliance (enclosure 2).

2. Current staffing plan requires twenty positions to meet challenges set down by current state and federal environmental compliance regulations and laws. Four full-time positions are utilized for natural resources issues. All positions are staffed. Three full-time positions are held for administrative duties are are also currently staffed. Seven positions are currently planned for hazardous waste minimization and disposal, solid waste management, and spill control. Currently only four positions are staffed with three additional positions advertised for availability. One staffed position currently manages water and air compliance programs. Lastly, four position are planned for restoration and cleanup projects. This includes underground and aboveground tank program and historical sites cleanup. Currently two position are staffed and two are being advertised.

3. Not included in these counts are two military positions currently used for hazardous waste accumulation point compliance and monitoring.

2 Encls

DOUGLAS W. COWISON
Chief, Environmental
Resources Branch

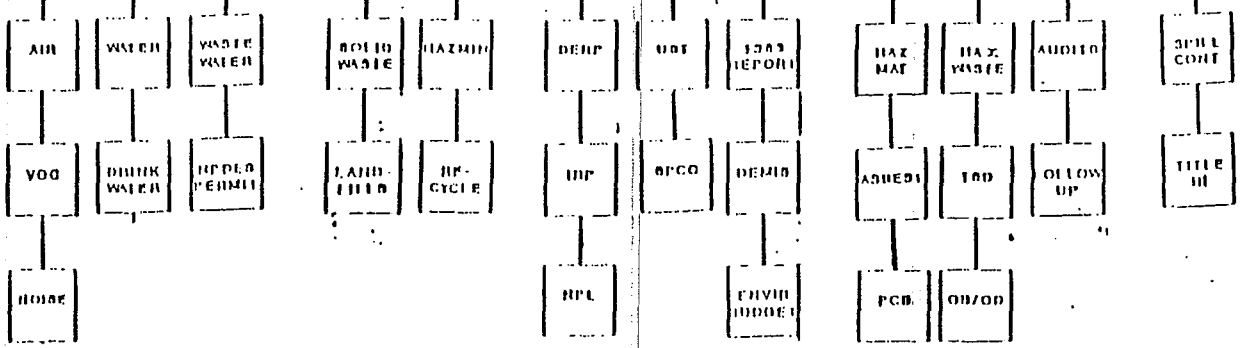
6th ID(L) & USAG(AK)

Environmental Resources Branch Organization

ADMINISTRATIVE

BRANCH CHIEF *
SECRETARY *
CLERK TYPIST *

ENVIRONMENTAL COMPLIANCE



FRA-ENVR. SCI. *
ENVR. EN.

FRA-ENVR.SCI.

FRA-ENVR. ENG *
ENVR. ENG
ENVR. PROT.SP *
ENVR. SCI.

FRA-ENVR.SCI. *
FGA-ENVR.RES.SP *
FWA-ENVR.SCI. *
ENVR.EN. *
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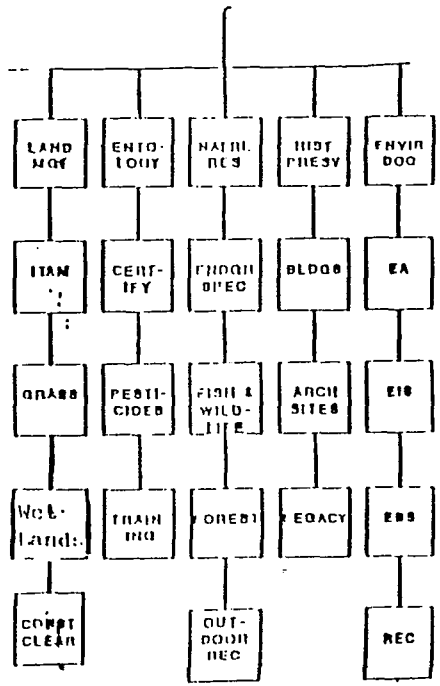
FRA-ENVR.SCI.

NATURAL RESOURCES



FRA-NAT. RES. SPEC. *
WILDLIFE BIO. *
FGA-WILDLIFE BIO *
FWA-NAT. RES. SPEC. *

* Signifies Staffed Position

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO ATTENTION OF:

APVR-DE-PSE (1-11) 25 FEB 1991

MEMORANDUM FOR Commander, U.S. Army Pacific, ATTN: APEN-R (COL Yanagihara), Fort Shafter, HI 96858-5100

SUBJECT: Report on Environmental Compliance

1. Reference memorandum, USARPAC, APEN-R, 5 Feb 91, SAB.

2. As requested in referenced memorandum, please find following matrix which answers Section 1b, Environmental Compliance Staff Projections:

	FRA	FWA	FGA
FY92	12	6	2
FY93	13	6	2
FY94	13	7	2
FY95	14	7	2
FY96	15	8	2
FY97	15	8	2

Please note: Does not include Natural Resources persons. Total: 4. Does not include Defense Environmental Resources Account funded persons. Total: 3

3. Sections 1a and 2 will be forwarded to you upon completion of the DD Form 1383 (Environmental Pollution, Prevention, Abatement and Control Report).

4. Point of contact for more information on this subject is John N. Wilson, Chief, Plans and Services Division, AV 317-863-0285, Ext 208, or Douglas W. Johnson, Chief, Environmental Resources Branch, AV 317-863-0285, Ext 118.

SIGNED

EDWIN R. RUFF
Colonel, EN
Director of Engineering and Housing
6th Inf Div (L) and USAG, AK

21. Q. Fort Richardson shall continue the current assessment of the Eagle River Flats Area.

RESPONSE:

Fort Richardson is continuing the study of Eagle River Flats. Relevant findings are shared with the members of the Eagle River Flats Task Force, which includes the EPA and the DEC. The relevant findings of the study will be used to facilitate closure of the OB/OD area adjacent to it.

22. A. Fort Richardson shall submit a written job description for every position related to hazardous waste management, and the job title and name of the employee filling each job.

RESPONSE:

This information is included under the response to paragraph 21. O.

CLOSURE PLAN, POST CLOSURE PLAN AND FINANCIAL REQUIREMENTS

This plan is submitted in accordance with the requirements of 40 CFR 270.14 (b) (13), 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure Plan (40 CFR 270.14(b)(13))

This plan identifies the steps necessary to completely close the hazardous waste management units located on Fort Richardson at buildings 704, 45-125, the Auto Craft Shop, the former auto craft Shop, 35-752 and Circle Drive drum site.

Fort Richardson Environmental Office will maintain a copy of the approved closure plan and of all revisions to the plan. Revisions will be submitted to the EPA Regional Administrator and the Alaska Department of Environmental Conservation (ADEC) whenever any modifications are made to the existing equipment, structures, instruments, or procedures related to the management of the facility or when required by regulatory changes.

A. Closure Performance Standards (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls. It will minimize and eliminate threats to human health and the environment on completion of closure.

All wastes will be removed from the storage unit at closure and the unit will then be completely decontaminated, thus requiring no further maintenance. No escape of hazardous waste constituents should occur after closure, as all on-site hazardous waste will be removed from the facility at closure.

B. Partial Closure and Final Closure Activities (40 CFR 264.115)

Partial Closure is the closure of a unit/building.

Certification that final closure of the hazardous waste storage facility has been done in accordance with with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the EPA and the ADEC. Submittal of certification will be made within 60 days of final closure.

C. Maximum Waste Inventory (40 CFR 264.112(b)(3))

The following quantities are the maximum quantities of waste stored at each facility:

22.B. Fort Richardson shall submit, for EPA approval, the closure/post closure plans for building 704.

Response:

A draft closure plan is attached for all the sites identified in this compliance agreement, except the OB/OD area, which is addressed at 22.E.

EPA and ADEC.

3. Decontaminate equipment between samples using an appropriate solvent, followed by 3 rinses with distilled water then air dried, or by an alternate approved method.

4. Use test methods listed in table 2. Reference provides estimated detection limits, and specifies the maximum sample holding times. For a wipe sample, a blank will be run on filter paper that was not wiped on a surface. The filter paper wipe samples will be extracted using a method from SW-846 or TCLP in appendix I of 40 CFR 268 before being analyzed.

Records searches will be conducted before the work plan is finalized to determine locations and types of spills which have occurred in the unit to be closed. Buildings will be inspected for cracks in the floor or signs of deterioration in the containment system. This record review and unit inspection will determine the need to modify sampling and test parameters.

FACILITY	PARAMETERS
(a) Building 704	Petroleum products Solvents (hallogenated, aromatic and aliphatic) PCBs Heavy Metals (paint related)
(b) Auto Craft Shop	Same as (a) above
(c) Circle Drive Site	Same as above and Pesticides/herbicides
(d) DEH Preventive Maintenance Shop	Same as (a) above
(e) 35-752	Same as (a) above
(f) 45-125	All TCLP parameters PCB Characteristic waste Parameters listed in (a)

Trained personnel wearing appropriate levels of protection will remove and clean up all visible signs of contamination. Sampling, to include swipe tests, soil borings and surface soil testing will then be conducted. Results will be used to establish the extent of the contamination and appropriate cleanup methods.

F. Closure of Containers (40 CFR 264.173)

All containers will be sealed and labeled prior to shipment in accordance with 40 CFR parts 261 and 262. Manifests for container removal will be maintained by the Fort Richardson Environmental Office.

G. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

H. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

I. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

J. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

K. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

A post-closure plan will not be needed because this site will be completely decontaminated before closure is certified. Contamination that can not be removed within the listed time frame will result in extension of the closure time, not in post-closure monitoring.

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

(c) There is a reasonable likelihood that another person will recommence operation of the unit within the year, and

(d) Closure of the unit would be incompatible with continued operation of the site.

(2) Completion of Closure activities

(a) The need for more than 180 days to close the facility, or

(b) The facility has the capacity to store additional waste (as above).

b. The petition would also demonstrate that all steps to prevent threats to human health and the environment, to include compliance with all applicable permit requirements. have and will be taken.

c. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPARA and the ADEC, and shall be in compliance with state and federal regulations.

