

GLACIER NATIONAL PARK	Procedure No. 6-1	Date: February, 2006
	Approved:	
<i>Safety & Health Program</i>		
Hazardous Waste Management	Revision: 0	Total pages: 21

Under RCRA legislation, the State of Montana is authorized to administer its own hazardous waste program. The state agency responsible for this is the Waste and Underground Tank Management Bureau (WUTMB) of the Department of Environmental Quality. The WUTMB also has regulatory authority over all Federal agencies within the state.

2.0 Summary of Generator Requirements

Glacier National Park (GNP) has been determined to be a generator of hazardous waste. Almost all of the waste generated is from incomplete use of previously purchased products. GNP is not in the business of treating, disposing, transporting or storing hazardous waste.

2.1 GNP has submitted notification, as a hazardous waste generator, to the WUTMB. Currently, Glacier is classified as a conditionally exempt generator. There are three types of generators; large generators, who generate over 2,200 lbs of hazardous waste per month, small generators produce between 220lbs and 2,200lbs of hazardous waste per month, and conditionally exempt generators, produce less than 220 lbs. of hazardous waste per month.

2.2 The Park must determine if wastes generated, are hazardous. This is easily done using Material Safety Data Sheets(MSDS) and material labels. If unable to determine if material is hazardous, analytical testing from a certified laboratory may be needed.

2.3 Conditionally exempt generators may store wastes on site in order to accumulate cost efficient shipping amounts. This short term storage is regulated. The waste must be stored in proper containers, labeled as hazardous waste with the date the storage began. Conditionally exempt generators must not accumulate more than 2,200lbs of hazardous waste at any time. It is Glacier's goal to maintain its current conditionally exempt status and further its efforts in accordance with the Environmental Management Plan (EMP).

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2.4 Small and Large quantity generators are required to maintain records of all waste generation and to submit an annual report by March 1st of each year. Records shall include the wastes generated by date, assigned EPA hazardous waste number, quantity, and date waste was removed for disposal. In addition, generators must maintain records for three years. This includes copies of manifests, annual reports, any laboratory test results, and any other applicable information. Although GNP is currently conditionally exempt and is no longer required to annually report, shipping receipts will be maintained for record keeping purposes.

3.0 Responsibilities

All GNP employees are responsible for proper hazardous waste handling and disposal. Responsibilities are derived from laws and regulations enforced by Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA) and the Montana WUTMB. Supervisors are responsible for assuring assigned employees comply with all hazardous waste requirements set forth in this program.

3.1 Section 20 of this plan lists personnel with specific responsibilities relating to this program.

3.2 Various sections of RCRA provide for many different liabilities for persons involved with hazardous waste management. These liabilities range from compliance directives to criminal penalties. Any employee who knowingly violates RCRA provisions may be held personally liable.

4.0 Waste Identification

A waste defined is any solid, liquid, or contained gaseous material that you no longer use and either recycle, throw away, or store in lieu of disposal. Some wastes pose specific threats to our health and our environment.

4.1 **Listed Wastes.** Listed waste is considered "hazardous waste" if it has been listed as such in RCRA regulations. Several publications by the EPA and 40 CFR Part 355 contain lists of hazardous wastes.

4.2 **Characteristic Wastes.** All waste that has the characteristics of being ignitable, corrosive, reactive or toxic are included as a "hazardous waste." Many products used at GNP are classified as "characteristic wastes." However, they are not treated as hazardous waste unless they are to be

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disposed. Commercial products with these characteristics are regulated by OSHA under 29 CFR 910.1200 Subpart Z as "Toxic, Hazardous Substances".

- 4.3 **Labels.** The label provided on each commercial product container contains valuable information relating to the determination of hazardous characteristics. Every effort must be made to keep each container labeled and to prevent damage and spillage which may affect readability. If the label is not present on a container, another label must be placed on it immediately. Proper labeling information can be found in GNP's Safety Program, section 4-2, Hazardous Communication Program.
- 4.4 **Material Safety Data Sheets.** MSDS's provide information on hazardous ingredients, physical characteristics, health hazards and disposal procedures. They provide a good reference in determining the product's hazardous waste status.
- 4.5 **Testing.** If there is no label present on the container and there is no knowledge of its contents, it may be necessary to perform analytical testing on the substance. Such testing will determine if the product is a hazardous waste. This is very expensive and should be performed only if the product identification cannot be made. Such test results must be maintained in the park files for a minimum of three years.
- 4.6 **Hazardous Waste Inventory.** When an unused commercial product or other substance is to be disposed of and it is classified as hazardous waste, it must be checked in to the employees controlling the hazardous waste sheds. The item will be evaluated to ensure that it is a hazardous waste. A number will then be assigned to the product, and a hazardous waste inventory form will be completed. The form must be filled out immediately without exception. These forms will be the official log or record of hazardous waste activity within the park. The hazardous waste inventory forms will be maintained in the Safety Office for a minimum of three years.
- 4.7 **Hazard Condition Report.** Known or suspected hazardous waste in GNP will be reported on the Hazard Condition Report found in section 2-4 of GNP's Safety Manual. The report is also located on the intranet under "Safety."

