



## AS-2 Hazardous Waste Removal and Management - Audit Summary of Results

Company Name: \_\_\_\_\_ Address: \_\_\_\_\_

Auditor's Name: \_\_\_\_\_ Dates of Audit: \_\_\_\_\_

Date of Follow-up Audit: \_\_\_\_\_

Attribute Ratings: 1 = Unsatisfactory, 2 = Poor or Weakness, 3 = Satisfactory, 4 = Better than Average, 5 =

Section	Comments	Section Score	Rated Value	Expected Value	Major Finding Recorded	Minor Finding Recorded	Observation Recorded
<b>ADMINISTRATIVE PRACTICES</b>							
Business Structure							
Hazardous Waste Management Positions (Corporate)							
Hazardous Waste Management Positions (Project)							
Other Functions and Requirements							
Hazardous Waste Generation and Accumulation Requirements							
Documentation Requirements							
Required Skills, Proficiencies, and Training							
<b>Administrative Practices Results</b>	This is an average of all Administrative Practices sections. It must be 3.0 or greater.						
<b>TECHNICAL CAPABILITIES</b>							
Technical Capabilities (Work Practices)							
Technical Capabilities (Documentation)							
<b>Field Practices Results</b>	This is an average of all Field Practices sections. It must be 3.0 or greater.						



## AS-2 Hazardous Waste Removal and Management - Administrative Practices Audit Score Sheet

Attribute Ratings: 1 = Unsatisfactory, 2 = Poor or Weakness, 3 = Satisfactory, 4 = Better than Average, 5 = Outstanding

### Business Structure (7.1)

Assessment of the business structure required to manage the hazardous waste removal and management program and ensure compliance with higher tier requirements.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
1	<b>Statement of Quality Policy including commitment to employee safety and health, and compliance with hazardous waste requirements 7.1.1</b>	Contractor must provide a written commitment to perform quality work and emphasizes employee safety and health, and compliance with hazardous waste requirements. Expected: Contractor provides evidence of the quality statement including direction emphasizing employee safety, health, and compliance with hazardous waste requirements. The statement is prominently posted, and available for employees, managers, and customers to see. Outstanding: Contractor must provide evidence of routinely reminding people of the quality commitment or emphasizing quality principles related to personnel safety, health, and compliance with hazardous waste removal and management requirements. Examples include banners, prominent posting, or inclusion in periodic meeting discussions.			3			
2	<b>Effective in-house management team 7.1.3 &amp; 7.1.5</b>	Contractor must show evidence of an effective in-house management team including Hazardous Waste Manager, Environmental, Safety, and Health Manager, Training Manager, QA Manager, Project Manager, Project Hazardous Waste Manager, and Project Environmental, Safety, and Health Manager. Contractor must provide evidence that there is enough depth in the organization to support all of the large jobs the contractor can perform simultaneously. Expected: Show evidence of job descriptions, experience, training, or other qualifying factors and names of managers meeting the specific factors. Outstanding: Provide a list of qualified personnel for each of the positions to allow for expansion or replacement assignments as needed.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
3	<b>Effective in-house management team 7.1.4</b>	Contractor should show evidence that the Hazardous Waste Manager, Environmental, Safety, and Health Manager, Training Manager, QA Manager, Project Hazardous Waste Manager, and Project Environmental, Safety, and Health Manager are not responsible for production goals. Expected: Show evidence in a company manual or directive that these positions are generally (not exclusively) isolated from the production responsibilities. Outstanding: Show evidence in a company manual or directive that these positions are specifically isolated from the production responsibilities.			3			
4	<b>Organizational Chart and Job Descriptions 7.1.6</b>	Contractor must provide an organizational chart or contact list for significant personnel within the organization. A large company may have more than one list at the supervisory level but should include all company principle officers. Expected: One or more organizational charts covering CEO or Company Executive down to the supervisor specifically including the Hazardous Waste/Environmental, Safety and Health assignments. Outstanding: Organizational charts would include photos and contact information for easy identification and access.			3			
<b>Business Structure (7.1)</b>			<b>Original Section Score:</b>					

