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Identify functional roles/titles which have input into the process or are recipients of the output of this process for awareness.		
Operations	Supply Chain	Facilities

Environmental Protection and Management Plan

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1.0 PURPOSE

This Environmental Protection and Management Plan is a comprehensive guide to environmental guidance, procedures, and responsibilities that provides direction for the development of environmental documentation and activities. It outlines the responsibilities and lays out general procedures for the proper management of environmental impacts related to program operations, including water conservation, pollution prevention, resource conservation and protection, solid and hazardous waste management, and hazardous materials management. Additionally, the plan includes essential information on spill prevention and response, sustainable procurement in line with the V2X strategy, and an environmental risk identification tool to ensure the implementation of best practices and compliance with relevant regulations and standards for an Environmental, Health, and Safety (EHS) management system. This document aligns with the *4.7.0 ENVIRONMENTAL, HEALTH, AND SAFETY MANAGEMENT SYSTEM (EHSMS) PROGRAM* and provides:

- Consistency and standardization
- A streamlined deployment process
- A seamless link between strategy and implementation
- Tools to foster a culture of accountability
- A bridge between business operations, personnel, and the environment.

This plan aims to establish best practices for the environmental impacts related to the contract activities that V2X has control over and can be identified using the *4.7.0-3 Environmental Aspects and Impacts Worksheet*. The objective of the plan is to provide sufficient administrative direction to minimize pollution, accidental releases to the environment, and practices that may lead to environmental harm. Further guidance on applicable standards and regulations may need to be consulted as required. The goals of this plan are to ensure compliance with regulatory requirements, streamline administrative procedures, and reduce environmental impact through effective environmental management practices. Finally, this document will serve as a tool for the management of environmental risks identified at a location level, which are documented in the V2X Environmental Aspects and Impacts Risk Matrix.

Every program with identified environmental aspects and impacts will deliver program-level procedures and work instructions that may align with the governance principles outlined by this document. This Plan will be used to establish guidance and policy that must be followed at the program level. EHS HQ will monitor risk and compliance and audit selected programs for compliance and best practices following the EHS risk-based approach.

Figure 1. Elements of the V2X Environmental Management Program

2.0 APPLICABILITY

This document applies to all V2X personnel engaged in any duties that entail environmental impacts in support of V2X operations and activities. Each V2X employee and subcontractor has a crucial role in implementing and following this plan to preserve the environment and adhere to established procedures and best practices in all functional areas.

3.0 ROLES & RESPONSIBILITIES

- Program Manager
  - Has overall responsibility and provides resources to support the program.
  - Has responsibility for the implementation and compliance of the environmental program as outlined in the statement of work.
  - Ensures the procedures laid in this document are followed and implemented, and they align with the Project Work Statement (PWS).
  - Supports and emphasizes the practices of waste reduction, loss identification, sustainable use of natural resources, and environmental protection.
  - Serves as the Point of Contact (POC) for all environmental and safety issues related to the Project Work Statement (PWS).
  - Makes all necessary training available to support contract activities. Ensures that all required training is approved, resourced, accomplished, and documented.
  - Ensures compliance with all applicable regulations and standards related to the environmental aspects and impacts of the contract's activities.

- Managers/Supervisors
  - Ensure the training of personnel is adequate for their assigned duties and responsibilities.
  - Ensure employees and subcontractors are trained regarding the different aspects of this Plan.

- Employees
  - Ensure their safety in their respective work areas throughout daily activities.
  - All personnel are responsible for being alert to unsafe workplace acts or conditions and for reporting them to their supervisor for immediate corrective actions and analysis.
  - Follow the stop-work protocol whenever a hazard/unsafe condition/risk is identified, and ensure the risk is eliminated or controlled appropriately before resuming their duties.
  - Commit to the implementation of best practices to protect the environment from unnecessary pollution.

4.0 REFERENCE DOCUMENT(S)

- *4.7 EHS Policy, Principles & Practices*
- *4.7.0 Environmental, Health, and Safety Management System (EHSMS) Program*
- *4.7.0-3 Environmental Aspects and Impacts Identification Worksheet*
- *4.7.6 Incident Reporting and Investigation Program*
- *4.7.7 Industrial Hygiene and Occupational Health Program*
- *4.7.42 Water Conservation Plan*

- *CENTERS FOR DISEASE CONTROL AND PREVENTION (CDC), ENVIRONMENTAL INFECTION CONTROL GUIDELINES*
- *DOD INSTRUCTION 4105.72, PROCUREMENT OF SUSTAINABLE GOODS AND SERVICES*
- *DOD INSTRUCTION 6055.01, SAFETY AND OCCUPATIONAL HEALTH (SOH) PROGRAM*
- *DOD INSTRUCTION 6055.05-M, OCCUPATIONAL MEDICAL EXAMINATIONS, AND SURVEILLANCE MANUAL*
- *DOD MANUAL 4715.05-VOL 1-5, OVERSEAS ENVIRONMENTAL BASELINE GUIDANCE DOCUMENT*
- *THE CLEAN WATER ACT (CWA)*
- *THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA), SECTION 102(A) HAZARDOUS SUBSTANCES*
- *THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)*
- *U.S. CODE OF FEDERAL REGULATIONS (CFR). TITLE 29, PART 1910: OCCUPATIONAL SAFETY AND HEALTH STANDARDS*
- *U.S. CODE OF FEDERAL REGULATIONS (CFR). TITLE 40: PROTECTION OF ENVIRONMENT*
- *U.S. DEPARTMENT OF TRANSPORTATION, EMERGENCY RESPONSE GUIDEBOOK*
- *U.S. DOL, OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION, HAZARD COMMUNICATION*
- *U.S. EPA, BEST PRACTICES FOR SOLID WASTE MANAGEMENT*
- *U.S. EPA, COMPREHENSIVE PROCUREMENT GUIDELINE (CPG) PROGRAM*
- *U.S. EPA, ENVIRONMENTALLY PREFERABLE PURCHASING (EPP) PROGRAM*
- *U.S. EPA, GUIDE FOR INFECTIOUS WASTE MANAGEMENT*
- *U.S. EPA, INTRODUCTION TO HAZARDOUS WASTE IDENTIFICATION (40 CFR PARTS 261)*
- *U.S. EPA, INTRODUCTION TO INTEGRATED PEST MANAGEMENT*
- *U.S. EPA, NATIONAL PRIMARY DRINKING WATER REGULATIONS*
- *U.S. EPA, SAFER CHOICE STANDARD AND CRITERIA*
- *U.S. EPA, SIGNIFICANT NEW ALTERNATIVES POLICY (SNAP) PROGRAM*
- *U.S. EPA, SMARTWAY PROGRAM*
- *USDA, BIOPREFERRED® PROGRAM*
- *WORLD HEALTH ORGANIZATION (WHO), GUIDELINES FOR DRINKING-WATER QUALITY*

5.0 DEFINITIONS

- **Abatement:** A set of measures/activities designed to permanently eliminate or reduce hazards caused by a specific hazardous substance. Individuals who perform abatement should be certified and follow specific work practices.
- **Accident:** Undesired event, giving rise to death, ill-health, injury, damage, or other loss.
- **Alternative Fuels**: Alternative fuels include gaseous fuels such as hydrogen, natural gas, and propane; alcohols such as ethanol, methanol, and butanol; vegetable and waste-derived oils; and electricity. These fuels may be used in a dedicated system that burns a single fuel, or in a mixed system with other fuels including traditional gasoline or diesel, such as in hybrid-electric or flexible-fuel vehicles.
- **Asbestos-Containing Materials (ACM):** Commercial asbestos products containing more than 1% asbestos by weight.
- **Aquatic:** Habitats and ecosystems that exist in bodies of water; refers to both marine and freshwater environments.
- **Biobased Products:** A biobased product composed, in whole or in significant part, of biological products, including renewable domestic agricultural materials, renewable chemicals, and forestry materials; or an intermediate ingredient or feedstock. Biobased Products are derived

from raw materials such as plants and other renewable agricultural, marine, and forestry materials.

- **Biodegradation:** Breakdown of organic matter by microorganisms. Biodegrading of a material modifies its mechanical, physical, and chemical properties.
- **Biohazard:** A biological hazard. A biological substance that poses a threat to the health of living organisms. Biohazards include microorganisms, viruses, and toxins. Regulated medical waste is classified as biohazardous.
- **Cesspool:** Also known as a cesspit. A dry well that receives untreated sanitary waste. The use of cesspools is discouraged, and they are forbidden in several countries.
- **Coliform bacteria:** Coliforms are bacteria that are always present in the digestive tracts of animals, including humans, and are found in their wastes. They can also be found in plant and soil materials. Total coliform counts give a general indication of the sanitary condition of a water supply. Fecal coliforms are the group of total coliforms that are present specifically in the gut and feces of warm-blooded animals. Escherichia coli (E. coli) is the major species in the fecal coliform group. Identifying the presence of E. coli is an important water quality parameter since some strains of E. coli can cause serious illness.
- **Compliance:** Conformance to a rule, policy, standard, or regulation.
- **Composting:** Composting is the process of decomposing organic materials into simpler organic and inorganic compounds. This process recycles various organic materials otherwise regarded as waste products. Good compost is rich in plant nutrients and beneficial organisms.
- **Continual Improvement:** The ongoing improvement of products, services, or processes through incremental and breakthrough improvements, consistent with our EHS Policy.
- **Corrective Action:** Any action that eliminates the causes of nonconformities to prevent a recurrence.
- **Corrective Action Plan (CAP):** A step-by-step plan with concrete actions to correct an issue, problem, or non-compliance to improve performance and reduce risk.
- **Disinfection (Water):** Water disinfection removes, deactivates, or kills pathogens. Disinfection can be achieved by means of physical or chemical disinfectants.
- **Disinfection Residuals:** Public drinking water systems require residual disinfectants to be maintained throughout the water distribution system. They can be measured as total chlorine, free chlorine, combined chlorine, or chlorine dioxide.
- **Drinking Water:** See Potable Water.
- **Ecosystem:** The interrelationships between all the living things in an area.
- **Environment:** Surroundings or conditions in which V2X and the programs operate, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
- **Environmentally Preferable Product:** Products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose.
- **Environmental Aspect**: Element of V2X activities or services that interacts or can interact with the environment.
- **Environmental Condition**: State or characteristic of the environment as determined at a certain point in time.
- **Environmental Management System:** An Environmental Management System (EMS) is a set of processes and practices that enable an organization to reduce its environmental impacts, continually improve overall environmental performance, and increase its operating efficiency. EMS implementation reflects accepted quality management principles based on the "*Plan, Do, Check, Act*" model found in the ISO 14001 International Standard and uses a standard

process to identify and prioritize current activities, establish goals, implement plans to meet the goals, evaluate progress, and make improvements to ensure continual improvement.