E. Inventory Disposal, Removal and Decontamination of Equipment (40 CFR 264.114)

Each unit can be closed seperately or simultaneously.

Upon formal notification to proceed with unit(s) closure, no additional hazardous property will be accepted at the storage unit(s). All hazardous waste/property remaining in inventory will be removed in accordance with Defense Reutilization and Marketing Office procedures. If this process cannot be accomplished within the allotted time for closure, the hazardous property will be transferred to a permitted TSD site on Fort Richardson. The unit(s) will be inspected for loose items, i.e. papers, pallets or empty containers after the final inventory of waste is removed. These items will be removed and properly disposed of.

Decontamination procedures, sampling and analytical testing will be conducted by trained personnel. The services of these personnel will be obtained at the time of closure notification through DA contractual procedures.

The contractor who does the sampling and analytical testing will be required to:

1. Have an established QA/QC program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods , EPA Office of Solid Waste, EPA Publication #SW-846 (as revised).

2. Use sampling methods in accordance with a site-specific work plan developed by the contractor, and approved by the

Building	Max (gallons)
704	15,000
45-125	20,000
Auto Craft Shop	600
Circle Drive Drum Site	2,000
Preventive Maint. O/W sep.	100
35-752	1,500

during the operational life of each facility.

D. Closure Time

1. Schedule for Closure (40 CFR 264.112(b)(6))

a. Building 45-125 is an integral part of the operation of Fort Richardson. It is not anticipated that closure will occur, however, a closure date of 2039 is estimated.

Notification of intent to close will be sent 60 days before beginning final closure of this unit to the EPARA and to the ADEC. Final closure will be supervised by an independent registered professional engineer.

Upon receipt of the final volume of hazardous waste, closure activities will be initiated. Table presents an estimated schedule for closure which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

b. The other sites, i.e., buildings 704, 35-752, the Auto Craft Shop, Circle Drive Drum site and the DEH Preventive Maintenance shop are unpermitted storage facilities, and as such, closure will begin upon approval of this plan.

2. Extensions for Closure Time (40 CFR 264.113(a) and (b))

a. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close a unit, then a petition will be sent to the EPARA and the ADEC. The petition would by definition demonstrate the following items:

(1) Removal of Hazardous Waste

(a) The need for more than 90 days to remove wastes received at the facility prior to commencement of closure activities, or

(b) The facility has the capacity to receive additional waste, and

22.D. Fort Richardson shall submit a drum management plan designed to track and identify the contents and source of all drums on the facility.

Response:

The draft drum management plan for Fort Greely is attached. If this plan is approved by EPA, it will be implemented, with appropriate changes, at all three installations.

22.C,F,G,H,I,J, and K
These paragraphs require sampling of drums located at 45-590, the Auto Craft Shop, Circle Drive Drum Storage Site, DEH Preventative Maintenance oil/water separator, 35-752 and building 704, and disposal of the waste located at the sites. Paragraph K provides for an extension to the time limits if requested.

Response: Samples were taken in October 1990, results have not yet been received. At this time, Fort Richardson requests a 60-day extension be granted for these tasks. Draft Closure/Post Closure Plans are included at response to Paragraph 22.B.

The hazardous waste turn-in person will begin the identification and tracking process by noting the source of the waste and insuring that it is discharged into a proper and legal container that is labeled as to contents and dated once it is full (Ref. a., c.). The unit or organization is responsible for procuring the necessary containers and packing materials. The hazardous waste turn-in person will contact the Fort Greely Environmental Coordinator to determine container and packaging requirements.

(3) The hazardous waste turn-in person will contact the Fort Greely Environmental Coordinator informing that the container is full and ready for removal from the unit or organization.

(4) The unit or organization will not move a container from their accumulation point on Fort Greely until the Environmental Coordinator inspects the container with the hazardous waste turn-in person and confirms the contents, labeling, and condition of the container suitable for subsequent turn-in. The unit or organization is responsible for the practical identification, dating of the container, and labeling necessary for future identification and tracking of the container contents and its source.

b. Directorate of Engineering and Housing (DEH) Environmental Coordinator:

(1) The Environmental Coordinator will inspect the container and confirm identification of the waste. This process will begin no more than 3 days after the hazardous waste turn-in person contacts the Environmental Coordinator informing that the container is full. The Environmental Coordinator will coordinate with DEH Roads and Grounds to move the container to Building S216 within 3 days after confirming the condition of the container and identification of the waste (Ref. c.). If the container or the identification of the contents is not suitable or accurate the Environmental Coordinator will reject the container, leave it in place, and reevaluate it once the hazardous waste turn-in person corrects the deficiencies. DEH will not take possession of the container until the deficiencies are corrected.

(2) The Environmental Coordinator will document all wastes delivered into the S216 yard. The waste identification, quantity, current location, date generated, and generator are noted in the Operating Record (CFR 265.73) maintained by the Environmental Coordinator. Identical information is entered into the Dbase III document register which facilitates tracking and is also maintained by the Environmental Coordinator.

(3) The Environmental Coordinator will coordinate with the servicing DRMO to determine and prepare the proper RCRA and shipping documentation necessary for turn-in of the material to the DRMO. The Coordinator will arrange final inspection of the material by DRMO and will arrange for legal shipment of the material to DRMO.

(4) The Environmental Coordinator will prepare and sign the 1348-1 turn-in document and have DEH RU Supply issue a document number for all the waste shipments to DRMO. The Environmental Coordinator will enter the

DIRECTORATE OF ENGINEERING & HOUSING
FORT GREELY, ALASKA

Tracking and Identification of Contents and Sources
of all Containers of all Waste Materials
Generated at Fort Greely

SOP #

28 August 1990

1. References:

a. Department of the Army, Headquarters, 6th Infantry Division (Light), Standard Operating Procedures (SOP) for Treatment, Storage and Disposal of Hazardous Materials and Hazardous Wastes; 1 April 1989.

b. Alaska Department of Environmental Conservation, Landfill Permit for Fort Greely;

c. Code of Federal Regulation (CFR 40), Protection of the Environment.

2. Purpose: To establish procedure for DEH to track containers and waste materials generated at Fort Greely.

3. These procedures are designed to allow DEH to identify and track all waste materials generated at Fort Greely. This includes identification and tracking of waste material generated by the tenant activities as well as 6th ID units and organizations. Also included is identification and tracking of abandoned waste materials which are found on Fort Greely by any activity.

4. Applicability: All activities that generate waste at Fort Greely and DEH personnel involved and responsible for collection, management, and disposal of waste materials.

5. Responsibilities:

a. Each unit or organization that generates any waste at Fort Greely:

(1) IAW Ref. a. Designate a "hazardous waste turn-in person" who will be the point of contact for the Fort Greely Environmental Coordinator. By law, this person will have annual hazardous material training and be DD-1348 certified. The unit commander or organization chief is responsible for complying with this requirement (Ref. a.).

(2) Include in the organization or unit internal Operating SOP procedures to distinguish and identify their routine wastes as hazardous materials/wastes or solid wastes that can be disposed of into the Fort Greely landfill, (Ref. a., b.).

of this plan. The closure will have to be coordinated with the Eagle River Flats study, due to the close proximity of the OB/OD area to the Flats.

Notification of intent to close will be sent 60 days before beginning final closure of the site to the Regional Administrator of the EPA and the the ADEC. Final closure will be supervised and certified by an independent registered professional engineer.

Table 1 presents an estimated closure schedule which gives an estimate of the total time required to close the facility and the time required for intervening closure activities.

(2) Extensions for Closure Time (40 CFR 264.113 (a) and (b))

A. No extension for closure time is anticipated. If, however, an extension would be necessary to properly close the OB/OD site, or, if it becomes inappropriate to complete closure in that time frame, then a petition would be sent at least 30 days prior to the effected closure period(s). The petition will be sent to the Regional Administrator of the EPA and to the ADEC Central Office. The petition would by definition demonstrate the need for more than 180 days to complete removal of all residual contamination.

B. The petition would also demonstrate that all steps to prevent threats to human health and the environment, including compliance with all applicable permit requirements, have and will be taken.

e. Any requests for a change in operating plans, facility design or the approved closure plan will be submitted in writing to the EPA Regional Administrator and the ADEC Central Office, and shall be in compliance with state and Federal Regulations.

TABLE 1

ESTIMATED CLOSURE SCHEDULE FOR OB/OD SITE

ACTIVITY	DAYS
1. Closure plan implemented	0
2. Conduct range clearance	1-7
3. Cap as a landfill.	7-90
4. Dig monitoring wells	90-180
5. Completion of Closure and certification submittal	180

document number and manifest number into the Operating Record and the Dbase III document register. The document number will be placed on the respective containers to be shipped. [illegible]

(5) The Environmental Coordinator will maintain files of the 1348-1 receipt documents and the receipt manifests in the Operating Record when a material has been manifested. The Environmental Coordinator will insure that a copy of the 1348-1s for Manifested Hazardous Waste are forwarded to 6 ID Finance.

(3) The hazardous [illegible] person will contact the Form Green Environmental Coordinator [illegible] for removal from the unit or organization.

(4) The unit or organization will not [illegible] the accumulation point or [illegible] until the Environmental Coordinator [illegible] person and confirms the container labeling and condition of the container suitable for subsequent [illegible]. The unit or [illegible] the accumulation [illegible] the container and labeling necessary for safe [illegible]

[illegible]

[illegible]

22. E. Fort Richardson shall cease all OB/OD activities until permitted for such. Fort Richardson shall formally withdraw the Part B, Subpart X application and submit a closure/post closure plan.

RESPONSE:

Fort Richardson has withdrawn Subpart X to the Part B application. (letter attached).

