



CHEMICAL STORAGE & DISPOSAL

Region 8 Sustainability & Environmental Management System

1.0 Purpose & Scope

The purpose of this procedure is to ensure a safe working environment through proper chemical containment, disposal, and spill prevention.

2.0 Activities & Departments Affected

This procedure affects all GSA personnel and contractors who oversee facility operational and maintenance contracts and anyone who uses chemicals at GSA facilities in Region 8.

3.0 Exclusions

There are no known exclusions.

4.0 Forms Used & Permits Required: (include reporting requirements)

☐ Federal and State Forms and Permits:

PERMIT / FORM / REPORT	SUBMITTED TO: FEDERAL OR STATE AGENCY	SUBMITTAL FREQUENCY
EPCRA Report	Refer to the GSA Region 8: Emergency Planning and Community Right-to-Know Act (EPCRA) Hazardous Chemical Storage Environmental Procedure for reporting requirements.	Annual
Sustainable Practices Report: Green Purchasing, Waste Management, and Chemicals Management ^(1, 2, 3)	Office of the Federal Environmental Executive (OFEE)	Region Report for Fiscal Year

(1) Reporting requirements began with fiscal year 1992, under Section 502 of the Resource Conservation and Recovery Act (RCRA), in accordance with section 6002(i) of RCRA (42 U.S.C. 6962(i)) and Section 9002 of the Farm Security and Rural Investment Act. Various Congressional Acts and Presidential Executive Orders (i.e., 13101, 13424) since the inception of the original reporting requirement have maintained this requirement; November 2, 2006, letter from the Office of Federal Procurement Policy (OFPP) and the OFEE to Federal Agency Environmental Executives and Agency Senior Procurement Officials. The last changes occurred with Instructions for Implementing EO 13423 was presented by the Council of Environmental Quality on March 28, 2007.

(2) The title of the report form changes per the requirement of the newest regulatory requirement; for example in 2008 and 2009 the report was called "E.O.13423 Sustainable Practices: Green Purchasing, Waste Management, and Chemicals Management". The three Parts include: Green Purchasing, Solid Waste Management (Reduction, Recycling, Electronics Management), and Toxic and Hazardous Chemicals Management.

(3) The report form is completed yearly by the Regional Solid Waste, Recycling Program Manager.

☐ In-house GSA Region 8 and Contractor Forms:

- Liquid chemical inventory spreadsheet
- Chemical inventory spreadsheet for non-liquid chemicals

5.0 Acronyms, Abbreviations, and Definitions



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Acronyms	Meaning
CEQ	Council of Environmental Quality
CFR	Code of Federal Regulations
CO	Contracting Officer
DFC	Denver Federal Center
COR	Contracting Officers Representative
EO	Executive Order
EPA	Environmental Protection Agency
GSA	General Service Administration
ISO	International Standards Organization
O&M	Operations and Maintenance
OFEE	Office of the Federal Environmental Executive
PBS	Public Building Services
CFR	Code of Federal Regulations
COR	Contracting Officer's Representative
DOT	Department of Transportation
EPA	Environmental Protection Agency
GSA	General Services Administration
HAZCOM	Hazard Communication
MSDS	Material Safety Data Sheet
NFPA	National Fire Protection Association
OSH	Occupational Safety and Health
OSHA	Occupational Safety and Health Agency
PPE	Personal Protective Equipment

Definitions:

Container: any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this procedure pipes or piping systems, systems for heating (i.e. boilers) and cooling (i.e. chillers) a building, engines, fuel tanks, or other operating systems in a vehicle are not considered to be containers.

Hazardous chemical: any chemical which is a physical hazard or a health hazard

Hazard warning: any words, pictures, symbols, or combination there of appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects of the chemical(s) in the container(s).

Health hazard: a chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. Health Hazard includes chemicals which are carcinogens (cancer causing), toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins (liver), nephrotoxins (kidney), agents which act on the hematopoietic (blood) system, and agents which damage the lungs, skin, eyes, or mucous membranes.



Label: any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

Material Safety Data Sheet (MSDS): is a form containing data regarding the properties of a particular substance (i.e., chemical), in accordance with paragraph (g) of 29CFR1910.1200. This document, is intended to provide workers and emergency personnel with procedures for handling or working with that substance in a safe manner, and includes information such as physical data (melting point, boiling point, flash point, etc.), toxicity, health effects, first aid, reactivity, storage, disposal, and protective equipment. (wikipedia)

Personal Protective Equipment (PPE): are safety equipment articles worn to protect the employee from accidental exposures from hazardous materials.

Physical Hazard: a chemical for which there is scientifically valid evidence that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Work area: a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

6.0 Procedure

State Specific Procedures & Requirements [refer to individual State Legal Reviews for details on Statues, Laws, and Rules]: The standardized procedures below outline the requirements.

STATE	REGULATORY AGENCIES PER STATE
Colorado	Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division ,
Montana	Montana Department of Environmental Quality, Waste & Underground Tank Management Bureau ,
North Dakota	North Dakota Department of Health, Hazardous Waste Program ,
South Dakota	South Dakota Department of Environment and Natural Resources, Waste Management Program ,
Utah	Utah Department of Environmental Quality, Division of Solid and Hazardous Waste ,
Wyoming	Wyoming Department of Environmental Quality, Solid and Hazardous Waste Division ,

Standardized Procedure:

6.0 Comply with all federal regulations and where applicable state regulations and local ordinances; fire department, the State Emergency Response Commission (SERC) or Local Emergency Planning Committees (LEPCs). Where required obtain permits and comply with reporting requirements.