- **Environmental Policy:** Intentions and direction of the organization related to environmental performance.
- **Environmental Programs:** Environmental programs help buyers identify products and services with positive environmental attributes. Many federal environmental programs, such as ENERGY STAR and BioPreferred, are mandatory for federal buyers and programs that procure goods and services for federal contracts.
- **Findings:** Findings are based on evidence about how a program's operations measure up against the assessment criteria. Findings can show either conformity or nonconformity to the assessment criteria. In cases where the program is operating appropriately, the finding is that it conforms to the standards set out in the criteria used to evaluate it. However, if the processes and procedures are not adequate or appropriate, the finding will be that the bank or some of its functions are non-conforming.
- **Food Waste:** Organic residues generated from handling, storage, sale, preparation, cooking, and serving of foods. Food waste includes unused produce from pre-consumption sources (e.g., markets and restaurants) and food left over after consumption. Food loss includes unused products from the agricultural sector (e.g., unharvested crops).
- **Friable Asbestos:** Friable asbestos is asbestos that can easily break down, and as result, it will be released into the air as inhalable asbestos fibers. Friable asbestos contains more than 1% asbestos by weight.
- **Greywater:** Gently used water from bathroom sinks, showers, tubs, and washing machines. It has not been in contact with feces.
- **Groundwater (GW):** Water contained within the earth's subsurface. It is recharged from the surface, and it is more vulnerable than surface water as pollution in the GW is less visible and more difficult to clean up.
- **Hazard:** Article, substance, or situation that has the potential to cause harm or damage to human health, the environment, property, or a combination of these.
- **Hazard Identification:** Hazard identification is part of the process used to evaluate if any situation, item, thing, etc. may have the potential to cause harm. The term often used to describe the full process is risk assessment.
- **Hazardous Chemical Warning Label:** A label, tag, or marking on a container that provides the name of the hazardous chemicals, the hazard class (e.g., acute toxicity/lethality, skin irritation/corrosion, etc.), the relative severity of the hazard, precautionary statements, the manufacturer/importer information, and a signal word. The GHS includes two signal words: "Warning" for less severe hazard categories, and "Danger" for more severe hazard categories.
- **Hazardous Materials:** Any material (biological, chemical, or radiological) that can pose an unreasonable risk to health, safety, or the environment by itself or through interaction with other factors if improperly handled, stored, issued, transported, labeled, or disposed of because it is a carcinogen, corrosive, an irritant, a sensitizer, toxic, can damage the skin, eyes, or internal organs. Physical hazards include combustible liquids, compressed gases, explosives, flammable materials, organic peroxides, oxidizers, pyrophoric materials, unstable (reactive) materials, and water-reactive materials.
- **Hazardous Waste Accumulation Point (HWAP):** A hazardous waste accumulation point is a location on-site at which hazardous waste can be accumulated for up to 90 days without a permit. These satellite accumulation points must be located at or near the point of waste generation.

- **Hazardous Waste Profile Sheet (HWPS):** A hazardous waste profile sheet is a form that includes information about a waste stream and its generator. It requires the name of the waste being generated, its characteristics and properties, volume and shipping information, and supporting documentation for the generator classification.
- **Hazardous Waste Storage Area (HWSA):** The area where a facility stores its waste before being sent off-site for treatment, disposal, or recycling.
- **Hydrocarbons:** A large class of organic compounds containing only carbon and hydrogen; common in petroleum products and other oils.
- **Incident:** Event that gave rise to an accident or had the potential to lead to an accident. An incident where no ill health, injury, damage, or other loss occurs is also referred to as a "near-miss". The term incident includes near-misses.
- **Infectious Medical Waste:** Solid waste produced by medical and dental treatment facilities that is specially managed because it has the potential for causing disease in humans and may pose a risk to both individuals and community health if not managed properly. For a waste to be infectious, it must contain pathogens with sufficient virulence and quantity so that exposure to the waste could result in infectious disease. Infectious medical waste includes microbiology waste, pathology waste, human blood, and blood products, body fluids of any kind, sharps, syringes, and needles, any discarded materials contaminated with blood, contaminated animal carcasses, and body parts. Microbiologic wastes pose the greatest health risk, whereas sharps pose the greatest risk for injuries.
- **Infectious Hazardous Waste:** Mixtures of infectious medical waste and hazardous waste including solid waste such as fluids from a parasitology laboratory.
- **Inspection:** An inspection is, most generally, an organized examination or formal evaluation exercise. Inspections include activities such as measuring, examining, testing or gauging one or more characteristics of a product or service and comparing these with specified requirements to determine conformity. Program inspections are ESH evaluations of the performance of the program processes and procedures against predetermined standards.
- **Integrated Pest Management (IPM):** A planned program comprised of pest identification, monitoring pests and damage caused, guidelines for when management action is necessary, prevention of pest problems, using management tools, and assessing the effectiveness of the pest management efforts.
- **Internal Audit:** Internal auditing is an independent, objective assurance and consulting activity designed to add value to and improve V2X operations. It is a documented process for obtaining valid evidence and evaluating it objectively to determine the extent to which the ESHMS objectives and goals are fulfilled.
- **Lead-Based Paint (LBP):** Paint or other surface coatings that contain lead equal to or exceeding 1.0 milligrams per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight.
- **National Pollutant Discharge Elimination System (NPDES)**: The NPDES permit program, created in 1972 by the *Clean Water Act (CWA),* helps address water pollution by regulating point sources that discharge pollutants to the waters of the United States.
- **Near Miss:** Event or circumstance that has the potential to cause, but does not result in human injury, environmental releases, property or vehicle damage, or an interruption to normal operations. A near miss, or a good catch, is an opportunity to improve ESH procedures in the workplace based on a condition with the potential for serious consequences. A faulty process

or management system should be the focus of improvement. Examples of near misses include an employee slipping but not falling, or poorly maintained equipment sparking near flammable materials.

- **Nonconformity**: Also, non-compliance. A nonconformity is a deviation from a specification, a standard, or an expectation. Nonconformities can be critical, major, or minor.
- **Noninfectious Medical Waste**: Noninfectious medical waste is any waste that does not require special management because it cannot cause disease in humans, or it has been treated to render it noninfectious by reducing the microbial load.
- **Performance**: Measurable results of the Environmental, Safety, and Health Management System, related to the control of ESH risks, based on ESH policies and objectives.
- **Pesticide:** Any substance or mixture of substances, including biological control agents, that may prevent, destroy, repel, or mitigate pests.
- **Pests:** Populations of living organisms that adversely affect the well-being of humans or animals; attack real property, supplies, equipment, or vegetation, or are otherwise undesirable. Pests include, but are not limited to arthropods, birds, rodents, nematodes, fungi, snails, snakes, and weeds.
- **POL:** Refined petroleum, oils, and lubricants, including, but not limited to, petroleum, fuel, lubricant oils, synthetic oils, mineral oils, animal fats, vegetable oil, sludge, and POL mixed with wastes other than dredged spoil.
- **Pollutant**: A substance that, when introduced into the environment, adversely affects a resource. Pollutants include a wide range of substances found in solid waste, processes residue, sewage, trash, sludge, chemical waste, biowaste, radioactive material, dirt, agricultural waste, etc.
- **Polychlorinated Biphenyls (PCBs)**: Organic chlorine compounds that are manmade. PCBs are very stable mixtures that are resistant to extreme temperatures and pressure. PCBs were used widely in electrical equipment like capacitors and transformers. PCBs are environmentally toxic and are classified as persistent organic pollutants.
- **Pollution Prevention (P2)**: Pollution prevention (P2) is any practice, process, or technique that reduces, eliminates, or prevents pollution at its source.
- **Potable Water:** Water that comes from surface or ground sources and has been treated to meet the state, federal, and local standards for consumption and has been approved as potable by the appropriate authorities.
- **Preventive or Preventative Action**: Any action that eliminates the causes of potential nonconformities to prevent their occurrence.
- **Procedure**: A specified way to carry out an activity or process.
- **Recovered Content**: Waste materials and by-products recovered or diverted from solid waste, excluding those materials and by-products generated from, and commonly reused within, an original manufacturing process.
- **Recycling**: Recycling is the process of collecting and processing materials that would otherwise be thrown away as trash for use in the form of feed materials in the manufacture of new products.
- **Registered Pesticide**: A pesticide registered and approved for sale and use within the United States or the Host Nation.

- **Reportable Spill**: A release of a reportable quantity ("RQ") of oil or a hazardous substance into the environment. For information on reportable quantities visit Reportable Quantities (RQs) for *CERCLA Section 102(a) Hazardous Substances*.
- **Risk**: Likelihood or probability of harm.
- **Risk Assessment**: The overall process of hazard identification, risk analysis, and risk evaluation.
- **Root Cause Analysis:** An approach, tool, or technique used to reveal the real cause of a problem. A root cause analysis is a useful investigative tool that will help prevent similar events from reoccurring by dealing with the real causal factors of an incident rather than just the consequences. The *Occupational Safety and Health Administration (OSHA)* and the *Environmental Protection Agency (EPA)* recommend employers conduct root cause analyses following incidents or near misses.
- **Safe**: Freedom from unacceptable risk of harm.
- **Safety Data Sheet (SDS):** A Safety Data Sheet is a document produced in alignment with the UN's Globally Harmonized System of Classification and Labelling of Chemicals (GHS) that the manufacturer, importer, or distributor of a chemical product is required to provide to downstream users. The purpose of an SDS is to ensure that anyone who handles chemicals has the hazard information needed to safely use, handle and store them. A specific 16 section format is used. Sections 1 through 8 of the SDS contain the more critical information to have during times of emergency, including manufacturer and emergency response contact information, hazard details, chemical composition, safe handling practices, and emergency control measures such as firefighting. Sections 9 through 11 and 16 contain other technical information, including physical and chemical properties, stability and reactivity information, and exposure control information. Sections 12 through 15 contain information on environmental impacts, disposal considerations, transport information, and regulatory information.
- **Spill:** The accidental but unpermitted discharge or release of petroleum, oil, or lubricants, or hazardous/regulated substances.
- **Standard Operation Procedure (SOP):** A document that specifies or describes how an activity is to be performed. It may include methods to be used, equipment to be used, and sequence of operations.
- **Stormwater:** Run-off and drainage from wet weather such as rain, snow, ice, sleet, or hail.
- **Subcontractor:** Any individual or organization that furnishes materials, products, or services.
- **Sustainability:** Creating and maintaining conditions where humans and nature can exist in productive harmony that fulfills the social, economic, and other requirements of present and future generations.
- **Sustainable Procurement:** The adoption of corporate social and environmental responsibility principles into the procurement processes while at the same time ensuring they meet the quality requirements and criteria established by the company and the customer.
- **United Nations' Globally Harmonized System of Classification and Labelling of Chemicals (GHS)**: GHS defines and classifies the hazards of chemical products and communicates health and safety information on labels and safety data sheets (SDS). The goal is that the same set of rules for classifying hazards, and the same format and content for labels and safety data sheets (SDS) will be adopted and used around the world. GHS covers all hazardous chemicals and

may be adopted to cover chemicals in the workplace, transport, consumer products, pesticides, and pharmaceuticals.