Closure/Post Closure plan is attached.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

March 1, 1991

Directorate of Engineering and Housing

Mr. Charles Findley
Hazardous Waste Division
U.S. Environmental Protection Agency
Region X
1200 Sixth Avenue
Seattle, Washington 98101

Dear Mr. Findley:

At this time, Fort Richardson formally requests withdrawal of Subpart X of the Fort Richardson Part B Permit application. Open burn/open detonation operations will not be conducted at Fort Richardson.

Fort Greely requests withdrawal of the Part B Permit application filed previously. This includes a cessation of all open burn/open detonation operations. Fort Greely is considered a small quantity generator.

A copy of this letter is being sent to Mr. Dave Tetta, (HW-122), U.S. Environmental Protection Agency, Seattle, Washington; Mr. Kurt Eilo, U.S. Environmental Protection Agency, Anchorage, Alaska; and Mr. Jeff Mach, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you require additional information, please contact Catherine Scott, Environmental Scientist, Environmental Resources Branch, 863-3295, extension 132.

Sincerely,

John T Toews

for David R. Ruff
Colonel, U.S. Army
Director of Engineering and Housing
6th Infantry Division (Light)
and U.S. Army Garrison, Alaska

CLOSURE PLAN, POST-CLOSURE PLAN
AND FINANCIAL REQUIREMENTS

This section is submitted in accordance with the requirements of 40 CFR 270.14(b)(13). 270.14(b)(15-18), 264.110-264.115 and 264.178.

1. Closure plan (40 CFR 270.14(b)(13)

This plan identifies all steps that will be necessary to completely close the Fort Richardson open burn/open detonation (OB/OD) site.

The Fort Richardson Environmental Office will maintain a copy of the approved closure plan, and of all revisions to the plan. Revisions will be submitted for approval to the EPA Regional Administrator and the Alaska Department of Environmental Conservation whenever any modifications are made to the existing equipment, structure, instruments or procedures related to the management of the facility or when required by regulatory changes.

a. Closure Performance Standard (40 CFR 264.111)

This closure plan is designed to ensure that the facility will not require further maintenance and controls after closure. It will minimize threats to human health and the environment upon completion of closure.

All surface explosive material will be removed from the site at closure and the site will then be capped. Escape of hazardous waste or hazardous waste constituents will be monitored through use of monitoring wells. Leachate will be dealt with if it occurs.

b. Partial Closure and final closure Activities (40 CFR 264.115)

(1) There is no partial closure for this site.

(2) Certification that final closure of the hazardous waste treatment facility has been accomplished in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as by an independent registered professional engineer. The Engineer will also be on hand during closure to ensure that this closure plan is followed. Certification of closure will be submitted to the Regional Administrator of the EPA and the Alaska Department of Environmental Conservation (ADEC). Submittal of certification will be made within 60 days of final closure.

c. Maximum Waste Inventory (40 CFR 264.112(b)(3))

At a maximum, 6000 pounds of hazardous waste were treated at this facility in one day. The facility was used 12- 18 times per year. Burn and detonation residue were left at the facility after each use. The facility was cleared of visible surface contamination annually.

d. Closure Time

(1) Schedule for Closure (40 CFR 264.112(b)(6))
Fort Richardson anticipates closure of this site upon approval

f. Closure Procedures

1. No additional ordnance will be accepted for treatment. The site will have all surface debris removed using EOD range clearance protocols. All unexploded ordnance will be blown in place.

2. Sampling of the wells will be conducted by trained personnel. The services of those personnel will be obtained at the time of closure notification through DOD contractual procedures.

3. The contractor who does the sampling and analytical testing will be required to:

a. Have an established quality assurance/ quality control program that is consistent with the requirements of the EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods. (EPA Office of Solid Waste, EPA Publication #SW-846), and;

b. Provide the State and EPA with sampling and test protocols for approval before any work is accomplished.

4. Water sample test parameters are described in Table 2.

g. Closure of Tanks (40 CFR 264.197)

There will be no tanks used or present at this facility.

h. Closure of waste piles (40 CFR 270.18 (i) and 264.258)

No waste piles will be located at this facility.

i. Closure of Incinerators (40 CFR 264.351)

No incinerators will be located at this facility.

j. Closure of Landfills (40 CFR 270.21(e) and 264.310(a))

No landfills will be located at this facility.

k. Certification of Closure (40 CFR 264.115)

Certification that final closure of the hazardous waste storage facility was done in accordance with the approved closure plan will be made by the owner and operator of the facility, as well as an independent, registered professional engineer. Certification of closure will be submitted to the EPA Regional Administrator and the ADEC within 60 days of final closure.

2. Post-Closure Plan (40 CFR 270.14(b)(13), 264.117 and 264.118)

Monitoring of the wells will continue semi-annually for as long as the Army maintains Fort Richardson and for 30 years thereafter

3. Notice to Local Land Authority and Notice in Deed to Property (40 CFR 264.119 and 264.120)

The site was a hazardous waste storage facility, not a disposal facility. Therefore, notice to the local land authority in not necessary. A notation is not necessary in the deed to inform potential purchasers of restrictions associated with a disposal site, as required by the regulations cited by this section.

4. Closure Cost Estimate (40 CFR 270.14(b)(15) and 264.142(a) and (b))

The Federal Government is exempt from the financial requirements of hazardous waste regulation. The site is owned and operated by the Federal Government. Therefore, closure costs and insurance documentation are not required. The following sections do not apply to this facility: Financial Assurance Mechanism for Closure (40 CFR 264.143 and 264.150); Post-Closure Estimate (40 CFR 264.144); Financial Assurance Mechanism for Post-Closure (40 CFR 264.145); Liability Insurance (40 CFR 264.147); and, State Assumption of Responsibility (40 CFR 264.150).

Table 2

Metals	Explosives and Explosive Residues
Antimony	Nitrobenzene
Beryllium	1,3 Dinitrobenzene
Cadmium	1,3,5 Trinitrobenzene
Copper	2,4 Dinitrotoluene
Lead	2,6 Dinitrotoluene
Nickel	2,4,6 Trinitrotoluene
Silver	RDX
Thallium	Tetryl
Zinc	
Mercury	**Other**
Arsenic	
Selenium	Cyanides
	Nitrates
Mustard related compounds	
Thiodiglycol	
Organosulfur	
p-chlorophenylmethyl sulfone	
p-chlorophenylmethyl sulfoxide	
***Lewisite related compounds**	
Arsenic	
***Sarin (GB) related compounds**	triple based propellant

22. L. Fort Richardson shall submit a Waste Analysis Plan.

RESPONSE:

The Waste Analysis plan is intended to be part of the Part B application submittal. A copy of it is attached.

USED OIL FACILITY
APVR-DE-PSE 863-3295
Fort Richardson, AK 99505

DRMO Anchorage EAFB
SZ 362 D 552-4950

CLIN 4742 Price 3.42

BLDG: 955

55 55 37 94 ea.

85 GAL DRUMS
85 GAL OVERPACKS

OILY SLUDGE WITH WATER FROM OIL WATER SEPARATION

3303

85 GAL 2004 lbs

13

9305

THREE (3)

The above named material is properly classified, described, packaged, marked, and labeled, and is in proper condition for transportation according to DOT Regulations 49 CFR 100-185, IATA and IMO Regulations 49 CFR 170-189.

Signed

DD FORM 1348-1 (6 PT) 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

XRI D PQ 22 2 A HX

IDENT.	FROM	FSC	NIIN	QUANTITY	REQUISITIONER	DATE	SERIAL	ADDRESS	FUNDS DISTRIBUTION	REQD DELIV DATE	ANSWER	DOLLARS
		9150	SLUDGE	01 20								

USED OIL FACILITY
APVR-DE-PSE 863-3295
Fort Richardson, AK 99505

DRMO Anchorage EAFB
SE 362 D 552-4950

MARK FOR: CLIN 4742 Price 3.42

DOLLARS: $ 20.

WAREHOUSE LOCATION: BLDG: 955

SUBSTITUTE DATA (ITEM ORIGINALLY REQUESTED): FREIGHT CLASSIFICATION NOMENCLATURE

OILY SLUDGE WITH WATER FROM OIL WATER SEPARATION

SELECTED BY AND DATE: 2203

TYPE OF CONTAINER: 55 GAL

RECEIVED BY AND DATE: 15

NO. OF CONTAINERS: ONE (1)

WAREHOUSE BY AND DATE: 2355

WAREHOUSE LOCATION: EAST CAMP

REMARKS

The above named material is properly [illegible] described, packaged, marked, [illegible] and is in proper condition for transportation according to EPA Regulations (40 [illegible] CFR [illegible] and [illegible] Regulations

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

BUILDING AND OF RECEIVER'S SIGNATURE AND DATE: CFR 170-189 [illegible] 12/21/84

Signed [illegible]

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

XA D PQ A HX P

DOC IDENT.	FROM	FSC	NIIN	ADD	QUANTITY	REQUISITIONER	DATE	SERIAL	ADDRESS	DISTRIBUTION	ADVICE
		9160	00-FUEL			W31JW8 9173		001			

SHIPPED FROM
AFVR-LIS-D 863-3212
FORT RICHARDSON, AK 99505
EPA = AK1210022157

SHIP TO
DRMO ANCHORAGE EAFB
SZ 362 D 552-4950
EPA = AK85=002864 9

MARK FOR: HW

PROJECT

WAREHOUSE LOCATION
Bldg: 986
POC: L. TILLAY

UNIT WEIGHT | CUBE | NMFC | FREIGHT RATE | QUANTITY

SUBSTITUTE DATA (ITEM ORIGINALLY REQUESTED)

FREIGHT CLASSIFICATION NOMENCLATURE
CONTAMINATED GASOLINE

ITEM NOMENCLATURE
CONTAMINATED GASOLINE

SUBMITTED BY AND DATE | TYPE OF CONTAINER | TOTAL WEIGHT | RECEIVED BY AND DATE: 7-12-97 | INSPECTED BY AND DATE

PACKED BY AND DATE | NO. OF CONTAINERS | TOTAL CUBE | WAREHOUSED BY AND DATE | WAREHOUSE LOCATION

The above named material is properly identified, described, packaged marked and labeled and is in proper condition for transport according to DOT Regulations (49 CFR Parts 170-189).