5.0 What is not Hazardous Waste?

Due to the expense and special efforts necessary to handle and dispose of hazardous waste, it is important to exclude items that do not meet the criteria of hazardous waste. All household wastes are excluded by EPA under CFR 40 261.4(b) (1) and Montana under title 16, Chapter 44.304 (2) (a). "Household Waste" means any waste material, including

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garbage, trash and sanitary waste in septic tanks, derived from households including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreational areas. Any such waste generated by these activities are excluded from hazardous waste status.

6.0 Hazardous Waste Handling and Control

Sine GNP is not involved in manufacturing, processing or other industrial activities that are the traditional producers of hazardous waste, and since park hazardous waste results from household waste and unused products, GNP has generated the following guidelines for control and handling of these products:

6.1 Hazardous Waste Streams. The park Safety Officer will consult with all supervisors of any activity that may produce or have the potential to produce hazardous waste. The hazardous waste produced will be identified and disposal methods will be determined. The Safety Officer will develop a Hazardous Waste Stream, and include in this program, to be used by supervisors to manage generated waste. Waste Streams previously identified can be found in sections 8 and 9 of this program.

6.2 Hazardous Waste Collection Points. There are two hazardous waste collection points. They are located at the Park Headquarters maintenance area and at the St. Mary Boneyard. These collection points consist of specially designed metal sheds manufactured to meet all requirements for temporary hazardous waste storage. The sheds have spill catchments under the floor and are specially ventilated. Since Glacier is only permitted to store hazardous waste for a specified temporary period of time, all park storage is temporary. The Carpenter Shop Foreman is designated to receive hazardous waste at the St. Mary site while the Safety Officer and the Facility Manager receive hazardous waste at the Headquarters site. The Hazardous Waste Inventory Form (Appendix B) must be completed when items are received at either site. The St. Mary site is a satellite collection site and all hazardous waste there must be taken to the Headquarters site as soon as practical. Arrangements must be made in advance to assure the individuals listed above will be available to receive the hazardous waste. In no case may the waste be left outside the hazardous waste shed or with someone not directly involved with the items to be disposed of. Non-hazardous waste shall not be stored in these sheds.

6.3 Disposal. All hazardous waste received at collection points will be disposed of at a RCRA approved site. Since there are no approved sites in Montana, a licensed commercial company must be contracted with to receive, package, transport and dispose of the waste. They will also be required to meet all requirements regarding this activity, including the paperwork and

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recordkeeping. Hazardous waste disposal contracts are very expensive.

6.4 Security. Once a hazardous waste has been logged in at the collection point, it will be secured to prevent any unauthorized or accidental contact. For this reason, hazardous waste will never be left sitting adjacent to the shed. The hazardous waste shed will remain locked at all times and only designated GNP personnel will have access. This will also assure that contact must be made with the proper personnel for the purpose of obtaining proper shipping manifests and GNP's (attached) Hazardous Waste Inventory Form. Personnel identified are the Safety Officer and the West Lakes Garage supervisor.

7.0 Selling or Declaring Surplus. Before a product is designated for disposal, all the waste minimization efforts described in Section 14 must have been made. The next step is to consider the product for selling or surplus distribution.

7.1 Declaring Surplus. Before any product is sent to the hazardous waste collection points, an attempt should be made to determine if any other activity in the park can use the product. There have been situations where a product that one operation has no use for or refuses to use, is acceptable for use by another operation. Contact potential users or put a notice in the park morning report. If no user in the park is found, the Property Management Specialist can use approved administrative procedures to advertise the availability of the product for transfer to other government units.

8.0 Recycling of Hazardous Waste. If there is an approved business that will receive the park's hazardous waste for the purpose of recycling or reclaiming, the park will utilize this option rather than contract to disposal facilities. Businesses which recycle or reclaim hazardous waste obtain the substance by buying, removal for a price, or other agreement. Recycling of hazardous waste should not be confused with other recycling activities of cans, paper, etc. Recycling of hazardous waste is subject to strict state and federal regulations which necessarily require that it be handled as a separate program at GNP.