- **Waste Stream**: The resulting waste from a task or process. Waste streams can be recurring or one-time waste streams. A new process or activity may require a determination of whether a waste stream will be generated and if a Hazardous Waste Accumulation Point (HWAP) will be required.
- **Wastewater or black water**: Wastewater comes from toilets and likely contains pathogens. It can be separated from greywater for treatment and recycling purposes of the latter.
- **Weir**: An underwater structure that controls the flow of water.

6.0 PROCEDURE

V2X may be responsible for managing aspects of several environmental programs, or have environmental risks associated with activities and operations. To safeguard the environment and ensure the safety of employees, subcontractors, and customers, it is essential to adhere to all relevant environmental standards and best practices.

6.1 Environmental Aspects and Impacts Identification and Assessment

6.1.1 Correctly identifying environmental aspects and impacts of daily operations is crucial in managing environmental risks and achieving sustainability goals. It allows V2X and the program to understand the potential environmental effects of our activities and services and develop effective strategies to reduce or eliminate them.

6.1.2 By identifying environmental aspects and impacts, the programs can prioritize their efforts to reduce their environmental footprint and comply with environmental regulations. This process can help V2X minimize waste generation, reduce energy consumption, decrease greenhouse gas emissions, and conserve natural resources.

6.1.3 Additionally, identifying environmental aspects and impacts helps us address the expectations of stakeholders, including customers, employees, regulators, and communities, as it demonstrates that we are aware of our impact on the environment, and we are committed to mitigating any negative effects.

6.1.4 Programs must ensure that environmental risks are adequately addressed. Environmental risks can result in significant financial losses, damage to V2X reputation, legal liabilities, and negative impacts on the environment and public health. By addressing environmental risks, we mitigate the likelihood of environmental incidents.

6.1.5 Resources: EHS HQ has implemented the following resources to ensure programs identify and mitigate environmental aspects and impacts:

- *4.7.0-3 Environmental Aspects & Impacts Worksheet.* This worksheet ranks environmental aspects based on the scope of the activities the programs are responsible for, and the likelihood and severity of environmental impacts associated with them. The worksheet should be updated whenever new programs are implemented, or operations change.
- *Environmental Aspects and Impacts Risk Matrix by Program (within the EHS Department SharePoint).* This matrix helps EHS HQ get a quick snapshot of environmental aspects and impacts at the program level and understand the overall level of risk for all the programs.
- *Regulatory Compliance Tracker.* This matrix helps EHS HQ get a quick snapshot of environmental regulatory requirements that each program has, and keep track of any regulatory issues, findings, or violations.

- *Annual Self-Assessment Audit*. Used to ensure that the program is following best practices in applicable areas of their operations.

6.2 Historic and Cultural Resources

6.2.1 V2X and its employees may encounter historic and cultural resources while conducting operations at various locations. These resources refer to any remnants of past human activities. To ensure the protection of these valuable assets, it is important to follow the following guidelines:

6.2.2 Awareness: Employees should be knowledgeable about the location of these resources and have access to an inventory.

6.2.3 Protection: Measures must be taken to preserve these resources and minimize any potential harm. Before beginning work activities that could impact these resources, a project plan must be created to identify their location and potential effects. A risk assessment must then be performed to determine the level of impact and implement mitigation measures, such as limiting the scope of work or ensuring repair or restoration if necessary.

6.2.4 Prohibited Actions: No employee is permitted to disturb, damage, or alter any historic or cultural property without proper authorization.

6.2.5 Discovery: In the event of discovering historical property or human remains, all work in the area must stop immediately, and management and local police must be notified.

6.2.6 Reporting: Any violations of these provisions should be reported to the employee's supervisor, EHS representative, or Program Manager.

6.3 Natural Resources and Endangered Species

6.3.1 Employees may encounter protected natural resources and endangered species in certain areas. It is important to implement conservation measures to protect these species and their habitats. The following guidelines apply to locations where protected natural resources and endangered species have been identified.

6.3.2 When operating in areas where biodiversity may be impacted, it is important to conserve and protect the local ecosystems and its species.

6.3.3 Existing plant life should be preserved, and habitats of endangered species should be protected and maintained to promote the survival of indigenous species.

6.3.4 To prevent erosion, employees should stay on established roads and trails unless a task requires otherwise. In such cases, a mitigation strategy may be necessary, and it will be brought up to the attention of the program manager and contracting officer.

6.3.5 No plant life should be dug up, cut down, exterminated, or impacted by V2X employees unless directed by the Program Manager for a specific reason. Any weed problems should be reported to the appropriate personnel for control and management.

6.3.6 Wild animals should not be handled, fed, killed, or captured by employees. Any animal-related issues, such as infestations or injured/ill animals, should be reported to the appropriate personnel. To prevent animal infestations, food waste should be properly and promptly disposed of in a closed container.

6.3.7 Any V2X employee observing a violation of these provisions should report it to their supervisor, EHS representative, or Program Manager.

6.4 Air Emissions

6.4.1 When operating equipment that generates significant emissions, it is crucial to comply with all air emission permits and follow best practices. These permits ensure that emissions do not exceed the regulated limits and do not cause harm to human health

and the environment. To ensure compliance, regular monitoring and reporting of emissions is necessary. Additionally, regular maintenance of the equipment, use of proper fuel and best operating practices can significantly reduce emissions.

6.4.2 Where feasible, control technologies such as filtration systems, catalyst converters, and other emissions reduction technologies can also be helpful in reducing air emissions.

6.4.3 All equipment that generates air pollutants must be operated and maintained in accordance with the manufacturer's specifications, including preventive maintenance inspections. Equipment must meet emission limits determined by applicable regulations (Host country, FGS, local, state, or Federal). Failure to meet emission standards needs to be addressed immediately, and the equipment must be repaired or replaced.

6.4.4 Emission sources that require testing and monitoring should have sampling and testing facilities to determine the nature and quality of the emissions that are discharged as a result of operations.

6.4.5 Where contractual requirements involve records related to compliance with emission standards, these should be retained in accordance with the PWS and provided upon request. Manufacturer specifications, emissions test data, and inspections/maintenance logs should also be retained.

6.4.6 Employees and subcontractors involved in air emissions control should be trained consistently with their responsibilities. Training courses may include Environmental concerns about air emissions, combustion principles, equipment operation, pollution monitoring methods, corrective actions, applicable regulations, etc.

6.4.7 Ozone-Depleting Substances Management

- Labeling: All containers or products containing a Class I or Class II ozone-depleting substance must bear a warning statement, in English and the predominant language of the HN (where applicable). The label should have the name of the substance, and a warning that stated that such substance harms public health and the environment by destroying ozone in the upper atmosphere. The label must be legible and conspicuous and not interfere with, detract from, or obscure any labeling information required to be on the equipment or container.
- Training: Only a technician properly trained and certified in refrigeration/ halon-containing equipment servicing will perform repairs, maintenance, or recovery of CFC/HCFC from sealed refrigeration systems and appliances. Technicians should also be trained in proper recovery and recycling procedures. All repairs, including leak repairs or services to appliances, industrial process refrigeration units, air-conditioning units, or motor vehicle air conditioners containing ODS refrigerants, must be performed using commercially available refrigerant recovery and recycling equipment operated by trained personnel. Halon must not be intentionally released into the environment while testing, maintaining, servicing, repairing, or disposing of halon-containing equipment or using such equipment for technician training.

6.4.8 Motor Vehicles

- The use of unleaded gasoline, low-sulfur diesel, alternative fuels, and vehicles that use these fuels is an important step in reducing harmful emissions and protecting the environment.
- Unleaded gasoline contains less lead, a toxic metal that can cause serious health problems and damage the environment, compared to traditional leaded gasoline. Using unleaded gasoline can reduce the amount of harmful emissions that are released into the air.

- Low-sulfur diesel contains lower levels of sulfur compared to conventional diesel fuel. This reduces the amount of harmful emissions produced when diesel engines are running, such as particulate matter and NOx, which are linked to respiratory problems, heart disease, and other health issues.
- Alternative fuels such as electricity, biofuels, hydrogen, and propane, can also help reduce emissions and improve air quality.
- It is important to note that the feasibility of using unleaded gasoline, low sulfur diesel, alternative fuels or vehicles that use these fuels may vary depending on various factors, such as availability, cost, and the infrastructure for these fuels. These considerations will be discussed at the program level considering contractual requirements and the factors mentioned above. Nonetheless, promoting the use of these fuels and vehicles will contribute to a cleaner and healthier environment.

6.5 Asbestos

6.5.1 Asbestos was widely used in many products from early in the 20th century until the 1970s. In locations where asbestos has been identified (older locations where no abatement has been conducted), it is important to have plans in place to protect people and the environment from the dangers of asbestos. Any material containing over 1% asbestos is called Asbestos-Containing Material (ACM). To keep everyone safe from asbestos, follow the guidelines in *Dodi's 6055.01 and 6055.05-M*.

6.5.2 Identification: Ensure that there is a list of known and presumed asbestos and ACM in all areas of responsibility. Wherever friable asbestos is identified, V2X personnel and building occupants must be notified and instructed on how to avoid disturbing it.

6.5.3 Reporting: If a V2X employee suspects that asbestos is present in a V2X occupied building, the employee will stop work immediately and contact the Program Manager and their EHS Representative. They will assess the situation.

6.5.4 Training: All workers who handle asbestos need to receive training to keep themselves and others safe. This training should include information on how to identify asbestos and the dangers it poses, as well as how to properly remove and control asbestos to minimize exposure. Training may cover topics such as how to use wetting techniques, ventilation systems, protective equipment, and filtering systems during asbestos removal. It is important for all workers and subcontractors involved in asbestos management to receive consistent training to ensure their safety.

6.5.5 Controls: In order to properly manage asbestos, a plan should be in place at all sites where asbestos may be found or has already been identified. This plan should include information on where the asbestos-containing materials (ACM) are located, how to notify and educate those who may be affected, and instructions for managing the asbestos. The plan should also have:
- A plan to regularly check and document any changes in the condition of the ACM.
- Systems to control any activities that could disturb the ACM.
- Practices to minimize the release of asbestos fibers during maintenance and operations.
- Records to document all activities related to identifying, managing, and removing asbestos.
- Training for employees involved in asbestos management to ensure they understand their duties. - - Procedures to assess and prioritize any hazards related to asbestos for removal.

6.5.6 Abatement: Asbestos abatement is the process of controlling the release of asbestos fibers from asbestos-containing materials. This includes removing, covering, or cleaning

up asbestos. Before starting any demolition or renovation work, it is important to determine if the activity will disturb or remove any asbestos-containing materials. If it will, the following steps should be taken:

- Make sure all personnel and building occupants are aware of the potential dangers and the actions being taken to control the asbestos.
- During the asbestos abatement, no one should be allowed to enter the area.
- An assessment should be done to ensure compliance with all relevant regulations, and a record of the assessment should be kept.