REMARKS

FINAL DESTINATION ADDRESS | DATE SHIPPED

Signed Lori Tillay Date 12 July

TRANSPORTATION CHARGEABLE TO | BLANKING AND OF RECEIVER'S SIGNATURE (AND DATE) | REQUISITION NUMBER

DD FORM 1348-1 (8 87) | 1 MAR 74 | EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED | DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUM

DOD IDENT. | FROM | FSC | NIIN | ADD | UNIT OF ISSUE | QUANTITY | DOCUMENT NUMBER | DATE | SERIAL | SIGNAL | FUND | DISTRIBUTION | PROJECT | DOLLARS

9150-00-OTL | GL | 5 | WC1JWP91730101 | H | A | H

SHIPPED FROM: AFVR-DE-PSE 863-3295
Fort Richardson, AK 99505 SZ 362 D 552-4950
EPA# AK1210022157

SHIP TO: DRMO Anchorage EAFB
EPA# AK1210022157

MARK FOR: HW

PROJECT: Fool Cleanup D001

DOLLARS: $5.0

WAREHOUSE LOCATION: BLDG: 955.

CARGO | PACK | UNIT WEIGHT | CUBE | FREIGHT RATE | DOCUMENT DATE | MAT COND | QUANTITY

SUBSTITUTE DATA (ITEM ORIGINALLY REQUESTED): 5 GAL CAN IN 16 GAL OVERPACK.

FREIGHT CLASSIFICATION NOMENCLATURE: WASTE OIL N.O.S., COMBUSTIBLE LIQUID UN1270

ITEM NOMENCLATURE: WASTE LUBE OIL CONTAMINATED WITH CHLORINATED SOLVENTS

RECEIVED BY AND DATE: RECEIVED OUT

SELECTED BY AND DATE: 9222 Weaver

SHIPPERS USE: 1 Merkel 9208 | 2 16 GAL OVERPACK | 3 .66

RECEIVERS USE: 7 CVC 46 | 8 9222

PACKED BY AND DATE: 82019

NO. OF CONTAINERS: 1 | TOTAL CUBE

WAREHOUSED BY AND DATE: 9222

WAREHOUSE LOCATION

REMARKS: 5 GL MT

PROPERTY OF THE DEPARTMENT OF THE ARMY, Fort Richardson

The above named materials properly identified, described, packaged, marked, and labeled, and is in proper condition for transportation according to EPA Regulations (40 CFR 260-265, and 761) and DOT Regulations

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

BILLING AWB, OR RECEIVER'S SIGNATURE AND DATE

THIS RECEIVER'S DOCUMENT NUMBER

Signed [illegible] Dated X/10/89

DD FORM 1348-1 (6 PT) 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

XRI D PG 22 2 A HX P

STOCK NUMBER				QUANTITY	DOCUMENT NUMBER																		
FSC	NIIN	MAT			REQUISITIONER	DATE	SERIAL																DOLLAR

SHIP FROM	SHIP TO		PROJECT		DOLLARS
[illegible] 89-395 Fort Richardson, AK 99505	DRO Anchorage, DAES SC 362 D [illegible]	[illegible]	[illegible]	[illegible]	

WAREHOUSE LOCATION	TYPE OF CARGO	PACK	UNIT WEIGHT	CUBE	NAME	FREIGHT RATE			QUANTITY
[illegible]									

SUBSTITUTE DATA ITEM ORIGINALLY REQUESTED FREIGHT CLASSIFICATION NOMENCLATURE

[illegible]

ITEM NOMENCLATURE

[illegible]

SHIPPED BY AND DATE	TYPE OF CONTAINERS	TOTAL WEIGHT	RECEIVED BY AND DATE	INSPECTED BY AND DATE
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

PACKED BY AND DATE	NO. OF CONTAINERS	TOTAL CUBE	WAREHOUSED BY AND DATE	WAREHOUSE LOCATION
	1			

REMARKS

The above named material is properly marked, described, packaged, marked, and labeled, and is in proper condition for transportation according to ICC Regulations (49 CFR Parts 170-189), and DOT Regulations (49 CFR Parts 100-199).

Signed _____ Dated _____

FINAL DESTINATION ADDRESS	DATE SHIPPED	

13 TRANSPORTATION CHARGEABLE TO	14 BILLING AND OF RECEIVERS SIGNATURE AND DATE	15 TRANSFER DOCUMENT NUMBER

DD FORM 1348-1 (6 PT.) 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

SHIPPED FROM	SHIP TO	MARK FOR	PROJECT
APVR-DE-PSE 863-3295 Fort Richardson, AK 99505 EPA# AK1210022157	DEMO Anchorage ZAFB SZ 362 D 552-4950 EPA# AK1210022157		EPA Waste & Debl

WAREHOUSE LOCATION: BLDG: 796 POC: J Mason

FREIGHT RATE

FREIGHT CLASSIFICATION NOMENCLATURE: Waste Paint, Telephone Material N.O.S.

ITEM NOMENCLATURE

SELECTED BY AND DATE	TOTAL WEIGHT	RECEIVED BY AND DATE	INSPECTED BY AND DATE
	475		

PACKED BY AND DATE	TOTAL CUBE	WAREHOUSED BY AND DATE	WAREHOUSE LOCATION

REMARKS:

The above named materials properly identified, described, packaged, marked and labled, and is in proper condition for transportation according to EPA Regulations (40 CFR 260-265, and 761) and DOT Regulations (49 CFR 170-189)

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

SIGNATURE AND DATE OF RECEIVER'S SIGNATURE AND DATE: Signed

RECEIVER'S DOCUMENT NUMBER: Dated

DD FORM 1348-1, 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

FSC	NIIN											
9999-00-S4111	DR0001	WC1UW8	03/8.150 1		WC152V				XP		N A	

SHIPPED FROM
AFVR-DE-PSE 862-0198
Ft. Richardson, AK 99505SZ 363 D 552-4950
EPA# AK1210022157

SHIPPED TO
DRMO Anchorage EMFB
EPA# AK1210022157

MARK FOR: EN

PROJECT: D001

Bldg. 374
POC: Peryak
862-0198

FREIGHT RATE

FREIGHT CLASSIFICATION NOMENCLATURE
Hazardous Waste Liquid NOS

ITEM NOMENCLATURE
Solid Bottom NOS Flammable Liquid

SELECTED BY AND DATE

TYPE OF CONTAINER: 55 Gal

TOTAL WEIGHT: 500

RECEIVED BY AND DATE

INSPECTED BY AND DATE

PACKED BY AND DATE

NO. OF CONTAINERS: 2

TOTAL CUBE

WAREHOUSED BY AND DATE

WAREHOUSE LOCATION

The above named material is proper identified, described, packaged, and labeled, and is in proper condition for transportation according EPA Regulations (40 CFR Parts 260-265 (61) and DOT Regulations (49 Parts 170-189).

REMARKS:

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

INCLUDING AMEDD RECEIVER'S SIGNATURE AND DATE

NUMBER

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

FSC	NIIN	ADD	UNIT ISSUE	QUANTITY	DOCUMENT NUMBER	DATE	SERIAL	SUPPLEMENTARY ADDRESS	SIGNAL	FUND	DISTRIBUTION	PROJECT	PRIORITY	REQUIRED DELIVERY DATE	DOLLARS	CT.
9999-00-Still	DR 0001	WC1JW6			0361500			WC15ZV				XP		N A.	34	

SHIPPED FROM	SHIP TO	MARK FOR	PROJECT	TOTAL PRICE DOLLARS	CT.
APVR-DE-PSI- 862-0188 Ft Richardson, Ak 99505 LPA# AK1210022157	DPM0 Anch. LAFB SZ 362 D 552-4950 LPA# AK1210022157	HW	F002	180	

WAREHOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N M F C	FREIGHT RATE	DOCUMENT DATE	MAT. COND	QUANTITY
Bldg. 974 POC: Penyak 862-0128										

SUBSTITUTE DATA ITEM ORIGINALLY REQUESTED

FREIGHT CLASSIFICATION NOMENCLATURE: Hazardous Waste Liquid NOS

ITEM NOMENCLATURE: Still Bottom NOS Combustible

SHIPPER USE			RECEIVER USE		
SELECTED BY AND DATE	TYPE OF CONTAINER(S)	TOTAL WEIGHT	RECEIVED BY AND DATE	INSPECTED BY AND DATE	
	55 Gal Drum				
PACKED BY AND DATE	NO. OF CONTAINERS	TOTAL CUBE	WAREHOUSED BY AND DATE	WAREHOUSE LOCATION	
	1				

REMARKS:

The above named material is properly identified, described, packaged, marked, and labeled, and is in proper condition for transportation according to DPA Regulations (40 CFR Parts 260-265 and 761 and DOT Regulations (49 CFR Parts 170-189).

Dated

FIRST DESTINATION ADDRESS

DATE SHIPPED

13 TRANSPORTATION CHARGEABLE TO

14 B/LADING, AWB, OR RECEIVER'S SIGNATURE AND DATE

DOCUMENT NUMBER

DD FORM 1346—1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

APVR-DE-PSE 862-0188, ext 119 SZ3620
Fort Richardson, AK 99505 DRMO Anchorage, POB 188
EPA#: AK1210022157 Elmendorf, AK 99506

Bldg#955

Jane Cudek

862-0188/ext 119 Fuel (Analyzed Amended)

Proceeds from the resale of this material are to be deposited into the Ft Richardson Resource

Package in accordance with Regulations 49 CFR 170-189

6010-PAINT · QUANTITY 20 · DOCUMENT NUMBER C261/502

SHIP FROM
?VR-DE-PSE 862-0188
?ORT RICHARDSON, AK 99505
?PA# AK1210022157

SHIP TO
DEMO ANCHORAGE EAFB
BZ 362 D 552-4950
EPA# AK1210022157

PROJECT
TOOL
/002

13th EN: EN.
Bldg 732

John E. Taylor

DO 3310

PAINT ... UN 1263

ITEM NOMENCLATURE
PAINT LATEX PORTER

INSPECTED BY AND DATE
SK 0761

NO. OF CONTAINERS
4

WAREHOUSE LOCATION
19 T C.C.A1

The above name material is properly identified described, packaged, marked, and labeled ~~and is in~~ ~~proper condition for transportation according~~ to EPA Regulation (40 CFR part 260-265) and DOT Regulation (49 CFR Part 170-189).