8.1 Approved Recycling. The park Safety Officer will be responsible for determining if the recycling business is approved by state and or federal hazardous waste officials. Even when approved, if there are any concerns about the integrity of the recycling company or the environmental sensitivity of the approved method of recycling, the Superintendent's squad will discuss the situation prior to finalization of the transaction.

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8.2 Waste Amounts. Universal Wastes such as lead acid batteries, mercury lamps, thermostats, NiCad batteries and pesticides which are **recycled** are not regulated or counted as Hazardous waste. This exclusion, of these products allows GNP to minimize hazardous waste generation and maintain its Conditionally Exempt Status. This is an important reason to recycle all unused products if possible.

8.3 Inventory and Recordkeeping. Records must be kept of all hazardous waste that is recycled or reclaimed. This will include identification of the park activity or shop which generated the hazardous waste, quantity generated, date removed for recycling, and name and address of the company that picked up the product to recycle.

8.4 Hazardous Waste to be Recycled at GNP. The following hazardous wastes generated at GNP are included in a regular program of recycling:

8.4.1 Used Oils. This includes used crankcase oil, transmission fluid, brake fluid, hydraulic oil, gear and bearing oil, and compressor oil. Used oil is not currently classified as a hazardous waste unless it has been mixed with another waste classified as hazardous. Used oil will be stored in the special 500 gallon SafeWaste Oil Collection tanks located above ground at the Headquarters and St. Mary Auto Shops. GNP will pay the necessary fee to an approved used oil service to pick up and recycle the oil. GNP will not utilize companies which do road oiling for dust suppression or utilize the oil in other environmentally unsafe manners. Both the Headquarters and the St. Mary Auto Shops have arrangements to pay Emerald Recycling, PO Box 9289, Missoula, Montana 59807, to pick up used oil for refinery recycling. Their EPA ID No. is MTD982590440. The Executive Safety Committee recommended a program to allow employees living in the park to bring used crankcase oil to the park auto shops where it will be added to the used oil storage tanks. Used oil and containers will be inspected by auto shop personnel who put the oil in the SafeWaste Oil Collection tanks. This service should reduce potential for improper disposal.

8.4.2 Spent Solvents. The park auto repair shops use Stoddard Solvent, which results in a hazardous waste. The park has a contract with Safety Clean of Spokane, Washington to dispose of resulting waste. Both shops have self-contained units with dispensing and recovery tanks and filter. Safety Clean services the unit at Headquarters about once each year and removes spent solvent which is no longer suitable for shop use. The St. Mary Auto shop sends spent solvents to the Headquarters Auto shop for pick-up by Safety Clean and receives new solvent through the Headquarters Auto shop.

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8.4.3 Antifreeze. GNP uses ethylene glycol which is not a hazardous waste. Used antifreeze is poured back in radiators and used by plumbers to winterize plumbing. Excess used antifreeze is stored in a 55 gallon barrel in the Headquarters Auto shop and picked up (free of charge) by Emerald when they remove the used oils (see 8.4.1). The St. Mary Auto shop's excess used antifreeze is sent to the Headquarters Auto shop where it is stored.

8.4.4 Old Batteries. Lead acid batteries from vehicles and other activities will be received by the Headquarters Auto Mechanic Foreman and placed in a special plastic containment tub located in a closed garage. The acid will not be removed from the battery. Once each year the accumulation of batteries will be picked up by Pacific Steel/Hides/Recycling of Kalispell or Palmer Brothers Auto Supply of Columbia Falls for recycling. The St. Mary Auto shop will not store used batteries. They will take all used batteries to Headquarters to be stored with other used batteries and obtain new batteries at this time. The Headquarters Auto Shop will take personally owned batteries that park residents wish to dispose of. This will reduce the chance of any improper storage or disposal of used vehicle batteries.

9.0 Local Landfills. In the past, almost everything was dumped in local landfills. RCRA regulations now prohibit the dumping of substances classified as hazardous waste in landfills. These are the substances listed in 40 CFR 261, Subpart D. The majority of GNP's solid waste continues to be approved for landfill dumping. There are now only two landfills available for park use, the Flathead County Landfill and the Blackfeet Landfill.

9.1 Landfill Control. The Flathead County Landfill is controlled by Flathead County Office of Solid Waste and administered by Dave Prunty. The Blackfeet Landfill is controlled by the Blackfeet Tribe. Landfills are regulated by federal and state regulations which prohibit dumping of most hazardous substances according to the classifications of the landfill. The landfill manager may further restrict what is accepted by the landfill even if such disposal violates no public law.