6.5.7 Disposal: Asbestos and asbestos-containing materials must be disposed of following all applicable regulations.

6.6 Lead and Lead-Based Paint

6.6.1 Lead in paint, dust, and soil can be harmful if not properly managed. Lead was used in paint to help it dry faster, last longer, and resist moisture. However, lead is a concern for both health and the environment. In some countries, lead is still added to paint. Buildings built after 1978 are usually assumed to be free of lead-based paint, as lead in paint was banned in the US in 1978. To learn about complying with lead exposure, refer to the *4.7.7 Industrial Hygiene and Occupational Health Program or DoDI's 6055.01 and 6055.05.*

6.6.2 Lead Identification: A plan will be created and put in place to identify, evaluate, and reduce lead hazards in paint, with a focus on child-occupied facilities if necessary. People who live or work in buildings with lead-based paint will be informed and given information on how to reduce lead hazards.

6.6.3 Lead Training: Workers involved in activities with potential lead exposure, such as inspecting or removing lead-based paint, must be properly trained. If there's a chance they'll be exposed to airborne lead, they must be informed of the health risks and trained in how to work safely with lead-based paint.

6.6.4 Lead Controls and Abatement: Lead hazards in paint will be controlled and removed as necessary. See *4.7.7 Industrial Hygiene and Occupational Health Program* for more information on how to assess, monitor, and prevent lead exposure.

6.6.5 Lead Disposal: Residential lead waste from paint can be disposed of as regular household waste. However, lead waste from abatement, renovation, or remodeling in child-occupied facilities is considered hazardous waste and must be disposed of accordingly. Lead waste from demolished structures is also considered hazardous waste. Always check relevant regulations for the latest information.

6.7 Polychlorinated Biphenyls (PCBs)

6.7.1 Polychlorinated Biphenyls (PCBs) are a group of synthetic organic chemicals that were banned in 1979 due to their toxic nature and persistent presence in the environment. These chemicals can accumulate in living organisms and were commonly used in electrical equipment, fluorescent light ballasts, insulation, hydraulic systems, switches, circuit breakers, and cables.

6.7.2 Identification: All transformers must be assumed to contain PCBs unless otherwise confirmed. Electrical equipment that may contain PCBs must be serviced according to relevant regulations. A written inventory of all known PCB items on the site must be maintained, including type of item, location, usage, and disposal dates.

6.7.3 Labeling: Equipment containing PCBs in concentrations greater than 50 ppm must be clearly labeled as such, with instructions for handling and storage, cautions, and emergency contact information.

6.7.4 Training: Personnel involved in servicing transformers and electrical equipment must be aware of the hazards posed by PCBs and must follow all relevant regulations.

6.7.5 Controls: The Spill Prevention and Response Plan must address the presence of PCBs if identified on the site. Any spill of PCB liquids with a concentration greater than 50 ppm requires immediate action and the contaminated soil must be removed and disposed of according to regulations. Records of spills and any corrective measures must be maintained and reported through the V2X Incident Management System if caused by V2X operations/employees/subcontractors.

6.7.6 Storage: PCBs and PCB items awaiting disposal must be stored in secure, closed facilities that are protected from precipitation and minimize the risk of accidental release. All storage areas must be regularly inspected to ensure containment integrity.

6.7.7 Record Keeping: Records of storage and disposal must be maintained if PCB waste is generated as a result of V2X operations.

6.7.8 Incineration: If a determination is made to incinerate PCB waste, combustion standards must be met. Monitoring of the process must occur at all times to ensure compliance.

6.8 Water Management

6.8.1 The primary goal of the water management program is to guarantee the integrity of the drinking water and wastewater/stormwater systems to ensure a constant water supply that complies with health and environmental standards.

6.8.2 **Water Conservation**: A comprehensive water conservation plan is essential to ensure efficient and sustainable water usage at federal facilities where V2X operates, as well as V2X leased or owned facilities. V2X operations will prioritize water efficiency by implementing measures such as low-flow plumbing fixtures and appliances, water metering, and the use of drought-tolerating landscaping. Preventive maintenance will be performed regularly to address any leaks or malfunctions in the water system. Best practices, such as reducing non-essential water usage during peak times, will also be followed to minimize water waste. These practices are particularly important in water-stressed regions where V2X has operations. Additionally, the plan will encourage water-saving behavior among staff and visitors through education and awareness campaigns. By adopting these measures, facilities will strive towards reducing their water footprints and preserving water resources for future generations.

6.8.3 **Drinking-Water and Distributed Water**

- Ensuring the quality of drinking and distributed water may be a service that V2X provides as part of the performance work statement. Drinking water can be contaminated by various factors such as naturally occurring chemicals and minerals, land use practices, maintenance and repair operations, and sewage overflows or wastewater releases.
- It is also important to have a contingency plan in place in case of natural disasters or other emergencies.
- A comprehensive water management program should address all aspects of the distributed water system where operationally necessary, and, if the distributed water is not potable, should also include the source of drinking water.
- Proper treatment is necessary to remove disease-causing pathogens and contaminants, both at the source and in the distribution system. The safety of drinking water is of utmost importance and requires ongoing vigilance to protect public health and comply with regulations and all contractual requirements.

- Monitoring, sampling, and recordkeeping: Drinking water sources are vulnerable to contamination and must undergo appropriate treatment to eliminate pollutants. Both non-public water systems (NPWSs) and public water systems (PWSs) have specific monitoring and treatment requirements to ensure the safety of the water provided for human consumption. NPWSs must be regularly checked for coliform bacteria and disinfectant residuals, while PWSs must have a monitoring and sampling plan in place that meets the frequency requirements based on the size of the system, including follow-up and notification procedures, and parameters for water quality sampling. To maintain the safety and quality of the drinking water, the operation and maintenance practices of the water distribution system must comply with relevant standards and regulations. It is also important to keep records of monitoring, corrective actions, and other relevant information in accordance with contractual requirements.
- Drinking water standards: To ensure safe and clean drinking water, it is important to monitor and treat water sources for contaminants that may pose health risks to consumers. The USEPA provides guidelines for drinking water quality standards, including a list of contaminants of interest and their respective maximum contaminant levels (MCL). These contaminants can range from microorganisms to organic and inorganic chemicals, radionuclides, and others. In addition to meeting MCLs, drinking water should also be free of noticeable tastes and odors, as they can affect its palatability. It is the responsibility of the water provider (if operated by V2X) to ensure that the water distribution system operates and is maintained in accordance with relevant national, regional, and local water quality standards and objectives, and that proper monitoring and treatment is conducted.
- Protection of Surface Waters: To protect surface waters across site areas of responsibility, a comprehensive water management program should be implemented including the following practices:
  - Prevention of pollutants entering surface waters through proper management of stormwater runoff, waste disposal, and spill response practices.
  - Implementation of best management practices to reduce the amount of pollutants entering surface waters from various site activities or operations. These could include proper storage of hazardous materials, implementing erosion and sediment control measures, and using less toxic alternatives for pest management.
  - Where required or recommended, monitor the quality of surface waters and conduct baseline and impact assessments to detect significant changes in water quality over time.
  - Proper maintenance and inspection of stormwater management systems, including retention ponds and sediment basins, to ensure their proper functioning.
  - Engaging all stakeholders in water conservation and protection efforts to raise awareness and promote collective action towards sustainable water management.
  - Documentation of all activities related to surface water protection and management, including monitoring data, water quality assessments, and BMP implementation.
  - V2X goal is to promote the continuous improvement of environmental practices including water management and the sustainable use of natural resources.
- Protection of Groundwater: In addition to protecting surface waters, it is also important to take measures to protect groundwater. Groundwater is a valuable resource and is crucial for drinking water supplies, irrigation, and other processes. Contamination of groundwater can have long-lasting impacts and can be difficult to remediate. It is

necessary to implement best management practices that prevent or minimize contamination to protect groundwater. This can include measures such as maintaining a vegetative buffer around certain operations, properly storing and disposing of hazardous materials, and properly sealing abandoned wells.

- Operation of Water Systems and Contingency Plans: Programs and locations that provide water services need to consider contingency plans. In an emergency, a well-planned and executed contingency plan for the water distribution system is critical. The contingency plan should outline procedures for responding to, and mitigating the impact of the emergency, such as a natural disaster, equipment failure, or a contamination event. The plan should take into account the size of the system, its critical components, and the potential consequences of an emergency. Key elements of the plan should include steps for immediate response, such as shutting down the affected part of the system, isolating contaminated areas, and implementing alternate water supply sources. Likewise, the plan should mention measures for long-term recovery, such as repairing or replacing damaged equipment, and/or conducting additional water quality testing.
- Alternative water supplies: In certain situations, it may be necessary to only use alternative water sources such as point-of-entry and point-of-use treatment devices, bottled water, and approved bulk water supplies. These sources will also be sampled and monitored for applicable contaminants. While rare, illness outbreaks associated with bottled water have occurred. Bottled water must originate from an approved source.

6.8.4 Wastewater and Stormwater

- Wastewater and stormwater management must be conducted in accordance with best practices and relevant standards in order to protect both the aquatic environment and groundwater resources. The management of wastewater typically involves regulations imposed by state or local agencies, as outlined in the following points:
- Nonpoint Source (NPS) Discharge Areas: NPS pollution originates from diffuse sources and is caused by rainfall or snowmelt that moves over the ground and picks up pollutants, ultimately depositing them into water bodies and groundwater. These pollutants can range from fertilizers, herbicides, and insecticides to bacteria, nutrients, and faulty septic systems. To prevent stormwater pollution from these sources, appropriate controls and management practices must be implemented, such as erosion control, regular inspections of septic systems, and proper disposal of pesticides, containers, and tank residues.
- Pollutant Discharge Systems and Permits (such as NPDES Permits): Any V2X operations that discharge wastewater into the waters of the United States or the Host Nation must have a permit to do so. This requirement applies to operators and owners of a facility, so the program must coordinate with the Contracting Officer to ensure compliance with this requirement. The permit, which is issued for a specific period, outlines the specific regulations for that facility.
- Monitoring, Sampling, and Recordkeeping for Permitted Sources: Sites must maintain records that document all regulated parameters for the discharge of pollutants. Monitoring records should include daily volume of effluent discharge, test procedures for analyzing pollutants, sampling location, time, and date, the name of the individual who performed the sampling, and analysis date. Additionally, records documenting personnel training and certifications, and any relevant records must be kept.