Signed ______ Dated ______

Form 1348-1, SEP 87 · JUN 86 edition may be used. · FORM APPROVED, OMB NO. 0704-0188 · DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

1999-00-Still

FROM: P-DE-PSE
Richardson, AK
AT1210022157

SHIP TO: DRMO Anchorage ZIPB
SZ 362 D 552-4950
EDAS AT1210022157

MARK FOR: HW

PROJECT

; 974
Permak

FREIGHT CLASSIFICATION NOMENCLATURE

ITEM NOMENCLATURE

55 Gal Drum — TOTAL WEIGHT 290

1 — TOTAL CUBE 12

The above material is properly identified, described, packaged, marked and labeled, and is in proper condition for transportation according to EPA Regulations 40 CFR Parts 262 and 761 and DOT Regulations (49 CFR Parts 170-189).

Signed

Dated 7 Oct 9

DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

RECEIVER'S DOCUMENT NUMBER

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

FSC	NIIN	ADD	UNIT OF ISSUE	QUANTITY	SUPPLEMENTARY ADDRESS	DATE	SERIAL	SUPPLY SERVICE	ADDRESS	SIGN	SUFFIX	EXT	PRI	DEL DATE	ADVICE	RI

SHIPPED FROM
APVR-DE-PSE 863-3295
Fort Richardson, Ak 99505
DTAA AF121000 2157

SHIP TO
DRMO Anchorage EAFB
SZ 362 D 552-4950
DTAA AF121000 2157

MARK FOR: EX

PROJECT: CLIN-4732 D221 F003 F005

WAREHOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N A F C	FREIGHT RATE	DOCUMENT DATE	MAT KDNG	QUANTITY
BLDG: 776					HX					

INSTITUTE DATA ITEM DESCRIPTION (DESCRIBED): 4.2.2.1.1

FREIGHT CLASSIFICATION NOMENCLATURE

ITEM NOMENCLATURE: WASTE FINISHED PETROLEUM PRODUCTS

SELECTED BY AND DATE	TYPE OF CONTAINER	TOTAL WEIGHT	RECEIVED BY AND DATE	INSPECTED BY AND DATE
FEA 55 IN 250	DRUMS	1510	CWC 37	

PACKED BY AND DATE	NO. OF CONTAINERS	TOTAL CUBE	WARE-HOUSED BY AND DATE	WARE-HOUSE LOCATION
D03313				

REMARKS:

AA BB CC

The above named materials properly identified, described, packaged, marked and labeled, and in in proper condition for transportation according to EPA Regulations (40 CFR 260-265, and 761) and DOT Regulations (49 CFR 100-

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

LOADING AND DELIVERY SIGNATURE AND DATE

RECEIVER'S DOCUMENT NUMBER

Signed Signed 16 Apr 89

DD FORM 1348-1 EDITION OF 1 JAN 68 MAY BE USED UNTIL EXHAUSTED

XRI D PSQ Z2 2 A HX

FSC | NIIN | QUANTITY | ADDRESS | DEL DATE

6810005511487 DR 0001 WC1JW80X570004 N A

SHIPPED FROM: AFVR-DE-PSE 862-0188
Ft. Richardson AK

SHIP TO: DRMO Anchorage EARS
SZ 362 D 552-4950

MARK FOR: 17 12

PROJECT: F002

WAREHOUSE LOCATION: Bldg 974

FREIGHT RATE

FREIGHT CLASSIFICATION NOMENCLATURE: DX-2831

SELECTED BY AND DATE: 1N5562 57 D 022 13

NO. OF CONTAINERS: 55 Gal

TOTAL WEIGHT: 415

RECEIVED BY AND DATE: 57

INSPECTED BY AND DATE

The above material is properly identified, described, packaged, marked and labeled, and is in proper condition for transportation according to the applicable (49 CFR Parts 100 and 761) and DOT Regulations (49 CFR Parts 170-189)

PACKED BY AND DATE

NO. OF CONTAINERS: 1

TOTAL CUBE

REMARKS

FIRST DESTINATION ADDRESS

DATE SHIPPED

Signed _____ Dated _____

TRANSPORTATION CHARGEABLE TO

SIGNATURE AND DATE

RECEIVER'S DOCUMENT NUMBER

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED. DDC SINGLE LINE ITEM RELEASE/RECEIPT DOCU

XRI D DPQ 22 2 A HX P

8030002211834 DR0001

SHIPPED FROM
APVR-DE-PSE 862-0188
Fort Richardson AK
EPA# AK1210022157

SHIP TO
DRMO Anchorage EAFB
SZ 362 D 552-4950
EPA# AK1210022157

MARK FOR / PROJECT
HW
D006-D007-D008

WAREHOUSE LOCATION
Bldg 974
FDC Petrak

FREIGHT CLASSIFICATION NOMENCLATURE
Waste [illegible] 105 LBS LIA

862-9105

ITEM NOMENCLATURE
Undercoating

0157

SELECTED BY AND DATE
55 GAL

TYPE OF CONTAINER
55 Gal

TOTAL WEIGHT
600

RECEIVED BY AND DATE
37

INSPECTED

The above material is properly ide[illegible] and labeled, and is in proper con[illegible] for transportation accordin[illegible] EPA Regulations (40 CFR Parts 260 and 761) and DOT Regulations (49 [illegible] Parts 170-189)

NO. OF CONTAINERS
1

TOTAL CUBE

REMARKS:

FIRST DESTINATION ADDRESS

DATE SHIPPED

TRANSPORTATION CHARGEABLE TO

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DO

XAI D PQ A HX

Fort Richardson, AK. SE 362 D 552-4950 D001 27.

TPAF AK1210022157 ~~TPAF AK1210022157~~

WAREHOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE		FREIGHT RATE	DOCUMENT DATE	DOCUMENT NUMBER	QUANTITY
Bldg. 974 DOC Depot	G	H	I	J	HX L	M	N	O	P Q R S 1

SUBSTITUTE DATA ITEM (ORIGINALLY REQUESTED)	FREIGHT CLASSIFICATION NOMENCLATURE
BE2-0105	U ~~Turpentine, UN 1299~~ V
ITEM NOMENCLATURE	
W 55 GAL.	X ~~Turpentine, Flammable NOS~~ Y

SHIPPERS USE				RECEIVERS USE	
SELECTED BY AND DATE	TYPE OF CONTAINER	TOTAL WEIGHT		RECEIVED BY AND DATE	INSPECTED BY AND DATE
55 GAL DR 1	55 Gal. Drum	456 ~~500 lb~~		CUC	
PACKED BY AND DATE	NO. OF CONTAINERS	TOTAL CUBE		WAREHOUSED BY AND DATE	WAREHOUSE LOCATION
DO 3/3 4	5 1	6			

The above material is properly ~~labeled, described, packaged, marked~~ and labeled, and is in proper condition for transportation according ~~to DOT Regulations (49 CFR Parts 260~~ and 761) and DOT Regulations (49 Parts 170-189) 105 T 0552

REMARKS:

AA BB CC DD EE

FIRST DESTINATION ADDRESS	DATE SHIPPED	
11	12	FF Signed _____ Dated 43

13 TRANSPORTATION CHARGEABLE TO	14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)	15 RECEIVER'S DOCUMENT NUMBER

DD FORM 1346-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED DOD SINGLE LINE ITEM RELEASE/RECEIPT DOC

XRI D PQ Z2-2-A HX P

Fort Richardson, Ak 99505 | SZ 362 D 552-4950

A EPA# AK1210022157 | B EPA# AK1210022157 | C | D 552 | E

WAREHOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N M F C	FREIGHT RATE	DOCUMENT DATE	DOCUMENT NUMBER	QUANTITY		
BLDG: 776. POC: D Hendel	G	H	I	J	K HX	L	M	N	O	P	Q	R	S 2

SUBSTITUTE DATA ITEM (ORIGINALLY REQUESTED)	FREIGHT CLASSIFICATION NOMENCLATURE	
T RL3-HQ1	U CORROSIVE LIQUID, NOS, UNITS	V
	ITEM NOMENCLATURE	
W EA 5 GL CANS	X CHEMICAL AID	Y

SHIPPERS USE				RECEIVERS USE		
SELECTED BY AND DATE	TYPE OF CONTAINER (S)	TOTAL WEIGHT		RECEIVED BY AND DATE	INSPECTED BY AND DATE	
1 IN 2 EA 15 GL DR DO # 3313	2 5 GAL	3 80		7 CVC 37	8 Woolum	
PACKED BY AND DATE	NO. OF CONTAINERS	TOTAL CUBE		WAREHOUSED BY AND DATE	WAREHOUSE LOCATION	
4 10 GAL TOTAL	5 10 (2)	6		9	10 STORAGE	

REMARKS:

AA | BB | CC

The above named materials properly identified, described, packaged, marked and labled, and is proper condition for transportation according t EPA Regulations (40 CFR 260-265, and 761) and I Regulations (49 CFR 170-189).