9.2 Obtaining Landfill Permission. GNP will obtain permission or clarification from the local landfill authorities prior to hauling waste to the landfill. If you have questions concerning disposal of a particular waste in the landfill, contact the Chief of Maintenance. All questionable waste will be coordinated through the Chief of Maintenance. The Safety Officer will coordinate with the Chief of Maintenance and the local landfill managers to establish guidelines for park disposal of hazardous waste related substances, materials and containers.

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9.3 **Blackfeet Landfill.** The legal status of the Blackfeet Landfill is uncertain. The Blackfeet Landfill does not operate under a valid license from the State of Montana. The landfill continues to be operated by the Blackfeet Tribe since it is located on tribal lands and is outside the jurisdiction of the Montana Department of Environmental Quality. Utmost care will be taken in regards to the RCRA “cradle-to-grave” provisions. Any dumping which violates RCRA regulations may result in cleanup/removal responsibilities at a later date.

9.4 **Items to consider for landfill disposal:**

9.4.1 **Household Waste.** See paragraph 5.0. Household waste is excluded from hazardous waste regulation. Household waste includes any waste material, including garbage and trash derived from households including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreational areas.

9.4.2 **Empty Containers.** Hazardous waste containers which have been emptied as much as practical may be taken to landfills, if they conform to local landfill regulations. GNP seldom uses chemical which are classified as acutely hazardous, such as certain types of pesticides. Such containers must be triple rinsed prior to disposal. Consult the Safety Officer if you believe a waste product is acutely hazardous because all use and disposal will require special handling.

9.4.3 **Spent Aerosol Spray Cans.** Place in trash for regular pickup and disposal at landfill.

9.4.4 **Empty Barrels.** Empty barrels up to 110 gallons capacity may be disposed of in the landfill if they have been emptied to the extent practical, and have no more than one inch of residue remaining on the bottom of the container, or no more than three percent by weight of the total capacity remains. A Hazardous Waste Inventory form should accompany each barrel to identify past use or contents and each barrel must be labeled “Empty.” Properly recorded and labeled empty barrels for disposal will be placed behind the hazard waste sheds. Ends must be removed or holes must exist in barrels large enough to visually inspect the drum interior.

9.4.5 **Latex and Oil Base Paint.** Prior to disposal in landfills, efforts described in Section 7 will be made to declare surplus and to sell, reassign or give away paints. Latex paint is not a hazardous chemical additive. Landfills do not accept liquids; therefore, contents can be painted or poured

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onto an old sheet of plywood, cardboard or other such flat surface. Use only surface material which may normally be painted on. No plastics. When completely dried, the solid residue may be disposed of in the landfill.

9.4.6 Asbestos Brake Linings and Clutch Facings. For replaced linings and facings, the preferred disposal is to place in the box that the new linings came in and return to the dealer for disposal. Alternatively, the used parts may be containerized in a labeled container and disposed of in a sanitary landfill, with the permission of the local landfill operating authority. Rags or shop towels used during asbestos brake jobs should be containerized and disposed of with the linings.

9.4.7 Solidified Oil Products. Solidified used oil may be disposed of at a licensed Class II sanitary landfill provided it has not been mixed with any hazardous waste. Prior to disposal, the approval of the landfill's operating authority must be obtained. The Flathead County Landfill is a Class II.

9.4.8 Old Broken Asphalt. Preferred handling is to temporarily stockpile in an environmentally sound location for future road work. Alternatively it may be taken to a Class II landfill with permission from the operating authority.

9.4.9 Old Treated Timber and Bridge Planks. May be disposed of in a sanitary landfill with permission from the operating authority. The Flathead County Landfill will receive loads of treated timber and planks if each load is accompanied by a letter from the park. This letter must state the amount of material, what it was used for, what kind of treatment, age of treatment, age of planks or other treated wood, and condition. Flathead County will not issue a permit to burn treated lumber.

9.4.10 Shop Rags. It is preferable to exchange shop rags for clean rags through a service company. Otherwise, shop rags may be placed in closed containers, to prevent fire danger, until picked by the park garbage truck for disposal in the sanitary landfill.

9.4.11 Floor Sweepings and Spill Material. All such solid material may be placed in trash containers for pickup and disposal at the landfill.

9.4.12 Medical Waste. The county landfills will not accept any medical waste which has been in contact with blood. They will not accept used needles or sharps. See Section 13.5 for proper disposal of medical waste which is blood contaminated.

9.4.13 Mineral Spirit Sludge. Mineral spirit sludge may be mixed with

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sawdust, allowed to dry, and then disposed of in a landfill. Contact the Safety Officer if there is a need to dispose of mineral spirit sludge.