- Personnel Training and Certifications: Personnel responsible for operating wastewater systems or equipment and those involved with activities from the stormwater pollution prevention plan must receive appropriate training that is tailored to their specific duties and tasks.
- Sludge Disposal: All sludge produced from the treatment of wastewater must be disposed of in accordance with applicable regulations and contractual requirements for hazardous or solid waste, as applicable. Regular inspections of sludge disposal areas are required, and any changes in disposal procedures must be documented and reported to relevant agencies or the customer, especially if they may affect current permits.
- Discharges to Sewage Treatment Facilities: To comply with all regulations, it is necessary to follow the specified monitoring requirements, including the frequency of monitoring and acceptable parameters before discharging into navigable waters (US or HN).
- Industrial Wastewater Management: Industrial activities must adhere to any effluent limitations for pollutants as regulated, such as lead, cadmium, and toxic organics.
- Septic Tanks and Cesspools: Septic tanks must be operated in compliance with regulations and approved by the relevant authorities. Industrial wastewater cannot be discharged into a septic system. The use of large cesspools is prohibited in DoD installations.
- Stormwater Pollution Prevention Plan (SWPPP): Stormwater can carry pollutants such as debris, chemicals, dirt, and more into a storm sewer system or directly into water bodies. Therefore, sites, where stormwater pollution is a concern, must implement or follow the installation's Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must include all requirements for activities that could contaminate stormwater, good housekeeping practices, control of stormwater discharge, and minimization of pollutants.

6.9 Hazardous Materials Management

6.9.1 Materials that exhibit any of the following characteristics are considered hazardous:

Table 1. Characteristics of Hazardous Materials

TYPE OF HAZARD	CHARACTERISTICS
Physical	Explosive, flammable (gases, aerosols, liquids, or solids), an oxidizer (liquid, solid, or gas), self-reactive, pyrophoric (liquid or solid), self-heating, organic peroxide, corrosive to metal, gas under pressure, or when in contact with water emits flammable gas.
Health	Acute toxicity (any route of exposure), skin corrosion or irritation, serious eye damage or eye irritation, respiratory or skin sensitization, germ cell mutagenicity, carcinogenicity, reproductive toxicity, specific target organ toxicity (single or repeated exposure), or aspiration hazard.
Asphyxiant	Simple asphyxiant that displaces oxygen in the ambient atmosphere and can thus cause oxygen deprivation in those who are exposed, leading to unconsciousness and death.
Spontaneous combustion or spontaneous ignition	A gas that will ignite spontaneously in air at a temperature of 54.4°C (130°F) or below.

Regulated by the Host Nation	The item or its disposal is regulated by the HN because of its hazardous nature.

Adapted from DoDM 4715.05 Vol 4

6.9.2 Reducing Hazardous Materials: A comprehensive list of all storage facilities for hazardous materials will be maintained and kept up to date. The use of hazardous materials should be minimized whenever possible, and alternative options should be actively sought and evaluated for implementation, in line with active environmental initiatives being pursued by the company. For example, EPA's Safer Choice Program is a labeling program that helps purchasers identify and choose products that are safer for people and the environment. The program evaluates products based on their ingredients and their potential to cause adverse health or environmental effects.

6.9.3 Training: To ensure the safety of all personnel who work with hazardous materials, it is important that they receive adequate training. This training should cover their responsibilities and potential exposures when using, handling, or storing hazardous materials. This will help reduce the risk of incidents and ensure that personnel are aware of the appropriate measure to take in the event of an emergency. The training should be conducted by qualified and experienced trainers, and records should be kept for reference.

6.9.4 Hazard Communication: Employees and subcontractors must have access to information about the chemicals they use, handle, or store and understand the associated hazards. All locations that use hazardous chemicals must have proper labelling and safety data sheets (SDSs).

6.9.5 Storage and Handling: The storage of hazardous materials onsite must follow strict guidelines to ensure the safety of all personnel involved. All hazardous materials must be labeled with a hazardous material warning label that complies with applicable requirements and have a safety data sheet (SDS) readily available.

Figure 2. Labeling Hazardous Materials

- Sites must maintain a file of SDSs for each hazardous material used or stored at the site, which must be easily accessible to all personnel involved in handling hazardous materials. The use of storage facilities, containers, and packaging is limited to the specific hazardous materials they are approved and designed for.
- Hazardous materials must be stored in a manner that prevents exposure to precipitation, facilitates spill response, and provides adequate secondary containment. Drums and containers must not leak, and secondary containment measures must be used whenever necessary. All containers must be marked with their contents, dispensing areas must be located away from catch basins and storm drains, and containers must be handled with proper equipment to prevent damage or leaks.

- Unauthorized access to hazardous material storage areas must be controlled.

6.9.6 Transportation: To ensure safe transportation, programs must follow these guidelines:

- Shipping papers with clear descriptions of material quantities and identification, including SDS, must accompany the shipment.
- Company drivers must have a valid driver's license and be trained on hazardous material handling, including exposure risks, physical hazards, and emergency procedures.
- All company vehicles must undergo pre- and post-loading inspections by supervisory personnel.

6.10 Petroleum, Oil, and Lubricants (POL)

6.10.1 POL refers to hydrocarbon-based substances, including petroleum-based fuels and non-petroleum oils. There is environmental risk associated with storing and distributing these products.

6.10.2 Training: All personnel handling POL must be trained as required by regulations, including facility operations, equipment maintenance, spill response procedures, and spill prevention and response plan.

6.10.3 Storage and Handling: Containers must be designed to industry standards with gasket seals when not in use and spill and leak prevention. Inspection tests must be regularly performed and documented.

- Secondary containment may be necessary and must be appropriate for the system.
- Used containers must be labeled "USED OIL".
- Handling POL should not result in fuel vapor release and any spills must be cleaned up promptly.

6.10.4 Transportation: Transfer areas must have adequate containment measures, such as sorbent materials, weirs, booms, etc. Before departure, disconnection of oil transfer lines and inspection to prevent discharges must be conducted.

6.10.5 Containment Measures: Designed to prevent or minimize the release of POL in the event of a spill or leak. These measures typically involve physical barriers, such as weirs, booms, or solvent materials, which are placed around the transfer area to capture any spilled or leaked product.

- In order to be effective, the containment measures must be appropriately sized and placed to ensure that they can contain the full volume of the product being transferred plus an additional freeboard to accommodate any potential releases. This helps to ensure that the containment measures remain effective even if a spill exceeds the expected volume.
- Additionally, the containment measures must be constructed of materials that are compatible with the product being transferred, in order to prevent further contamination or degradation of the product. The transfer area itself should be designed to minimize the potential for spills or leaks, such as by using low-slope surfaces that prevent the accumulation of product and by providing adequate drainage to remove any spills or leaks that could occur.
- Regularly inspect and maintain containment measures and replace any damaged or worn components as needed.

Figure 3. Examples of Spill Containment

6.11 Underground and Aboveground Storage Tank Management

6.11.1 This procedure outlines the guidelines for the operation and management of storage tanks, including spill and overflow protection, leak detection, piping, secondary containment, and inspections.

6.11.2 Aboveground storage tanks are located on or above the ground, while underground storage tanks (USTs) have at least 10% of their combined volume underground. USTs can pose an environmental threat due to corrosion and poor installation or maintenance procedures. To avoid groundwater contamination, each site must maintain an updated inventory of all tanks in the area of responsibility.

6.11.3 For each tank, the following information should be available:

Table 2. Tank Inventory Information

	Tank # _____
Location	
Installation date	
Capacity	
Tank and Piping Attributes (Material, Protection, Secondary Containment)	
Spill and Overfill Protection	
Substance stored – Compatibility	
Release Detection	
Removal Details	
Replacement Details	
Closure Details (where applicable)	

6.11.4 Training: UST operators must be trained to fulfill their responsibilities. The USEPA sets minimum training requirements for designated Class A, B, and C operators. Training includes spill and overfill prevention, release detection, corrosion protection, emergency response, product and equipment compatibility, closure, reporting, recordkeeping, testing, inspections, environmental and regulatory consequences of releases, and operation and maintenance. All training records must be kept.

6.11.5 Spill and Overfill Protection: To prevent environmental problems from spills and overfills during delivery, spill, and overfill protection measures must be in place for UST Systems. Spills can be caught by using containment equipment such as spill buckets, catchment basins, or spill containment manholes. Overfill protection devices can shut off product flow, restrict product flow, or alert delivery operators with an alarm when the tank is close to being full. Operators must also operate UST systems in a way that prevents spills and

overfills in addition to properly operating and maintaining spill and overfill prevention equipment.

6.11.6 Corrosion Protection: Corrosion protection is an essential aspect of maintaining an underground storage tank. Corrosion can cause the tank to deteriorate and release hazardous materials into the environment. Corrosion protection systems can include coatings, cathodic protection, and proper design and construction. It is important to ensure that the materials used in the construction of the UST and its associated piping are compatible with the substances that will be stored in them.

- In addition to proper installation, regular inspection and maintenance of the corrosion protection system are necessary to ensure its effectiveness. This includes routine testing of cathodic protection systems, inspections for signs of corrosion or damage to coatings, and repair or replacement of any damaged or ineffective components.
- As with spill and overflow protection, operators must also ensure that USTs are operated and maintained in a manner that prevents corrosion. This includes monitoring the tank and its piping for signs of corrosion or other damage and taking corrective actions as necessary to prevent leaks and releases.
- It is important to note that different regulations may apply to corrosion protection depending on the jurisdiction, so operators should familiarize themselves with the relevant requirements and ensure compliance.

6.11.7 Release Detection and Prevention: Release detection and prevention measures are critical for ensuring the safe and proper operation of underground storage tanks. The following guidance outlines important measures that should be taken:

Release Detection Measures:

- Monthly Inventory Control: A monthly inventory control of the tank's product level can help detect any loss of product from the tank. Any discrepancies should be promptly investigated and resolved.
- Continuous Monitoring: The use of electronic monitoring systems can provide continuous monitoring of the tank's product level and can alert operators of any sudden changes that may indicate a potential release.
- Interstitial Monitoring: Interstitial monitoring involves placing sensors between the walls of the tank and the secondary containment system to detect any leaks. This type of monitoring can provide an early warning of potential releases.
- Groundwater Monitoring: GW monitoring involves testing the soil and groundwater around the tank for signs of contamination. This type of monitoring can detect releases that may not have been detected through other monitoring methods.

Release Prevention Measures:

- Cathodic Protection: Cathodic protection is a method of preventing corrosion of the tank by using an electric current to protect the tank's metal components from corroding.
- Routine Maintenance: Proper and routine maintenance of the tank and its components can help prevent leaks and releases. This includes regular inspections, cleaning, and repairs.
- Proper Handling and Proper Storage: proper handling and storage of the product being stored in the UST can also help prevent releases. This includes following manufacturer instructions for handling and storage and ensuring that only compatible products are stored in the tank.

By implementing these release detection and prevention measures, operators can help ensure the safe and proper operation of USTs and prevent potential environmental damage from releases.

6.11.8 Inspections: Regular inspections are necessary to ensure that the storage tank system remains in good condition and functions as intended. Inspections should comply with all relevant regulations and standards and should be conducted periodically. During inspections, operators should perform visual checks to detect any damages to the tank or piping and remove any liquid or debris that may have accumulated. Additionally, operators should check for obstructions in the fill pipe, which could impede product delivery, and inspect the containment area for signs of leaks or releases to the environment. A record of each inspection should be kept for documentation purposes.