FIRST DESTINATION ADDRESS	DATE SHIPPED	
11	12	
13 TRANSPORTATION CHARGEABLE TO	14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)	15 RECEIVER'S DOCUMENT NUMBER
	Signed	Dated

DD FORM 1346-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUM

XRI D PQ Z2 2 A HX P

01570012

UNIT PRICE DOLLARS CTS. 274.05

PSE 862-0188
hardson, Ak.
210022157

SHIP TO
DRMO Anchorage EAFB
SZ 362 D 552-4950
EPA# AK1210022157

MARK FOR

PROJECT D001

TOTAL PRICE DOLLARS CTS. 274.05

TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N M F C	FREIGHT RATE		DOCUMENT DATE	MAT. COND	QUANTITY		
G	H	I	J	K	L	M	N	O	P	Q	R	S /

FREIGHT CLASSIFICATION NOMENCLATURE
U Turpentine, UN 1299

ITEM NOMENCLATURE
X Turpentine, Flammable NOS

TYPE OF CONTAINER(S): 55 Gal Drum
TOTAL WEIGHT: 5500 lb
NO. OF CONTAINERS: 1
TOTAL CUBE

RECEIVED BY AND DATE
INSPECTED BY AND DATE
WAREHOUSED BY AND DATE
WAREHOUSE LOCATION

The above material is properly identified, described, packaged, marked, and labeled, and is in proper condition for transportation according to EPA Regulations (40 CFR Parts 260-265 and 761) and DOT Regulations (49 CFR Parts 170-189)

Signed ______________________ Dated ____________

BB
CC
DD
EE
FF
GG

TION ADDRESS

DATE SHIPPED
12

ATION CHARGEABLE TO

14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)

15 RECEIVER'S DOCUMENT NUMBER

1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

# AR1210022157								EPA# AR1210022157									75.00
USE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N M F C	FREIGHT RATE		DOCUMENT DATE	DOCUMENT CODE	QUANTITY				
g-974 Ponyak	G	H	I	J	K	L	M		N	O	P	Q	R	S	
DATA ITEM (ORIGINALLY REQUESTED) -9105			FREIGHT CLASSIFICATION NOMENCLATURE Waste Undercoating NOS NA 1993 U						V						
			ITEM NOMENCLATURE Undercoating X						Y						
ECTED BY AND DATE			TYPE OF CONTAINER (S) 55 Gal Drum 2	TOTAL WEIGHT 3			RECEIVED BY AND DATE				INSPECTED BY AND DATE				
KED BY AND DATE			NO. OF CONTAINERS 1 5	TOTAL CUBE 6							WAREHOUSE LOCATION				
KS:	BB		CC				DD				EE				
ESTINATION ADDRESS			DATE SHIPPED 12				FF Signed				GG Dated				
SPORTATION CHARGEABLE TO			14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)						15 RECEIVER'S DOCUMENT NUMBER						

RECEIVER'S USE

The above material is properly identified, described, packaged, marked, and labeled, and is in proper condition for transportation according to EPA Regulations (40 CFR Parts 260-265 and 761) and DOT Regulations (49 CFR Parts 170-189)

M 1346-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

VR-DE-PSE 862-0188
. Richardson AK
AK1210022157

DRMO Anchorage EAIE
SZ 362 D 552-4950
EPA# AK1210022157

F002

411.08

HOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	U F C	N M F C	FREIGHT RATE	DOCUMENT DATE	MAT. CGRD	QUANTITY
lg. 974 C Ponyah	G	H	I	J	K	L	M	N	O	P

(UTE DATA ITEM ORIGINALLY REQUESTED)
362-9105

FREIGHT CLASSIFICATION NOMENCLATURE
UN-2831
U Trichloroethane 111 SOL [redacted]

ITEM NOMENCLATURE
Trichloroethane 111 Solvent P[redacted] NOS

ELECTED BY AND DATE

TYPE OF CONTAINER (S)
55 Gal Drum

TOTAL WEIGHT
475 Lbs.

RECEIVER'S USE

RECEIVED BY AND DATE

INSPECTED BY AND DATE

The above material is properly identified, described, packaged, marked, and labeled, and is in proper condition for transportation according to EPA Regulations (40 CFR Parts 260-265 and 761) and DOT Regulations (49 CFR Parts 170-189)

ACKED BY AND DATE

NO. OF CONTAINERS
1

TOTAL CUBE

WAREHOUSE (S) AND DATE

WAREHOUSE LOCATION

ARKS:

BB

CC

DD

EE

DESTINATION ADDRESS

DATE SHIPPED

Signed

Dated

FF

GG

ANSPORTATION CHARGEABLE TO

14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)

15 RECEIVER'S DOCUMENT NUMBER

FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

21. B. and E. Fort Richardson shall conduct weekly inspections at 45-125 and comply with 40 CFR 265.174 and shall not store hazardous waste for greater than 90 days in areas that have not been permitted for storage or granted interim status.

Response:

A weekly inspection log is now being maintained at 45-125 which includes the date and time of the inspection, the name of the inspector and comments. (A copy of the latest inspection log is attached.)

All attempts are being made to educate the generators about proper turn in procedures so that waste will not be stored at their facilities for more than 90 days. Quarterly inspections have been implemented by the Environmental Branch to identify problem areas and help the generators get their waste turned in in a timely manner.

DAILY BUILDING FIRE INSPECTION RECORD

BUILDING NUMBER	MONTH AND YEAR
45125	Feb 91

INSTRUCTIONS - APPROPRIATE ENTRIES WILL BE MADE ON THIS FORM DAILY BY THE BUILDING CUSTODIAN OR LAST OCCUPANT TO LEAVE THE BUILDING AT CLOSE OF THE DAY'S OPERATIONS.

The following *(where applicable)* has been accomplished prior to securing the building or section thereof at the close of the day's operations:

1. PROPER DISPOSAL OF ALL WASTE MATERIAL.

2. BUILDING INSPECTED FOR SMOLDERING TOBACCO.

3. PROPER DISPOSAL OF CONTENTS OF ASH TRAYS AND BUTT CANS.

4. HEATING UNITS SECURED IN ACCORDANCE WITH EXISTING SOP.

5. FIRE DOORS OPERATIVE AND ENTRANCES CLEAR.

6. UNNECESSARY ELECTRICAL APPLIANCES DISCONNECTED.
7. SECURITY CAGES & CONTAINERS

DAY	SIGNATURE OF RESPONSIBLE PERSON	GRADE	TIME	REMARKS
1				
2				
3				
4				
5	"			
6	"	1166	1115	OK
7	"			
8				
9				
10				
11	[illegible]	1166	1100	OK
12	" "			
13				
14				
15				
16				
17				
18				
19				
20	[illegible]	1166	0900	OK
21	" "			
22				
23				
24				
25				
26				
27	[illegible]	1166	0900	OK
28	" "			
29				
30				
31				

6th INF DIV (L) FORM 124 PREVIOUS EDITION WILL BE USED UNTIL STOCK IS EXHAUSTED
1 JUN 86

DATE 6 FEB 91

AREA/BLDG 45-125

TIME 09:45

HM/HW

INSPECTION LOG

SIGNATURE OF INSPECTOR Jerry Kantarzis

JERRY KANTARZIS

	SAT*	UNSAT*	PROBLEMS FOUND	CORRECTIVE ACTION TAKEN
FACILITY (DAILY)/WHEN IN OPER.				
SECURITY OF DOORS	✓			
SECURITY OF WINDOWS	NA			
SECURITY OF GATES	✓			
SEC. OF FENCES/WARNING SIGNS	✓			
EVIDENCE OF LEAKS	✓			
EVIDENCE OF TAMPERING	✓			
EVIDENCE OF DAMAGE	✓			
TEMPERATURE CONTROL	✓			
DRAINAGE CONTROL	NA			
WATER PRESSURE/VOLUME	✓			
SPRINKLER	✓			
"NO SMOKING" SIGNS	✓			
OTHER				
OTHER				
EQUIPMENT & SUPPLIES (WEEKLY)				
EYE WASH OPERATION	✓			
ALARM OPERATION	✓			
COMMUNICATION SYSTEM OPER.	✓			
FIRE EXTINGUISHERS	✓			
MHE OPERABLE	✓			
ABSORBENTS AVAILABLE	✓			
EYE SHIELDS AVAILABLE/IN USE	✓			
PROTEC. GLOVES AVAIL./IN USE	✓			
EMERGENCY CLOTHING AVAILABLE	✓			
OTHER				
OTHER				
MATERIAL (DAILY)/WHEN IN OPER.				
LEAKS/SPILLS	✓			
ODORS/FUMES	✓			
EVIDENCE OF TAMPERING DAMAGE	✓			
OTHER				

* "NA" NOT APPLICABLE
* "NI" IF NOT INSPECTED
* ( )CHECK APPROPRIATE BLOCK

DATE 11 FEB 91

AREA/BLDG 475-125

TIME 11:00

HM/HW

INSPECTION LOG

SIGNATURE OF INSPECTOR [illegible]

	SAT*	UNSAT*	PROBLEMS FOUND	CORRECTIVE ACTION TAKEN
FACILITY (DAILY)/WHEN IN OPER.				
SECURITY OF DOORS	✓			
SECURITY OF WINDOWS	N/A			
SECURITY OF GATES	✓			
SEC. OF FENCES/WARNING SIGNS	✓			
EVIDENCE OF LEAKS	✓			
EVIDENCE OF TAMPERING	✓			
EVIDENCE OF DAMAGE	✓			
TEMPERATURE CONTROL	✓			
DRAINAGE CONTROL	N/A			
WATER PRESSURE/VOLUME	✓			
SPRINKLER	✓			
"NO SMOKING" SIGNS	✓			
OTHER				
OTHER				
EQUIPMENT & SUPPLIES (WEEKLY)				
EYE WASH OPERATION	✓			
ALARM OPERATION	✓			
COMMUNICATION SYSTEM OPER.	✓			
FIRE EXTINGUISHERS	✓			
MHE OPERABLE	✓			
ABSORBENTS AVAILABLE	✓			
EYE SHIELDS AVAILABLE/IN USE	✓			
PROTEC. GLOVES AVAIL./IN USE	✓			
EMERGENCY CLOTHING AVAILABLE	✓			
OTHER				
OTHER				
MATERIAL (DAILY)/WHEN IN OPER.				
LEAKS/SPILLS	✓			
ODORS/FUMES	✓			
EVIDENCE OF TAMPERING DAMAGE	✓			
OTHER				