9.4.14 **Portable Radio Batteries.** (Nickel/Cadmium or Mercury). Small quantities of portable radio batteries may be disposed of in a Class II landfill. The key here is for each station to immediately dispose of each of the one or two radio batteries that may be replaced each year, at the time of each replacement.

9.4.15 **Asbestos.** Any suspected asbestos problem should be immediately reported to the Chief of Maintenance. Any asbestos material must be sealed in a plastic bag which is clearly marked with the required asbestos warning statement. The bags may be placed in a landfill with permission of the landfill authority. Any person (including park employees) who removes or handles asbestos must be specifically trained and licensed for this activity.

10.0 **Park Sewage Systems.** Some waste may be disposed of by flushing down the sewage system with plenty of water. This dilution is especially effective during the summer season when there is a large volume of waste water entering the system. Only those chemicals that have been judged by the Chief of Maintenance to be unharmed to the system will be listed. No record keeping is required of this method of disposal. The chemicals listed below should never be poured down a storm drain:

10.1 **Antifreeze. Antifreeze (ethylene glycol)** is not classified as a hazardous waste. Waste antifreeze may be further diluted with water and discharged to the sanitary sewer system, with prior permission from the Chief of Maintenance. Used antifreeze may be recycled by saving in a 55 gallon barrel at the Headquarters Auto Shop where it will be picked up by Emeralds when they remove the used oils. Used antifreeze may also be poured back into the radiators of park vehicles, used by plumbers to winterize park plumbing systems or recycled in the Auto Shop.

10.2 **Photo Finishing.** Process wastewater that is discharged to the sanitary sewer system where it is treated in a wastewater treatment facility is not subject to RCRA hazardous waste regulations so long as it is discharged along with domestic sewage. The very small amount of process wastewater generated by the Headquarters photo lab should be diluted with fresh water as it is flushed down the drain. If photo lab fixer solutions contain elevated levels of silver, it must be run through a silver recovery unit. Sure Way (see medical waste vendor section 13), handles this type of disposal.

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10.3 Shop Floor Drainage. Washings from floor cleaning and other activities in shops may be washed to an oil separation device prior to discharge to a sewer system. Spilled oil should be cleaned up using an absorbent material and then deposited in a closed trash can for pickup and landfill disposal.

11.0 Burning. Burning Hazardous waste **for disposal purposes** is prohibited.

11.1 Diesel Fuel. May be used as a fire starter for approved burning projects such as the Camel's Hump, construction land clearing, forest fire management and structure removal, as well as fire training activities. When such burning projects are planned, a check should be made to determine if there is any diesel available which must be disposed of for some reason.

11.2 Treated Lumber and Timbers. The Flathead County Office of Air Quality will not issue permits for burning treated or painted wood products. Consider disposal as surplus material or use of the landfill under conditions set by the landfill authority.

12.0 Disposal By Contract. Any hazardous waste which can not be disposed of by previously discussed methods must be disposed of by contract with a RCRA permitted disposal company that will transport it to an approved TSD Facility (all of which are out-of-state). Such companies must have the capability to provide shipment, approved transportation, emergency capability, and access to approved TSD sites. They must also have knowledge of all the transportation, storage and disposal regulations as well as the ability to properly complete all the paperwork required. Because of all of these requirements, such services are extremely expensive. Hazardous waste minimization, recycling and alternative approved disposal methods must be used for cost control. The list of generated waste and unused commercial products that could be classified as hazardous is almost unlimited and a definite listing is not practical for this plan. The following is a listing of the more common hazardous waste which will likely be required to be commercially disposed of by contract.

12.1 PCB Transformer. If it is unknown whether a park owned transformer contains PCB, the Maintenance Division will send a sample for testing. If the test results indicate it is a PCB contaminated waste, commercial disposal will be required.

12.2 Paint with Toxic Additives. Paint with lead, mercury or other toxic additives must be disposed of by contract. The purchase of paint with lead or mercury is prohibited by the National Park Service (NPS); therefore, such disposal is unlikely unless previously stored paint is found. All paint must be protected from freezing and should be used in its entirety rather than to allow need for

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commercial disposal.

12.3 Herbicide and Pesticides. All purchases and use of herbicides and pesticides must be cleared through the park's Integrated Pest Management Coordinator. To dispose of both items, they must be checked in at a collection point (see section 6.2) and removed by an EPA approved disposal company under a park contract. GNP will contract out all possible weed control to eliminate the need for storage and disposal.

Otherwise, only the minimum quantity possible will be purchased, only the exact amount to be used will be mixed, all of the mixed product will be applied, and rinse waters will be applied or used for the next mix. Should an old container of these products be found, it should be turned in at a GNP collection point.