6.11.9 Closure: When closing a UST system, it must be done in accordance with all applicable standards and regulations. This involves removing all liquids and sludges generated from the closure process, which must be characterized to determine if they are hazardous. Additionally, any changes of service must also be evaluated for potential environmental impact. Records of the closure process must be maintained to ensure that the closure is done properly, which includes the disposal of the UST system, its contents, and any contaminated soil.

6.12 Spill Prevention and Response

6.12.1 A spill or accidental release of petroleum products, oils, lubricants, or hazardous substances can pose risks to human health, wildlife, and vegetation, as well as cause damage to the environment. To prevent and manage such incidents, programs with such risk should establish or follow a spill prevention and response plan that includes measures to plan for, prevent, control, and report spills. The plan should identify the risks of releases or spills of hazardous substances or regulated materials and outlines the procedures to prevent and respond to such events. In case of an emergency, the safety and well-being of humans are the top priority, followed by efforts to protect the environment, sensitive areas, and property. It is important to have a contingency plan in place to respond to spills and other emergencies. The spill prevention and response plan must be regularly reviewed and updated to ensure compliance with applicable standards, best practices, and adequacy for the site. Significant spills or changes in operations should trigger plan updates. To ensure compliance with the plan all personnel must be adequately trained on spill prevention and response procedures. this includes spill reporting and notification requirements and the proper use of spill response equipment. In the event of a spill, immediate containment and cleanup actions must be taken to minimize harm to the environment and mitigate potential health and safety hazards. Finally, records of spills, response actions, and plan updates must be maintained.

6.12.2 Training: To ensure site safety, all personnel must receive training that simulates site-specific scenarios. This training should enable employees to identify and communicate hazards, as well as recognize evacuation routes and assembly points. Individuals should only respond to spills of suspected hazardous materials according to their level of training. Adequate training must be provided to personnel involved in spill response, based on the responsibilities, to ensure effective and prompt action. Additionally, all personnel must be briefed on the nature of possible spill hazards, as well as the location, content, and use of spill kits. To ensure an effective spill response, a Spill Response Team composed of properly trained employees, in collaboration with the local Fire Department and other emergency response entities as necessary, may be established. Response

actions should be coordinated with local authorities. All personnel exposed to, or involved in cleaning up incidental spills must have the appropriate personal protective equipment (PPE) and training in accordance with applicable standards to ensure their safety.

6.12.3 Prevention: to minimize the risk of environmental damage caused by spills of hazardous substances or POLs it is essential to have adequate handling and storage practices. A site-specific accident prevention plan is necessary for facilities that manage these materials, evaluating the potential for environmental harm. The plan should include the name and contact information of the person in charge, information on the site and its operations, areas of hazardous material storage, and emergency response equipment. additionally, procedures for the periodic inspection and integrity testing of storage containers and associated valves and pipes will be listed.

6.12.4 Response: to respond to a spill or accidental release, early detection is critical, and equipment and materials for response and cleanup must be kept at every hazardous materials/POL storage area. This equipment should be regularly maintained and inspected to ensure a quick response and may include fire extinguishers, communication, and alarm systems, eyewash stations, first aid kits, absorbent pads, spill socks, medical first aid supplies, containers or disposal bags, tools such as shovels and brooms, PPE including chemical-resistant gloves, protective safety goggles, face shields, and labels and tape as necessary. The response should prioritize the safety of the public and the protection of critical water and natural resources.

6.12.5 Evacuation Plan: The emergency response plan for spill prevention will also cover an evacuation plan for the site, with specific and detailed guidance in case of an emergency. This plan should include main and alternate evacuation routes.

6.12.6 Containment and Clean-up Procedures: In case of a spill, personal and public safety are the priority, and evacuation procedures will be initiated. Onsite response personnel will only attempt to clean up or control the spill if they have the proper training and equipment. They will identify the source and composition of the spilled material, determine the hazard level, prevent non-emergency personnel from entering the site, and notify trained response personnel. They will isolate and stop the spill, assess the extent of the release, and begin clean-up procedures. Evacuation of the area/adjacent areas will be initiated if necessary and after spill containment and hazardous waste disposal have been accomplished, the designated person will assess the spill site for evaluation of the damage. Short-term site restoration will be done by removing contaminated soil, decontaminating exposed surfaces, and taking other immediate actions required to allow workers to resume normal activities.

6.12.7 Reporting: The reporting section of the plan should emphasize the importance of promptly reporting any spill or release of POL or hazardous substances.

- If V2X operations cause a release, the immediate verbal notification must be followed by a complete report using the **Environmental Incident Management System** (see *4.7.6 Incident Reporting and Investigation Program*, Environmental Incidents). The report must include details such as the identification of the substance spilled, the quantity, the severity of the release, the date of the incident, the location and size of the affected area, the cause of the incident, and all corrective and preventative actions taken.
- Any significant spill exceeding reportable quantities, contaminating water resources, or when the release cannot be easily contained must be reported to the relevant regulatory agencies or authorities and Corporate EHS may be consulted to confirm reporting requirements. The environmental release reports will be submitted to the

Program Manager for review and records of environmental releases will be maintained in accordance with the recordkeeping policy.

- All incidents that resulted in, or could have reasonably resulted in, a catastrophic release of highly hazardous chemicals must have the investigation initiated within 48 hours.

6.13 Pest Management

6.13.1 An integrated pest management (IPM) is a comprehensive approach to pest management that incorporates a variety of control methods such as cultural, physical, mechanical, and biological controls as well as the judicious use of pesticides. The goal of an IPM plan is to prevent pest problems before they occur by implementing a variety of preventative measures such as sanitation, exclusion, and habitat modification, and to minimize the use of pesticides when they are necessary. IPM plans also include regular monitoring and inspection to detect and identify pests as well as to evaluate the effectiveness of control measures by taking a proactive and preventative approach to pest management. An IPM plan can help minimize the risks of pesticide exposure to people, animals, and the environment, while effectively controlling pest populations.

6.13.2 Pest Identification: Correct pest identification will determine the best preventive measures and reduce the unnecessary use of pesticides. It will also prevent the elimination of beneficial organisms. Records shall be maintained for each area detailing the monitoring techniques used per location and inspection schedules. The results of inspections should be documented with the appropriate recommendations.

6.13.3 Monitoring Progress: Pest monitoring shall be conducted by trained and knowledgeable personnel with a schedule that reflects the pest problem seasonality and life cycle of pests.

- Monitoring records shall include the date, location, type of pest, and the number of pests detected, as well as the control measures used and their efficacy.
- Pest monitoring records shall be maintained and kept up to date to identify changes in pest populations and to provide a basis for modifying the integrated pest management (IPM) plan as needed.
- Personnel involved in monitoring should be trained in the identification of pests and evidence of pest activity, including damage, droppings, and other signs. Training will also include how to record data and interpret monitoring results.

6.13.4 Setting Action Thresholds: Setting action thresholds is an essential step in the pest management process. Action thresholds are predetermined levels of pest activity that trigger the need for intervention. The establishment of these thresholds is critical because it helps to identify the appropriate control measures to be implemented. Action thresholds may vary depending on the type of pest, the location, and the level of tolerance for the presence of the pest. In some instances, a few pests may not warrant any action, while in other cases immediate action may be necessary to prevent further infestation. The establishment of action thresholds should be based on scientific evidence and data obtained through regular monitoring and inspection of the site.

6.13.5 Prevention: An integrated Pest Management program primarily aims to prevent pest infestations by eliminating conditions that attract them. These conditions may include the availability of food, water, and shelter. To prevent pest infestations, evaluate the possible preventive measures that can be implemented. Examples of preventive measures include reducing clutter, sealing entry points where pests can enter buildings,

promptly removing trash and overgrown vegetation, maintaining clean dining and food storage areas, installing pest barriers, removing standing water, and educating building occupants on these preventive practices.

6.13.6 Control: When the pest level surpasses a certain threshold, the IPPM program will implement the most effective and low-risk option available. Pest control methods include physical removal, pest trapping, heat/cold treatment, and pesticide application. Documentation of pest control actions is crucial to evaluate the success of control measures. This documentation will include on-site records of each pest control service, all pesticide applications, evidence that non-chemical control methods were considered, and recommendations for preventing future pest problems.

6.13.7 Hazard Communication and Prevention: To ensure the safety of personnel conducting pest management tasks a JSA/AHA/RA must be completed for each task. Based on the assessments, appropriate personal protective equipment (PPE) will be selected for the personnel. All pesticide applicators will be given suitable PPE for their work and the types of pesticides they may be exposed to. Certified pesticide applicators will make all pesticide applications in compliance with applicable standards. New applicators may be allowed to apply pesticides only under the strict supervision of a certified pesticide applicator.

- Employees and subcontractors must have access to information regarding the identity and potential hazards of pesticides used in pest management activities, in a format that is clear and easily understood.
- In addition, sites where hazardous chemicals, including pesticides, are present must have appropriate labels and safety data sheets available for personnel who may encounter these chemicals. All personnel must be trained on how to handle these chemicals safely and effectively.

6.13.8 Storage, Use, and Disposal of Pesticides: The storage, use, and disposal of pesticides are important components of an IPM plan. Pesticides should be stored in a well-ventilated area that is cool, dry, and away from sources of heat or flame. The storage area must have an inventory of all items and only registered pesticides with SDS and labels that include the appropriate use instructions and precautionary messages will be used. Best management practices will be followed to minimize the release of hazardous chemicals into the environment during pesticide application. Only the necessary amount of pesticide will be used, and any hazardous pesticide waste will be disposed of following the same standards for hazardous waste disposal. Records of pesticide application will be maintained to determine best management practices focused on prevention rather than pesticide application.

6.14 Solid Waste Management

6.14.1 Solid waste refers to various waste materials, including garbage, sludge, and other discarded materials generated from V2X operations. Contrary to popular belief, solid waste isn't limited to only solid materials and may include liquid, semi-solid, or gaseous waste in containers. A solid waste management plan is a program aimed at preventing waste generation, recycling, composting, and safe disposal of waste materials. The plan should prioritize waste prevention and follow the pollution prevention hierarchy which includes source reduction, reuse, recycling, and waste disposal as a last resort.