6.1 The Contractor shall develop, implement, and maintain a written hazard



communication program (WHCP) at each workplace. The WHCP will at least describe how the criteria for labels and other forms of warning, material safety data sheets, and employee information and training will be met. The following must be contained in the written program:

- Name of GSA activity
- Address of GSA activity
- Inventory of hazardous materials
- Normal storage location of hazardous materials
- Copy of the Material Safety Data Sheet (MSDS) for each hazardous material
- Training criteria for contract employees who use, store, or otherwise handle hazardous materials
- A statement requiring each container of hazardous material shall be labeled or marked with the following information
 - Identity of the hazardous material
 - Appropriate hazard warning
 - Name and address of the manufacturer, or other responsible party
- Signature of responsible Contract supervisor
- Signature of responsible GSA official (e.g. property manager, COR, buildings management tech, etc.)

6.2 Contractors will manage chemical storage and disposal as follows:

- Maintain an inventory of hazardous materials used, stored or otherwise handled during normal work activities
- Obtain and maintain a copy of the applicable MSDS's for each hazardous material used, stored or otherwise handled during normal work activities
- Maintain a binder or other acceptable holder for the written plan, inventory and MSDS's
- Provide the Property Manager a copy of the hazardous materials inventory, at least annually and more often if current supplies are exhausted or deleted from the inventory, or new materials are added
- Train contract employees for handling hazardous materials
- Ensure all chemical storage containers are labeled properly
- Ensure employees who are required to handle chemicals have the appropriate Personal Protective Equipment (PPE). Ensure that goggles and/or face shields, gloves, spill aprons, etc. are provided and that the employees are trained in the proper use and care of the protective equipment. Also ensure employees are properly using the PPE, for example when transferring chemicals from larger to smaller containers.
- Ensure that liquid chemicals in amounts of five gallons or greater that are used for cleaning, maintenance, pest control, and snow removal will have secondary containment.
- Ensure that smaller containers are stored in appropriate storage cabinets. The chemicals will be stored in such a way that if there is a spill, the different chemicals do not mix and cause fire, explosion, or an eruption of



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toxic gas. The types of cabinets used will meet the requirements of the National Fire Code.

- Store and dispose of waste chemicals (chemicals that no longer have a use in the facility or in the work process and cannot be transferred, sold or recycled are considered waste). Contact the Environmental Project Group (EPG) for instructions.
 - At the Denver Federal Center (DFC) waste chemicals are to be transferred to Building 11 for storage until disposal.

6.3 The Property Manager will:

- Review the WHCP for each activity where hazardous materials are present
- Ensure that the criteria established in the WHCP are met throughout the life cycle of the hazardous material
- Maintain a file of chemical and hazardous materials inventories.
- Ensure that GSA associates and contract employees are trained prior to working with hazardous materials

6.4 The Quality Assurance Inspector conducts inspections of chemical storage areas and will submit the results to the appropriate Contracting Officer's Representative (COR).

6.5 The COR will identify issues requiring corrective or preventive action to the Property Manager, who will ensure that the action is implemented.

6.6 Spills will be cleaned up using an appropriate method and disposed of in approved containers. Refer to the **Spill Response** procedure for details.

7.0 Records Management

- Liquid Chemical Inventory spreadsheet
- Non-Liquid Chemical Inventory spreadsheet
- MSDS
- Training Records
- Disposal manifests

8.0 References

- 29 CFR 1910.106, Occupational Safety and Health Standards, Department of Labor, Subpart H Hazardous Materials, Flammable and combustible liquids; revised as of July 1, 2004
- 29 CFR 1910.1200, Occupational Safety and Health Standards, Department of Labor, Hazard Communication
- Council of Environmental Quality, Instructions for Implementing Executive Order 13423, "Strengthening Federal Environmental, Energy, and Transportation



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Management”, March 28, 2007

- Denett, Paul A., Administrator, Office of Federal Procurement Policy, and Edwin Piñero, Federal Environmental Executive, Office of the Federal Environmental Executive, Letter: FY 2006 Reporting on Implementation of the Resource Conservation and Recovery Act, Section 6002, the Farm Security and Rural Investment Act, Section 9002, and Other Environmental Purchasing Requirements, November 2, 2006
- Executive Order 13423: "Strengthening Federal Environmental, Energy, and Transportation Management", signed by President George W. Bush on 24 January 2007.
- Executive Order 13514: "Federal Leadership in Environmental, Energy, and Economic Performance", signed by President Barack Obama on 5 October 2009.
- GSA OSH Compendium
- National Fire Protection Association (NFPA) 30: Flammable and Combustible Liquids Code, 2008 Edition
- U.S. Environmental Protection Agency [Administering Agency], Resource Conservation and Recovery Act (RCRA) of 1976; 42 U.S.C. § 6901 et seq, as amended by the Federal Facility Compliance Act. [Statute]; 40 CFR 148, 239- 282 {283-299 revised} [Regulation]; Section 6002 of RCRA (42 USC 6962)

9.0 Appendices

Attachment A: Chemical Storage and Disposal Flowchart

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Revision Date	Nature of Revision	Revision made by:
12/19/2005	Working Draft	Mike Gasser, Marion Buntyn
03/16/2006	Original Release	Mike Gasser, Robert Melvin
01/29/2010	Add ISO 14001 Document Controls, add state regulations, add Flowchart (by Erik Petrovskis).	Robert Melvin
06/04/2010	Outline Region 8 requirements, and update to address new federal regulations.	Robert Melvin
05/14/2012	Emphasize Roles and Responsibilities in section 6, update flowchart (06/21/2012)	Mike Gasser, Nick Gutschow

ATTACHMENT A: Chemical Storage and Disposal Flowchart