12.4 Acids, Bases and other Chemicals. Containers of acids, bases or other chemicals, for which there is no known future use, should be disposed of by turned it in at a GNP collection point for disposal according to this plan.

12.5 Medical Waste. The Flathead County Landfill will not accept any waste which has been in contact with blood, including sharps (needles). All such waste must be stored in a sealed container until disposal. The Ranger Division will coordinate the collection and storage of medical wastes and sharps from the EMS and corral operations for monthly disposal. Disposal will be through an approved local disposal company. Presently the park is using SureWay System Montana, located in Deer Lodge, MT (phone – 846-2871) at a cost of \$20.00 per can. Medical waste disposal will be handled by the park's EMS Coordinator, Ranger Division.

13.0 Recordkeeping and Reporting. The Resource Conservation and Recovery Act is a program that is designed to control the management of hazardous waste from its generation to its ultimate disposal – from “cradle-to-grave.” The program requires definite recordkeeping and reporting procedures which ultimately define the credibility of the park involved. The requirements are much like the “chain of custody” procedures used to handle evidence for law enforcement cases. The following are records and reports required for hazardous waste at GNP. They are listed in the “cradle-to-grave” order:

13.1 Hazardous Waste Inventory Form (Appendix B). This form must be completed at the time a hazardous waste is received at the collection point (paragraph 6.2). This form is very important because it serves as GNP's official log or record of hazardous waste, establishes the starting date of the disposal timeframe, documents the identification and history of the waste and

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serves as the basis for other required reports. At the time the Hazardous Waste Inventory Form is completed, a number is assigned to, and affixed to the container. This form is completed by one of the designated collection officers (Safety Officer, Fire Protection Inspector or Hudson Bay Carpenter Foreman).

- 13.3 **Hazardous Waste Status Change.** Occasionally it will be determined that items of hazardous waste which have been previously checked into the receiving stations can be used by another park activity, sold, or declared surplus. In these cases the item will be removed from the storage shed and a notation made on both the Hazardous Waste Inventory Form and the Hazardous Waste Documentation Program as to the exact disposition of the item. This procedure will always be coordinated by the Safety Officer.
- 13.4 **Manifest.** When an approved disposal company picks up the park's hazardous waste from the collection point, they must provide the park with a copy of one or more manifests which cover all hazardous waste removed. The manifests will be kept until a signed copy of the manifest in question is received from the facility receiving the waste or for a period of three years.
- 13.5 **Exception Report.** Conditionally exempt generators have no requirements for exception reporting. However, if the signed copy of the manifest is not received from the receiving facility within 35 days, the park may submit an exception report to the Montana WUTMB, explaining the situation. This will ensure the waste does not get lost or forgotten and is accounted for.
- 13.6 **Test Results or Waste Analyses.** Results of any such tests made by the park, disposal company or any other source will be kept for a period of three years.
- 13.7 **Recycling.** Recycled waste does not have to be logged in on any of the above reports. It does have to be included in the annual EPA Reports. Therefore, any recycling of used oil, lead/acid batteries, antifreeze, etc. must be reported to the Safety Officer. Only the material recycled, amount, date removed and the name of the recycling company which picked it up need be provided by the supervisor of the park activity. Generally, a copy of the receipt provided by the recycling company will be adequate.
- 13.8 **Annual Reports.** Conditionally exempt generators **are not required** to report any activity.
- 14.0 **Waste Minimization.** An important part of the hazardous waste program is the minimization of the amount of hazardous waste generated for disposal. Minimization

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benefits both human and environmental safety and is very cost effective. The hazardous waste minimization program at GNP will include the following:

- 14.1 **Prohibited Products.** The procurement of some hazardous chemical products by GNP is prohibited by the Department of Interior, NPS and Inter-Mountain Region. Paint with lead or mercury additives is prohibited. Most pesticides are prohibited. Some products prohibited for use at GNP are still sold by GSA or can be procured locally if the requestor is not knowledgeable.
- 14.2 **Discontinue Activity.** Each activity that results in the generation of a hazardous waste should be evaluated to see if it really needs to be done. Consider the problems and cost of hazardous waste compared to the benefits of the activity in question.
- 14.3 **Product Substitution.** When any supervisor is ordering products that are hazardous or may result in disposal problems, attempts will be made to procure non-hazardous substitutions. MSDS and product specifications can be consulted to determine ingredients. For all requisitions for hazardous chemicals or materials, the requesting supervisor and Safety Officer will conduct a review to determine if a safer substitute can be used. (See Appendix G for substitution ideas.)
- 14.4 **Inventory Control.** When procuring hazardous products, purchase only the minimum amount to complete the job. Shift procurement of hazardous chemical products to the local market in order to purchase on an individual job basis. Avoid procurement of large supplies of products like paint because the apparent cost savings are often more than lost by improper storage loss and hazardous waste handling and disposal costs. In no case should more than a one year supply of a hazardous product be ordered.
- 14.5 **Use Completely.** At GNP, the best way to minimize hazardous waste is to completely use up all hazardous products for their intended purpose. Do not open and/or mix more product than needed. Never store a leftover partial container of a hazardous product if there is no real plan to use the product later. Repainting a section to finish up a container may be the most cost effective procedure for paint. Compromise color, and mix together partial containers for reuse.
- 14.6 **Standardization.** GNP has standardized the interior colors for all residences. This eliminates the practice of saving small amounts of paint for touch-up or remixing an unlimited number of colors for touch-up or other specific matching. At this time, any left over paint will simply be used at the next house to be painted.