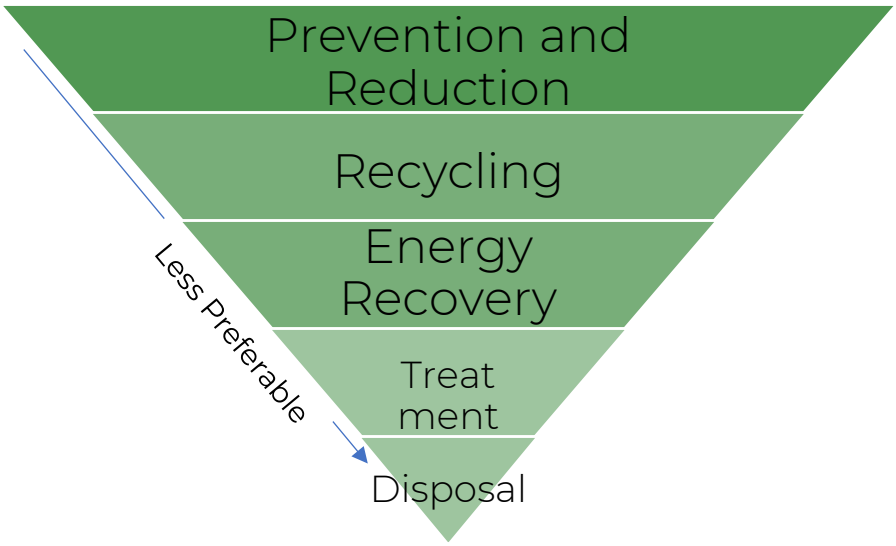

Figure 4. Pollution Prevention Hierarchy

6.14.2 Training: Proper and relevant training is essential for ensuring the success and safety of solid waste management operations and recycling programs. Employees involved in solid waste management activities should receive training that is specific to their assigned responsibilities and duties. This includes training on the safe handling and storage of solid waste, proper use of personal protective equipment, operation and maintenance of equipment, and waste disposal regulations and procedures. Employees need to stay up-to-date on changes in regulations and best practices to ensure the safe and effective management of solid waste.

6.14.3 Waste Prevention: Waste prevention is an important part of sustainable waste management and has many benefits, including reducing the use of natural resources, minimizing pollution, and saving money on disposal costs. It is important to prioritize waste prevention efforts before recycling or disposal options are considered.

- When options exist, a product that is designed for recycling and can be effectively recycled, is durable, and is sustainable is the preferred option. This practice is in line with V2X green procurement policy.
- Reusable products and packaging are items that can be used multiple times reducing the amount of waste generated and saving resources. Reusable coffee cups, refillable ink cartridges, and reusing packaging materials such as cardboard boxes and bubble wrap are some examples that can be implemented.
- Practices that prolong a product's life can help reduce waste by avoiding premature disposal and the need for repurchasing. Proper maintenance of products such as

electronics, appliances, and vehicles can extend their useful life. This can include cleaning, oiling, and replacing parts as needed. When a product breaks or malfunctions, it is often more cost-effective to repair it rather than replace it. In some cases, upgrading a product can extend its useful life. For example, upgrading a computer's memory or adding a new battery to a phone can make the device run faster and last longer. Finally, storing products in a dry, cool place can prevent damage and extend their lifespan. Using products as intended and following the manufacturer's instructions can help prevent damage and prolong their lifespan.

- Goods that do not last long or cannot be reused and recycled should be avoided, if possible.

6.14.4 Separation, Collection, and Transportation: Separating waste at the source, collecting it efficiently, and transporting it to the proper disposal or recycling facilities are critical aspects of solid waste management. In this context, this process requires careful planning, implementation, and monitoring to ensure that waste is managed in a safe, sustainable, and cost-effective manner.

- Waste characterization is the process of identifying and measuring the amounts of each element in the waste stream and determining their primary sources. This information is then used to create a plan for managing the waste in the most effective way possible. The categories of waste selected for segregation will depend on the site's integrated waste management plan and the site's ability to handle each category. The plan must also include materials that will be separated for recycling.
- To avoid the attraction of pests and the spread of disease, solid waste containing food must be collected at least once a week, and the frequency of waste collection may need to be adjusted for sites where waste bins reach capacity quickly. Containers for solid waste containing food must be leak-proof, waterproof, and vermin-proof, and have functional lids that are durable and able to withstand environmental conditions.
- When collecting and transporting solid waste, vehicles must be enclosed or have adequate provisions to prevent spillage. Depending on the level of segregation required, vehicles with multiple compartments may be needed. Finally, storage areas must be sufficient in size to accommodate the volume of waste generated, easy to maintain, and safe for efficient collection.

6.14.5 Composting: Composting is a natural process that involves the decomposition of organic materials such as food and yard waste into a nutrient-rich soil amendment. Considerations for establishing a composting program include communication with appropriate base or site personnel, selecting an adequate location, such as an area with good drainage and adequate space, selecting the appropriate composting method, such as a bin, pile, or tumbler, and determining the types of materials that will be accepted for composting. It is important to properly manage a composting program to avoid odors and pests and to ensure that the compost is properly cured and ready for use. Composting can be a valuable component of a solid waste management plan as it diverts organic waste from landfills and reduces greenhouse gas emissions.

6.14.6 Recycling: Recycling involves collecting items that would otherwise be considered waste, sorting and processing them into raw materials, and then remanufacturing those materials into new products. To establish a recycling program, applicable policies must be followed, and a plan should be created to indicate how recyclable materials are collected, segregated, and stored. These materials should be stored in a manner that doesn't pose a fire, health, or safety hazard, or attract vectors. Additionally, recyclable receptacles should be kept free of trash. The location and description of recycling facilities

should be documented, and any required permits should be tracked. Implementing a recycling program can save energy and resources, reduce the need for landfills, and incineration facilities, and prevent greenhouse gas emissions and other pollutants.

6.14.7 Landfilling: Landfills are specifically designed sites for the disposal of waste materials to prevent surface and groundwater contamination, reduce risks to workers' health, and control air pollution. Landfills can also generate energy by recovering methane gas. To ensure safety and Environmental Protection, landfills must adhere to various standards and practices governing their design, operation, and eventual closure. When disposing of materials in landfills, it is important to follow best management practices to ensure safety and Environmental Protection. These practices include groundwater monitoring, which involves regular testing of nearby groundwater to ensure that the landfill is not contaminating it. The use of liners and caps to prevent leakage and the installation of gas collection systems to capture and utilize methane generated by the landfill are also recommended, whenever this option can be implemented. Landfills should be designed, operated, and closed in accordance with applicable regulations and standards, including proper closure procedures such as capping the landfill and installing a final cover to prevent leachate from escaping. Regular maintenance and inspections are necessary to ensure that the landfill is functioning properly and to identify any potential issues before they become larger problems. Proper management of landfills can help minimize negative impacts on the environment and public health.

6.14.8 Waste Incineration: A method of waste disposal that involves the controlled burning of waste materials. This process can reduce the volume of waste by up to 90%, and it can also generate electricity through energy recovery. However, incineration is only suitable for certain types of waste, including non-recyclable and non-hazardous materials such as medical waste, sewage sludge, and some types of plastics. To manage emissions from incineration, modern incinerators are equipped with pollution control technologies that can filter and clean the gases released during the combustion process. This includes the use of scrubbers, filters, and electrostatic precipitators to remove pollutants such as sulfur dioxide (SO_2), nitrogen oxides (NO_x), and particulate matter (PM). Energy recovery from incineration is achieved using waste-to-energy facilities that can generate electricity from the heat generated during the combustion process. This energy can be used to power homes and businesses and it can also offset the need for fossil fuel-based energy sources.

- Open burning of waste is not allowed because it can release toxic pollutants into the air, pose a risk of fire and cause health hazards for workers and nearby residents. Additionally, open burning of certain materials, such as plastics and rubber, can release dioxins and furans, which are toxic chemicals that can cause serious health effects. Therefore, it is important to ensure that waste incineration is conducted safely, with appropriate technology and emissions controls, and in accordance with relevant regulations and guidelines.

6.14.9 Land Application/Biosolids: Biosolids are a valuable resource that can be obtained from properly treated and processed sewage sludge. Once treated and processed, they can be safely applied to land for beneficial reuse. The application of biosolids helps improve soil health and fertility, increases crop yields, and reduces the need for chemical fertilizers. However, before land application, biosolids must meet strict pollutant limits, pathogen reduction requirements, and vector attraction reduction requirements. This is to ensure that they do not pose a risk to public health or the environment. Land application of biosolids is subject to strict regulations and guidelines that are designed to protect human health and the environment. The regulations ensure that the land application of

biosolids is done safely and responsibly and that the biosolids are used only in areas where their application is beneficial and poses no harm.

6.14.10 Contingency Planning: A contingency plan is an essential aspect of any waste management plan to ensure that appropriate measures are in place in case of failure of any of the management or disposal options. In preparing a contingency plan, it is essential to have the following information.

- Disposal facilities within a 50-mile range of the site and their points of contact. The plan should include a list of all available disposal facilities within a 50-mile range of the site, their contact information, and the types of waste they accept. This information will be useful in case the primary disposal facility is unavailable or if the waste cannot be accepted due to unforeseen circumstances.
- The plan should also include the contact information of federal, state, and local solid waste management offices. These contacts can provide information on regulatory requirements and emergency response procedures in case of a waste management emergency.
- The plan should include detailed emergency response procedures, including steps to be taken in case of a waste spill, fire, or other emergency.
- The plan should identify the equipment and supplies necessary to implement the contingency plan, including personal protective equipment, spill containment materials, and waste transportation equipment. P
- The plan should identify the personnel responsible for implementing the contingency plan and their contact information. The personnel should be adequately trained in emergency response procedures and should be available to respond to emergencies on short notice. By having a contingency plan in place, waste management facilities can minimize the impact of unforeseen events on the environment, public health, and safety.

6.15 Hazardous Waste Management

6.15.1 Hazardous waste is any discarded material that is potentially dangerous or harmful to human health or the environment. This includes waste that is ignitable, corrosive, reactive, toxic, or radioactive. Examples of hazardous waste include chemicals, batteries, pesticides, medical waste, and electronic equipment. Hazardous waste requires special handling, storage, transportation, and disposal procedures to minimize the risk of harm to people and the environment.

6.15.2 Hazardous waste generators must oversee the fate of the waste. *THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)* defines hazardous waste as: “A solid waste, or combination of solid waste, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may (a) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.” Programs must, whenever feasible, establish waste minimization efforts and goals.

6.15.3 Training: Training on hazardous waste handling is necessary to ensure that workers are knowledgeable and equipped with the skills needed to handle hazardous waste safely and effectively.

6.15.4 Hazard Communication: Hazard communication is a critical component of handling hazardous waste. It is essential to ensure that personnel who handle hazardous waste are

aware of the potential hazards associated with the waste they handle and the measures they can take to protect themselves and others. Hazard communication involves identifying the hazards associated with the waste and communicating this information to the personnel who handle the waste. Training on hazard communication for personnel who handle hazardous waste should include an understanding of the risks associated with hazardous waste, including the potential for fire, explosion, toxicity, and environmental harm. Personnel should also be trained on the use of personal protective equipment, PPE, and the importance of proper waste handling and disposal procedures. The training should cover the labeling requirements for hazardous waste containers, including the use of warning labels, hazard symbols, and emergency contact information. Personnel should also be trained on the proper storage and handling of hazardous waste, including the use of appropriate containers and storage areas. In addition to the physical hazards associated with hazardous waste, personnel should also be trained on the potential health effects of exposure to hazardous waste. This includes the signs and symptoms of exposure to hazardous waste and the importance of seeking medical attention if exposure occurs. Hazard communication training should also include emergency response procedures, including the use of spill kits and emergency response plans. Personnel should know how to respond to a hazardous waste spill, including how to contain the spill, how to use PPE, and how to contact emergency responders. Overall, Hazard communication is critical to ensuring the safe handling and disposal of hazardous waste. By providing personnel with the knowledge and training they need to identify hazards, use appropriate PPE, and follow proper handling and disposal procedures, we can minimize the risks associated with hazardous waste and protect the health and safety of personnel and the environment.