* "NA" NOT APPLICABLE
* "NI" IF NOT INSPECTED
* ( )CHECK APPROPRIATE BLOCK

DATE 20 FEB 91

AREA/BLDG 45-125

TIME 0900

HM/HW

INSPECTION LOG

SIGNATURE OF INSPECTOR [illegible]

	SAT*	UNSAT*	PROBLEMS FOUND	CORRECTIVE ACTION TAKEN
FACILITY (DAILY)/WHEN IN OPER.				
SECURITY OF DOORS	✓			
SECURITY OF WINDOWS	N/A			
SECURITY OF GATES	✓			
SEC. OF FENCES/WARNING SIGNS	✓			
EVIDENCE OF LEAKS	✓			
EVIDENCE OF TAMPERING	✓			
EVIDENCE OF DAMAGE	✓			
TEMPERATURE CONTROL	✓			
DRAINAGE CONTROL	N/A			
WATER PRESSURE/VOLUME	✓			
SPRINKLER	✓			
"NO SMOKING" SIGNS	✓			
OTHER				
OTHER				
EQUIPMENT & SUPPLIES (WEEKLY)				
EYE WASH OPERATION	✓			
ALARM OPERATION	✓			
COMMUNICATION SYSTEM OPER.	✓			
FIRE EXTINGUISHERS	✓			
MHE OPERABLE	✓			
ABSORBENTS AVAILABLE	✓			
EYE SHIELDS AVAILABLE/IN USE	✓			
PROTEC. GLOVES AVAIL./IN USE	✓			
EMERGENCY CLOTHING AVAILABLE	✓			
OTHER				
OTHER				
MATERIAL (DAILY)/WHEN IN OPER.				
LEAKS/SPILLS	✓			
ODORS/FUMES	✓			
EVIDENCE OF TAMPERING DAMAGE	✓			
OTHER				

* "NA" NOT APPLICABLE
* "NI" IF NOT INSPECTED
* ( )CHECK APPROPRIATE BLOCK

TE 27 FEB 91

EA/BLDG 45-125

IME 08:00

HM/HW

INSPECTION LOG

SIGNATURE OF INSPECTOR [illegible]

	SAT*	UNSAT*	PROBLEMS FOUND	CORRECTIVE ACTION TAKEN
ILITY (DAILY)/WHEN IN OPER.				
ECURITY OF DOORS	✓			
ECURITY OF WINDOWS	N/A			
ECURITY OF GATES	✓			
EC. OF FENCES/WARNING SIGNS	✓			
VIDENCE OF LEAKS	✓			
VIDENCE OF TAMPERING	✓			
VIDENCE OF DAMAGE	✓			
EMPERATURE CONTROL	✓			
RAINAGE CONTROL	N/A			
ATER PRESSURE/VOLUME	✓			
PRINKLER	✓			
"NO SMOKING" SIGNS	✓			
THER				
THER				
UIPMENT & SUPPLIES (WEEKLY)				
EYE WASH OPERATION	✓			
LARM OPERATION	✓			
OMMUNICATION SYSTEM OPER.	✓			
IRE EXTINGUISHERS	✓			
HE OPERABLE	✓			
BSORBENTS AVAILABLE	✓			
EYE SHIELDS AVAILABLE/IN USE	✓			
ROTEC. GLOVES AVAIL./IN USE	✓			
MERGENCY CLOTHING AVAILABLE	✓			
THER				
THER				
ERIAL (DAILY)/WHEN IN OPER.				
EAKS/SPILLS	✓			
DORS/FUMES	✓			
VIDENCE OF TAMPERING DAMAGE	✓			
THER				

* "NA" NOT APPLICABLE
* "NI" IF NOT INSPECTED
* ( )CHECK APPROPRIATE BLOCK

ATE 20 FEB 91

REA/BLDG 45-125

IME 0900

HM/HW

INSPECTION LOG

SIGNATURE OF INSPECTOR [illegible]

	SAT*	UNSAT*	PROBLEMS FOUND	CORRECTIVE ACTION TAKEN
ACILITY (DAILY)/WHEN IN OPER.				
SECURITY OF DOORS	✓			
SECURITY OF WINDOWS	N/A			
SECURITY OF GATES	✓			
SEC. OF FENCES/WARNING SIGNS	✓			
EVIDENCE OF LEAKS	✓			
EVIDENCE OF TAMPERING	✓			
EVIDENCE OF DAMAGE	✓			
TEMPERATURE CONTROL	✓			
DRAINAGE CONTROL	N/A			
WATER PRESSURE/VOLUME	✓			
SPRINKLER	✓			
"NO SMOKING" SIGNS	✓			
OTHER				
OTHER				
QUIPMENT & SUPPLIES (WEEKLY)				
EYE WASH OPERATION	✓			
ALARM OPERATION	✓			
COMMUNICATION SYSTEM OPER.	✓			
FIRE EXTINGUISHERS	✓			
MHE OPERABLE	✓			
ABSORBENTS AVAILABLE	✓			
EYE SHIELDS AVAILABLE/IN USE	✓			
PROTEC. GLOVES AVAIL./IN USE	✓			
EMERGENCY CLOTHING AVAILABLE	✓			
OTHER				
OTHER				
ATERIAL (DAILY)/WHEN IN OPER.				
LEAKS/SPILLS	✓			
ODORS/FUMES	✓			
EVIDENCE OF TAMPERING DAMAGE	✓			
OTHER				

* "NA" NOT APPLICABLE
* "NI" IF NOT INSPECTED
* ( )CHECK APPROPRIATE BLOCK

21.D. Fort Richardson shall mark containers of hazardous waste with the "accumulation state date" at building 955, 704, and 796 and comply with 40 CFR 262.34(a)(2). Fort Richardson shall label containers with the date received into storage at building 45125 as required by 40 CFR 268.50(a)(2)(i).

Response:

Fort Richardson is marking containers of hazardous waste with the "accumulation start date" at buildings 955, 704, and 796 and labeling containers with the date received into storage at building 45125.

21.C. Fort Richardson shall label drums containing hazardous waste at buildings 955, 704, 740, 796 and 47-431 and comply with 40 CFR 262.34(a)(3).

Response:

The drums at buildings 955, 704, 740, 796 and 47-432 (requirement lists wrong building #) were properly labeled before turn-in was accomplished. The drums at building 704 have not been labeled yet because, as indicated in the response to 21.A., the lab results have not yet been received. As soon as the lab results are received, the drums will be properly labeled and turned-in.

21. H. Fort Richardson shall notify the treatment, storage, and disposal facility of the appropriate treatment standards and applicable prohibitions as required by 40 CFR 268.7(a).

Response:

As of 31 December 1990, Fort Richardson completes a land ban notification to accompany any manifest sent from Fort Richardson. Prior to that date, the land ban notifications were completed by the DRMO when the waste was shipped. Attached is a copy of a land ban notification prepared by Fort Richardson Environmental Office.

RESTRICTED WASTE NOTIFICATION

MANIFEST NUMBER

INSTRUCTIONS

1. *Fill in corresponding manifest number.*
2. *Fill in EPA waste number, Treatment subcategory, Treatability group, Treatment standard or 40 CFR reference.*
3. *Sign and date form below.*
4. *Attach waste analysis data, where available.*
5. *Retain one copy with the manifest.*

NOTIFICATION STATEMENT

This notification is provided IAW 40 CFR Part 268.7(a)(1). The above numbered manifest includes the following wastes which are prohibited from land disposal (except injection wells) unless an exemption has been granted pursuant to a petition under 268.6 or the applicable treatment standards have been met. Wastes that have a capacity variance as established by EPA may be land disposed in facilities that meet EPA minimum technological requirements for land disposal units.

EPA NO.	TREATMENT SUBCATEGORY	TREATABILITY GROUP	STANDARD OR REFERENCE	VARIANCE DATE
D001	High TOC ig. liquid	non-wastewater	FSUBS RORGs INCIN	Aug 8 1990
U161	Methyl Isobutyl Ketone	non-wastewater	INCIN	Aug 8 1990

D OR PRINTED | SIGNATURE | DATE

21. F. Fort Richardson shall transfer the hazardous waste from a container in poor condition or manage waste in a way to comply with part 265 at buildings 45-125 and 704 as required by 40 CFR 265.171.

Response:

Waste at both buildings has been transferred into serviceable containers. As containers become unserviceable, further transfers will be made until turn in is accomplished.

21. G. Fort Richardson shall close containers holding hazardous waste when not in use at buildings 700 and 704.

Response:

Fort Richardson is closing containers holding hazardous waste when not in use at buildings 700 and 704.