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14.7 **Proper Storage Responsibility.** The supervisor is responsible for proper storage of chemical products. This is especially important for hazardous chemical products or products with disposal problems. Allowing government property to become damaged through freezing, contamination or other improper handling or storage is considered negligence on the part of the employee. The Glacier Board of Survey will review employee actions which result in the loss of government property as well as generation of waste that will be costly to dispose.

14.8 **Alternative Use.** Discuss potential uses of hazardous chemical products for which there is no known need. Other park operations may know of a proper way they can use the product.

15.0 **Emergency Response Plan.** GNP's Emergency Operations Plan covers all potential natural and man-caused emergencies. It analyzes the various risks, responsibilities and organization. There are specific detailed action plans which are referred to, including the Hazardous Materials Response Plan and the Structural Fire Plan. These two plans define all situations, preparedness, and actions for a hazardous waste emergency. Any employee assigned to duties which involve hazardous waste or hazardous materials must be familiar with these emergency plan documents.

16.0 **Training.** Park management is responsible for providing training for themselves and supervisors that manage hazardous waste programs and for employees who are exposed to or work with hazardous waste materials and sites. Key personnel can take advantage of special outside courses related to hazardous waste and then present the information gained to other employees. Generally the cost of attending outside courses will be paid for out of a park training account or the benefiting account. GNP does not have any manufacturing process or other activity which generates hazardous waste. At GNP, hazardous waste is generated from small maintenance activities. Waste for TSD disposal results from unused commercial products in their original containers.

16.1 **Emergency Response.** Employees who are members of the structural fire and emergency response teams who may be required to respond to fire, spills or other emergency involving hazardous waste must have 24 hours of hazardous materials emergency first responder training.

16.2 **Other Employees.** Employees who do not respond to emergencies but do handle storage of materials to be recycled or unused commercial products that will be checked in as hazardous waste, must attend eight hour hazardous communications training.

17.0 Medical Surveillance. Employees who have responsibilities involving handling hazardous wastes and structural fire/hazmat team members will be subject to the provisions of 29 CFR 1910.120(f) in regards to medical surveillance. Most such involved employees will also be in the park's respiratory protection program and will be required to have medical clearance for the wearing of respirators and air packs. Vaccinations are required for EMS and other employees who handle or are exposed to blood borne pathogens and certain hazardous waste. Job related vaccinations will be paid for by the benefiting account. Vaccinations requirements will follow 29 CFR Part 1910.1030.

18.0 Concessions. Concessionaires at GNP are required to have a company Safety Officer and a Safety and Occupational Health Program that meets applicable state or federal standards. The park Safety Officer will monitor and make annual evaluations of concessions programs which relate to safety and health. These evaluations will be documented and maintained in the park files for use in the overall evaluation of the concession for performance and contract compliance.

19.0 Contractors. All park contracts will have a designated contracting officer or a contracting officer's technical representative assigned to monitor all phases of the contract. Each contractor must have a Safety and Occupational Health Plan which will be reviewed by the park Safety Officer prior to starting work. The contracting officer will coordinate to assure that safety, health and hazardous waste problems are identified. Any discussion or enforcement of hazardous waste regulations will be the responsibility of the contracting officer or his technical representative. Any reporting of contractor hazardous waste or a hazardous waste problem will be channeled through the contracting officer or his technical representative.

20.0 Staff Responsibilities. Key staff members have specific and general responsibilities regarding hazardous waste management which falls within their job.

20.1 Assistant Superintendent. The Deputy Superintendent serves as the park's Operation Officer, responsible for all day-to-day activities. The Deputy Superintendent directly supervises the Division Chiefs, and through them, the entire Hazardous Waste Management Program. The Deputy Superintendent must assure that all applicable regulations which apply to hazardous waste are complied with and that funding is made available to meet mandatory disposal requirements. Safety and Occupational Health Management will be included in the performance standards of all applicable park employees and hazardous waste will be a topic during performance appraisal with those staff members listed in the following paragraphs.