6.15.5 Characterization: Hazardous waste characterization is the process of identifying and classifying hazardous waste based on its properties. It is essential for proper handling, transportation, and disposal of hazardous waste. Characterization includes determining the physical, chemical, and toxicological properties of the waste to determine its classification as a hazardous waste. The hazardous waste generator is responsible for determining whether the waste is hazardous or not. This involves evaluating the waste against various criteria such as waste toxicity, reactivity, ignitability, and corrosivity. Hazardous waste must be classified and labeled appropriately to ensure proper handling, transportation, and disposal. Proper characterization ensures that the waste is handled and disposed of safely and in compliance with all applicable regulations.

- If the properties that make a waste hazardous are changed by treatment, the hazardous waste may no longer be classified as hazardous.
- To identify hazardous waste streams, generators will use a Hazardous Waste Profile Sheet (HWPS) (See definition). This must be updated to reflect any new waste streams or process modifications if they change the character of the hazardous waste being generated.

6.15.6 Recycling and Treatment: Hazardous waste must be recycled or reused whenever possible while safely stored to minimize risks. Treatment technologies such as incineration or oxidation may be used to reduce the waste volume or hazardous characteristics.

- Used oil fuel can be burned for energy recovery, and incinerators, boilers and industrial furnaces used to burn hazardous waste must follow best management practices to control harmful emissions. Hazardous waste. Used oil or oil contaminated with hazardous waste cannot be used for dust suppression or road treatment.

- Used batteries and antifreeze should be recycled when possible or managed as regular solid waste if deemed non-hazardous.
- Biodegradation and recovery technologies like distillation or carbon adsorption can also be used.
- Other treatment means must ensure the waste's hazardous characteristics are no longer present after treatment, like neutralizing corrosive wastes to a pH between 6 and 9.

6.15.7 Storage: Storage requirements for hazardous waste include:

- Hazardous waste accumulation points (HWAPs) must be located at the point of generation or nearby and must provide appropriate segregation for different waste streams.
- Hazardous waste storage areas (HWSAs) must comply with health and safety requirements, be regularly inspected, and records of inspections maintained.
- Unauthorized personnel are not allowed in hazardous waste storage areas. Ignitable, reactive, or incompatible waste must be stored safely to avoid hazards such as extreme heat, fire, explosion, and toxic gas generation.
- Ignitable and/or reactive waste must be protected from sources of heat or reaction, and personnel should not smoke near these storage areas.
- Water-reactive waste must not be stored in the same area as flammable and combustible liquids.
- Hazardous waste container storage areas must include secondary containment and meet regulatory requirements. Containers holding hazardous waste must be in good condition and marked with hazardous waste markings. Containers holding hazardous waste must be closed except when adding or removing waste and must be emptied of residues before disposal.
- The accumulation of large quantities of empty hazardous waste containers should be avoided and hazard warning labels should not be removed.

6.15.8 Transportation: Hazardous waste is transported from the generators side to a facility for treatment, recycling, storage, or disposal. When transporting hazardous waste, generators must comply with applicable transportation regulations. Package the waste correctly and label it properly. The waste must be accompanied by a manifest that tracks it from generation to disposal, except in cases where it is being sent to a recycling facility.

- The manifest includes details such as the generator's name and contact information, the transporter's name and contact information, the destination's name and contact information, the description and quantity of the waste and the dates of shipment and receipt. Examples of manifest forms include *EPA Form 8700-22 and DD Form 1348-1A or DD Form 1348-2*. Where applicable, use HN forms.

6.15.9 Disposal: To dispose of hazardous waste properly, it must be contained permanently in a facility designed to protect water resources, such as a specialized landfill. Hazardous waste must meet all relevant treatment standards before being disposed of in a landfill. If disposing of hazardous waste in a host nation, it must be ensured that the local treatment and containment methods effectively prevent harm to human health and the environment.

6.15.10 Contingency Planning: A list of information necessary for a contingency plan is needed if any of the treatment or disposal of hazardous waste available options should fail. Include alternate storage sites or alternate means of treatment and disposal in the contingency plans.

6.16 Regulated Medical Waste Management

6.16.1 The management of medical waste is limited to mixtures of medical and hazardous waste and excludes household waste. It is handled at medical, dental, R&D and veterinary facilities involved in the diagnosis, treatment, immunization of humans or animals, and/or production or testing of biologicals. Due to the potential danger and risk of disease spread or environmental contamination, regulated medical waste requires special handling. Before handling and disposal, a JSA/AHA/RA must be completed.

6.16.2 Training: The training of personnel who handle medical waste will ensure that the waste is managed and disposed of in a safe and compliant manner. The training should be tailored to the specific job duties of each employee, and it should be provided as needed to ensure that employees are up to date on the latest regulations and best practices. The training program should cover various aspects of medical waste management, such as waste segregation, packaging, labeling, storage, transportation, and disposal. In addition, the training program should be documented, and records of training should be maintained for each employee. Training for personnel handling infectious medical waste must include risks associated with exposure to infectious agents, pathogens, and other physical hazards.

6.16.3 Personal Protective Equipment (PPE): Types of PPE required may vary depending on the type and quantity of medical waste being handled and the procedures being performed. However, it is generally recommended that PPE be selected based on the level of risk posed by the waste, with higher levels of protection being used for materials with greater potential for exposure. PPE should be used in conjunction with other infection control measures, such as hand hygiene and waste segregation to provide comprehensive protection against infectious medical waste. Additionally, all PPE should be properly removed and disposed of after use to prevent cross contamination and ensure the safety of personnel and the environment.

6.16.4 Infectious Medical Waste: Infectious medical waste must be marked with the universal biohazard symbol, stored in designated areas free of pests, and transported in disinfected vehicles without the use of mechanical loading devices that may rupture containers. Disposal options must comply with applicable regulations.

6.16.5 Infectious Hazardous Waste: Infectious hazardous waste will be segregated from general infectious waste when additional treatment is required.

6.16.6 Radioactive Medical Waste: In a typical medical facility, there are a variety of radioactive materials used, ranging from diagnostic materials to more complex treatment materials. The first step in handling radioactive medical waste is to identify the type of radioactive medical waste. Proper labeling and documentation are key to ensuring that the waste is handled correctly. Next, personnel who handle radioactive medical waste must wear appropriate personal protective equipment (PPE), to prevent exposure to radiation. This includes gloves, lab coats, and sometimes even respirators. The waste must also be properly segregated and stored in appropriate containers. These containers must be clearly labeled with the type of waste, radiation level, and other relevant information. Any broken or damaged containers must be immediately reported and handled according to proper procedures. When transporting radioactive medical waste, it is important to ensure that all containers are secured and labeled. The vehicle used for transport must also be suitable for the type of waste being transported and must be clearly labeled with the appropriate radiation warning signs.

6.16.7 Noninfectious Medical Waste: Noninfectious medical waste will be managed as solid waste.

6.16.8 Contingency Planning: A list of information necessary for a contingency plan is needed if any of the treatment or disposal of medical waste available options should fail. Include alternate storage sites or alternate means of treatment and disposal in the contingency plans.

6.17 Sustainable Procurement

6.17.1 Sustainable practices are critical for V2X to adopt as we strive for long-term success. Not only do sustainable practices protect the environment and promote social responsibility, but they can also improve operational efficiency, reduce costs, and enhance brand reputation.

6.17.2 One key aspect of sustainable practices is ensuring that the supply chain is sustainable. This means evaluating the environmental and social impacts of suppliers, as well as ensuring that suppliers follow sustainable practices. By promoting sustainable practices throughout the supply chain, V2X can have a greater positive impact on the environment and society.

6.17.3 In addition, new requirements from federal customers are increasingly demanding that companies adopt sustainable practices in their operations. For example, the US government has set sustainability goals that require federal agencies to reduce their greenhouse gas emissions and increase their use of renewable energy. Contractors that work with federal customers will need to demonstrate their ability to meet these requirements. An example would be the Navy's Environmental Management System (EMS) goals and policy that require contractors to:

- Reduce purchase and use of toxic and hazardous materials;
- Expand purchase of green products and services; increase recycling;
- Reduce energy and water use;
- Increase use of alternative fuels and renewable energy;
- Integrate green building concepts in major renovations and new construction;
- Prevent pollution at the source; and
- Continual improvement

6.17.4 Investor interests are also driving companies to adopt sustainable practices many investors are now looking for companies that prioritize sustainable practices and are committed to long-term growth. This is because sustainable practices can provide a competitive advantage, reduce risks, and improve financial performance.

6.17.5 Whenever feasible, procure and use products that are: Energy-efficient; Water-efficient; Bio-based; non-ozone-depleting; Environmentally preferable (e.g., Electronic Product Environmental Assessment Tool (EPEAT)-registered); Contain recycled content; Are non-toxic or less toxic (e.g., SaferChoice labels); where such products and services meet performance requirements.

6.17.6 Green Procurement Compilation: The Green Procurement Compilation (GPC) is a comprehensive green purchasing resource designed for federal contracting personnel and program managers, as well as vendors working with federal agencies. The Green Procurement Compilation website is a valuable resource for organizations seeking to make environmentally friendly purchases. The website is a compilation of environmental requirements, standards, and ecolabels for a wide range of products, including building materials, electronics, furniture, and vehicles. The website is designed to help procurement personnel identify and evaluate environmentally preferable products, and it includes information on the environmental attributes of products such as recycled content, energy efficiency, and low toxicity. The Green Procurement Compilation website

is updated regularly to reflect the latest environmental standards and ecolabels, and it includes links to relevant government agencies and organizations. The website is user-friendly and allows users to search for products based on a variety of criteria. Including product category, environmental attribute, and ecolabel. It also provides information on the benefits of green procurement such as reduced environmental impacts, improved worker health and safety, and cost savings over the life of the product. The GPC lists products for which the EPA, DOE, USDA, or other agencies have issued designations or otherwise provided guidance for products with environmentally preferable or energy-saving attributes.

6.18 Management of Change (MOC)

6.18.1 In the event of any changes in a process or operation, an evaluation should be conducted and documented to assess any potential impacts on the health and safety of personnel, as well as the environment. This practice will ensure the control of EHS risks when there are changes in process chemicals, technology, equipment, procedures, or facilities. Documentation is important, including the technical basis for the change as well as any input from the customer.

7.0 ADDITIONAL INFORMATION

- None

8.0 RECORDS

Records generated from this document will be retained according to the *6.5.1 DATA RETENTION & DESTRUCTION.* If additional questions arise, reach out to Legal for guidance.

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