STOCK NUMBER	QUANTITY	DOCUMENT NUMBER	SUPPLEMENTARY ADDRESS					
FSC / NIIN / ADD	366	REQUISITIONER / DATE / MARK						UNIT PRICE / DOLLARS
6810-00-Tetra		0216503	DLIS-EU XP					

SHIPPED FROM	SHIP TO	MARK FOR	PROJECT	TOTAL PRICE / DOLLARS
APVR-DE-PSE B63-3295 Fort Richardson, AK 99505 FD1&AK/210022157	DRMO Anchorage, EFB SZ 362 D 552-4950 FD1 & AK/210022157	HW	XF001 XF002	

MANUFACTURER CENTER	TYPE CARGO	UNIT PRICE	DATE			DOCUMENT DATE	QUANTITY	
DOL Laundry Bldg # 725				X				36

SUBSTITUTE DATA ITEM PREVIOUSLY ACQUIRED	PROPER SHIPPING NOMENCLATURE	
DOD: Heavy Tankers	Tetrachloroethylene (PCE) UN 1897	CLASS 6.1
428-1370	ITEM NOMENCLATURE Tetrachloroethylene spill hazmat	

SHIPPED FROM AND DATE	TOTAL WEIGHT	TOTAL CUBE	RECEIVED FROM AND DATE	REPORTED FROM AND DATE
DO 33-4	55 Gal DOD-DPS	366	03	Unopened

REPORTED FROM AND DATE	REPORTED TO AND DATE	TOTAL CUBE	WAREHOUSED FROM AND DATE	WAREHOUSE LOCATION
				135-XAA1

REMARKS		
		The above name material is properly identified, described, packaged, marked, and labelled and in proper condition for transportation according to EPA regulations (40 CFR 250-265 and 261) DOT Regulations (49 CFR 170-189)

NET DESTINATION ADDRESS	DATE SHIPPED	

TO THE TRANSPORTATION CARRIER(S) TO	REMARKS APPLICABLE TO CARRIER(S)	

DD Form 1348-1, SEP 67 — PREVIOUS EDITION MAY BE USED — FORM APPROVED, OMB NO. 0704-0188 — DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUM

21.I. Fort Richardson shall cease taking hazardous waste from building 726 and any other building to the Hiland Road Landfill. Fort Richardson shall submit a report indicating measures to correct this violation and explain what will be done to prevent it from recurring.

Response:

Fort Richardson has ceased taking hazardous waste from building 726 to the Hiland Road Landfill. The attached documents show waste received from this facility since they were told to cease putting it in their dumpster. This is a GOCO facility, and the contract renewal now incorporates by reference the requirements of Army Regulation 200-1, Environmental Protection and Enhancement, and 6th ID(L) Regulation 420-4, Standard Operating Procedures (SOP) for Treatment, Storage, and Disposal of Hazardous Waste, which delineate appropriate disposal methods.

NSN Tetra

6810-00- [illegible] GL 55 [illegible]6201 1509

DOLLARS

SHIPPED FROM
APVR-DE-PSE 863-3295
Fort Richardson, AK 99505
EPA# AK[illegible]

SHIP TO
DRMO Anchorage, EAFB
SE 362 D 552-4950
EPA # AK[illegible]

MARK FOR
EW

PROJECT
P001
P002
P00[illegible]

WAREHOUSE LOCATION
DOL Laundry
Bldg# 726

SUBSTITUTE DATA (ITEM ORIGINALLY REQUESTED)
POC: Henry Jackson
[illegible]

FREIGHT CLASSIFICATION NOMENCLATURE
Tetrachloroethylene CERCLA UN 1897

ITEM NOMENCLATURE
Tetrachloroethylene still bottoms

55 GAL
overpack

REMARKS

The above named material is properly identified, described, packaged, marked, and labelled and in proper condition for transportation according to EPA Regulations (40 CFR 260-265 and 761) DOT Regulations (49 CFR 170-189).

SIGNED
DATE

TRANSPORTATION CHARGEABLE TO

DD FORM 1348-1
(6 PT)
MAR 74
EDITION OF 1 JAN 64 MAY BE USED
UNTIL EXHAUSTED
DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

C.6.1 PUBLICATIONS:

C.6.1.1 ALL PUBLICATIONS THAT ARE LISTED ARE VALID AS OF THE EFFECTIVE DATE OF THIS SOLICITATION. THEY ARE AVAILABLE FOR REVIEW AT THE POST LAUNDRY FACILITIES DURING NORMAL OPERATING HOURS. PUBLICATIONS ARE NOTED AS MANDATORY (M) OR ADVISORY (A).

REGULATIONS	DATE	TITLE
AR 11-27 (A)	JUL 85	ARMY ENERGY PROGRAM
AR 190-22 (A)	JAN 83	MILITARY POLICE-SEARCH, SEIZURE AND DISPOSITION OF PROPERTY
AR 190-51 (A)	MAR 86	SECURITY OF ARMY PROPERTY AT UNIT & INSTALLATION LEVEL
AR 200-1 (M)	JUN 82	ENVIRONMENTAL PROTECTION AND ENHANCEMENT
AR 210-130 (M)	AUG 86	[illegible] OPERATIONS
AR 385-10 (M)	MAY 88	SAFETY-ARMY SAFETY PROGRAM
AR 385-40 (M)	APR 87	SAFETY-ACCIDENT REPORTING AND RECORDS
AR 670-1 (M)	MAY 87	WEAR AND APPEARANCE OF ARMY UNIFORM AND INSIGNIA
UNIT SUPPLY UPDATE (A)	OCT 89	LOGISTICS
AR 700-84		ISSUE AND SALE OF PERSONAL CLOTHING
AR 710-2		SUPPLY POLICY BELOW THE WHOLESALE LEVEL
AR 710-2-1		USING UNIT SUPPLY SYSTEM MANUAL PROCEDURES
AR 735-5 (A)	FEB 88	POLICIES AND PROCEDURES FOR PROPERTY ACCOUNTABILITY
DA PAM 738-750 (A)	DEC 83	THE ARMY MAINTENANCE MANAGEMENT SYSTEM (TAMMS)
MIL-STD-665C (M)	FEB 74	LAUNDERING OF CLOTHING AND EQUIPAGE
MIL-STD-666C (M)	JUL 68	DRY CLEANING OF CLOTHING AND EQUIPAGE
MIL-STD-105 (M)		RANDOM SAMPLING GUIDE
I F I		MEMBERSHIP TO INTERNATIONAL FABRICARE INSTITUTE
6TH ID 420-4 (M)		STANDARD OPERATING PROCEDURES (SOP) for TREATMENT STORAGE, AND DISPOSAL OF HAZARDOUS [illegible]

6TH ID SUPPLEMENTAL REGULATIONS

6TH ID SUPPL TO 11-27	ARMY ENERGY PROGRAM
6TH ID SUPPL TO 200-1	ENVIRONMENTAL PROTECTION AND ENHANCEMENT
6TH ID SUPPL TO 190-22	MILITARY POLICE-SEARCH, SEIZURE AND DISPOSITION OF PROPERTY

C.6.2 **FORMS:** FORMS REQUIRED BY THE GOVERNMENT IN THE ACCOMPLISHMENT OF THE CONTRACTOR'S MISSION, WILL BE PROVIDED AT NO COST TO THE CONTRACTOR. FORMS REQUIRED TO BE USED ARE:

FORM	TITLE
DA FORM 17	REQUISITION FOR PUBLICATIONS AND BLANK FORMS
DA FORM 17-1	REQUISITION FOR PUBLICATIONS AND BLANK FORMS (CONTINUATION SHEET)
DA FORM 285	UNITED STATES ARMY ACCIDENT INVESTIGATION REPORT
DA FORM 1167	REQUEST FOR APPROVAL OF FORM
DA FORM 1687	NOTICE OF DELEGATION OF AUTHORITY-RECEIPT FOR SUPPLIES
DA FORM 1874	LAUNDRY LIST
DA FORM 2876	ABSTRACT OF LAUNDRY OR DRY CLEANING ORGANIZATIONAL WORK
DA FORM 2404	ORGANIZATIONAL CONTROL RECORD FOR EQUIPMENT
DA FORM 2407	MAINTENANCE REQUEST
DA FORM 2408	EQUIPMENT MAINTENANCE LOG
DA FORM 2707	DRY CLEANING LIST
DA FORM 2765-1	REQUEST FOR ISSUE OR TURN-IN
DA FORM 2886	LAUNDRY LIST FOR MILITARY PERSONNEL
DA FORM 3136	ROSTER AND STATEMENT
DA FORM 3137	ABSTRACT OF ENLISTED AND ORGANIZATIONAL LAUNDRY AND DRY CLEANING

21.J. Fort Richardson shall cease storing additional hazardous waste at building 704 for greater than 90 days.

Response:

Fort Richardson has ceased storing additional hazardous waste at building 704 for greater than 90 days. The wastes which are at building 704 are presently being identified through AEHA. When this waste is removed, any additional waste deposited will be noticed immediately and be treated as an illegal disposal activity. Personnel at building 704 have been advised of proper disposal procedures.

21. E. Fort Richardson shall cease storing hazardous waste at building 45-590 for greater than 90 days.

Response:

Fort Richardson has ceased storing hazardous waste at building 45-590.

21. L. Fort Richardson shall segregate incompatible wastes as required by 40 CFR 265.177(c) at building 798.

Response:

Fort Richardson is segregating incompatible wastes at building 798.

21.M. Fort Richardson shall submit a revised Part A application that indicates all waste types generated at the facility.

Response:

The revised Part A application was submitted to the EPA Region X Waste Management Branch on 25 September 1990, a copy of the transmittal letter and the revised Part A are attached.

DEPARTMENT OF THE ARMY
HEADQUARTERS, 6th INFANTRY DIVISION (LIGHT)
AND US ARMY GARRISON, ALASKA
FORT RICHARDSON, ALASKA

REPLY TO
ATTENTION OF:

September 25, 1990

Directorate of Engineering and Housing

U.S. Environmental Protection Agency
Region X
Waste Management Branch
Mail Stop HW-112
1200 Sixth Avenue
Seattle, Washington 98101

Dear Sir:

Enclosed are the original Applications for a Hazardous Waste Permit - Part A for Fort Richardson and Fort Greely, Alaska. A copy of the application for Fort Wainwright is also enclosed. The original has been sent to Battle Creek, Michigan, to be signed by the operator of the facility, and will be forwarded to you as soon as possible.

We are also sending a copy of these applications to Mr. Jeffery L. Koch, Chief of Solid and Hazardous Waste Management Section, Alaska Department of Environmental Conservation, Juneau, Alaska.

If you have any questions, please contact Cristal Tosteson, Environmental Engineer, (907) 553-3338, extension 110.

Sincerely,

Edwin B. Rudd
Colonel, U.S. Army
Director of Engineering and Housing

Enclosures