20.2 Safety Officer. Serves as the park's Safety Officer and Hazardous Waste Coordinator: Develops and maintains a current Hazardous Waste Program. Serves as the park's contact on matters of hazardous

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waste with the Region, EPA, Public Health Service, OSHA and local officials and agencies; Maintains a current listing of all hazardous chemicals and materials in GNP that could potentially become hazardous waste; Maintains a system of Material Safety Data Sheets for these potentially hazardous waste materials; initiates contracting or other actions to properly dispose of hazardous waste within the legal timeframe; Maintains listing and tracking of uncorrected hazardous waste deficiencies; Advises the Superintendent and Deputy Superintendent on hazardous waste problems.

- 20.3 **Chief Ranger.** Maintains emergency response capability for hazardous waste, hazardous materials and structural fire incidents with organized teams of designated employees who meet the federal training requirements for hazardous materials response; Responsible for maintaining a current Emergency Operations Plan, Hazardous Materials Response Plan and Structural Fire Plan for GNP. Coordinates hazardous waste disposal related to the special medical waste requirements for the park's EMS Programs; Implements Hazardous Waste Management Plan within the division.
- 20.4 **Chief of Maintenance;** Implements Hazardous Waste Management Plan within the division. As GNP's main generator of hazardous waste, plays the key role in hazardous waste minimization and recycling; Prevents random dumping or discard of hazardous materials or empty containers; Coordinates the Radon Control, Asbestos Removal and Lead Abatement Programs with the park.
- 20.5 **Procurement Officer.** Requests MSDS sheets for all chemical and hazardous materials purchased; Assists requisiteness and Safety Officer in procuring safer alternatives for hazardous products; Uses inventory control to further hazardous waste minimization through purchasing and stocking the smallest quantities possible of products which may result in hazardous waste. Small quantities minimize hazardous waste generating from accidental freezing, contamination and unused surplus with no planned uses. The Administrative Officer also provides expertise on related hazardous waste disposal contracts. Develops Green purchasing guidelines to all purchase card holders
- 20.6 **Facility Managers.** All Glacier National Park branch Facility Managers coordinate the disposal of solid waste material to local landfills; maintains knowledge of what hazardous waste materials the landfills will accept and under what conditions; controls dumping of unauthorized materials in landfills; and implements waste minimization.

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20.7 **Auto Mechanic Supervisor.** The Auto Mechanic supervisor coordinates the program to allow park residents to bring used oil and batteries to the shop for recycling; initiates arrangement for approved recycling firms to take park waste and schedule such pickups as necessary. In order to meet reporting requirements with a record of recycled waste as outlined in section 13.7.

20.8 **Park Contract Representatives and the FHWA Field Liaison.** All contractors working within GNP must comply with all applicable state and federal hazardous waste requirements through their company hazardous waste program. The contract representatives will monitor handling and labeling of hazardous waste and initiate action, if necessary, to correct deficiencies. Information concerning hazardous waste will be exchanged between the park and contractors; however, the contract representative or FHWA Field Liaison will make all contacts concerning problems.

20.9 **Chairman, Board of Survey.** Under circumstances which result in the generation of hazardous waste because of improper storage or handling of unused products which originally cost \$300.00 or more, a Report of Survey action will be required.

HAZARDOUS WASTE INVENTORY FORM
GLACIER NATIONAL PARK

GENERIC NAME _____

TRADE NAME _____

MANUFACTURER ADDRESS _____

PHONE NO. _____

MSDS AVAILABLE _____ MSDS ATTACHED _____

QUANTITY _____

WHERE WAS PRODUCT USED OR STORED _____

DESCRIBE WASTE MINIMIZATION EFFORTS _____

LABEL IN PLACE AND CORRECT _____

IF UNLABELED, EMPLOYEE WHO VERIFIED THE CHEMICAL NAME IS CORRECT

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IF TESTED BY LAB, IDENTIFY CONTENTS, LAB AND DATE UNDER REMARKS.

IF EMPTY DRUM:

- a. WERE LAST CONTENTS SAME AS DRUM LABEL OR NAME ABOVE _____
- b. HAS DRUM BEEN EMPTIED AS COMPLETELY AS PRACTICAL _____
- c. IS REMAINING RESIDUE LESS THAN ONE INCH _____

SIGNATURE OF EMPLOYEE TURNING ITEM IN

DATE

RECEIVING EMPLOYEE AT PARK HQ

DATE

REMARKS:

4-4.21