### Hazardous Waste Management Positions (Corporate) (7.2)

Assessment of Hazardous Waste Management personnel positions (corporate) as assigned in the Hazardous Waste Management Manual.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
5	<b>Hazardous Waste Management Program including Hazardous Waste Management Manual 7.2.1</b>	Contractor must provide access to the Hazardous Waste Management Program Manual. NOTE: Hazardous Waste Management Manual may be part of another manual. It does not have to be stand alone. Expected: Access by managers and supervisors to a hard copy or electronic manual meeting the standards below. Outstanding: Evidence that the manual (hard copy or electronic) is readily available to all personnel on all work sites and that the managers refer to sections of the manual frequently to emphasize their commitment to the requirements. The manual shall cover all aspects of the Hazardous Waste Management Program itemized below:			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
6	<b>Hazardous Waste Manager responsibilities - Overall Program Management - Appendix A A.2.1</b>	Contractor must provide access to the position descriptions, training, and certification requirements for Hazardous Waste Manager. Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Hazardous Waste Manager to manage overall Hazardous Waste Management Program. Outstanding: The position descriptions must include a list of core duties, as well as desired experience, training, and/or education. Positive statement in the manual that the Hazardous Waste Manager is not the same person responsible for job completion, such as the Project Manager, Foreman, Supervisor, or Project Manager.			3			
7	<b>Hazardous Waste Manager responsibilities - Overall Program Management - Appendix A A.2.1.1</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Hazardous Waste Manager to supervise the Project Hazardous Waste Managers. Outstanding: Not possible for this element.			3			
8	<b>Hazardous Waste Manager responsibilities - Maintain HWM manual - Appendix A A.2.1.3</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Hazardous Waste Manager to maintain the Hazardous Waste Management Manual. Outstanding: Verification that the manual is reviewed and updated as needed at least annually.			3			
9	<b>Hazardous Waste Manager responsibilities - Review &amp; Maintain all data generated - Appendix A A.2.1.4</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Hazardous Waste Manager to review and maintain all data generated to support the functions defined in the Hazardous Waste Management Manual. Outstanding: Evidence of the reviews and corrective or preventive actions taken. Evidence may be spread sheets, notes, e-mails, or instruction changes.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
10	<b>Review In-House Surveillances and Audits A.2.1.4.</b>	Expected: Manual must direct the Hazardous Waste Program Manager or similar position to review In-House Surveillances, Inspection Reports, and Audits to determine compliance with applicable requirements and specifications. Outstanding: Electronic database with the ability to analyze data collected during surveillances and audits and evidence that the data has been used to improve the process.			3			
11	<b>Environmental Safety &amp; Health Manager responsibilities - Overall Program Management - Appendix A A.2.2</b>	Contractor must provide access to the positions descriptions, training, and certification requirements for Environmental Safety & Health Manager. Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Environmental Safety & Health Manager to manage overall Environmental Safety & Health program. Outstanding: The position descriptions must include a list of core duties, as well as desired experience, training, and/or education. Positive statement in the manual that the Environmental, Safety & Health Manager is not the same person responsible for job completion, such as the Foreman, Supervisor, or Project Manager.			3			
12	<b>Environmental Safety &amp; Health Manager responsibilities - Supervision - Appendix A A.2.2.1</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Environmental Safety & Health Manager to supervise the Project Environmental, Safety, and Health Manager, Competent Person and Qualified Person. Outstanding: Not possible for this element.			3			
13	<b>Environmental Safety &amp; Health Manager responsibilities - Maintain Environmental Safety &amp; Health manual - Appendix A A.2.2.3</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Environmental Safety & Health Manager to maintain the Environmental Safety & Health Manual. Outstanding: Verification that the manual is reviewed and updated as needed at least annually.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
14	<b>Environmental, Safety, &amp; Health Manager responsibilities - Review &amp; Maintain all data generated - Appendix A A.2.2.4</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Environmental Safety & Health Manager to review and maintain all data generated to support the functions defined in the Environmental Safety & Health manual. Outstanding: Evidence of the reviews and corrective or preventive actions taken. Evidence may be spread sheets, notes, e-mails, or instruction changes.			3			
<b>Hazardous Waste Mgmt. Positions (Corporate) 7.2</b>				<b>Original Section Score:</b>				

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
<b>Hazardous Waste Management Positions (Project) 7.2</b>								

Assessment of Hazardous Waste Management personnel positions (corporate) as assigned in the Hazardous Waste Management Manual.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
15	<b>Project Hazardous Waste Manager responsibilities - Project Level Program Management - Appendix A A.2.3.1</b>	Contractor must provide access to the positions descriptions, training, and certification requirements for Project Hazardous Waste Manager. Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Hazardous Waste Manager to manage the Hazardous Waste Program at the Project level. Outstanding: The position descriptions must include a list of core duties, as well as desired experience, training, and/or education. Positive statement in the manual that the Project Hazardous Waste Manager is not the same person responsible for job completion, such as the Foreman, Supervisor, or Project Manager.			3			
16	<b>Project Hazardous Waste Manager responsibilities - Collect and Review Data Related to Hazardous Waste Management - Appendix A A.2.3.2 &amp; A.2.3.3.</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Hazardous Waste Manager to collect and review data, inspection sheets, inventory, and any other data related to the Hazardous Waste Program at the Project level. Outstanding: Not possible for this element.			3			
17	<b>Project Hazardous Waste Manager responsibilities - Ensure Waste Manifesting is correct - Appendix A A.2.3.4</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Hazardous Waste Manager to review and maintain copies of all hazardous waste manifests generated for the project. Outstanding: Not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
18	<b>Project Hazardous Waste Manager responsibilities - Environmental, Safety, &amp; Health surveillances - Appendix A A.2.3.3</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Hazardous Waste Manager to review and maintain all data generated through Environmental, Safety, and Health process surveillances. Outstanding: Evidence of the reviews and corrective or preventive actions taken. Evidence may be spread sheets, notes, e-mails, or instruction changes.			3			
19	<b>Project Environmental, Safety, and Health Manager responsibilities - Project Level Program Management - Appendix A A.2.4.1</b>	Contractor must provide access to the positions descriptions, training, and certification requirements for Project Environmental, Safety, and Health Manager. Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Environmental, Safety, and Health Manager to manage the Environmental, Safety, and Health Program at the Project level. Outstanding: The position descriptions must include a list of core duties, as well as desired experience, training, and/or education. Positive statement in the manual that the Environmental, Safety, and Health Manager is not the same person responsible for job completion, such as the Foreman, Supervisor, or Project Manager.			3			
20	<b>Project Environmental, Safety, and Health Manager responsibilities - Ensure compliance with the Environmental, Safety, and Health Program - Appendix A A.2.4.5 &amp; A.2.4.6</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Environmental, Safety, and Health Manager to observe work practices, review inspection sheets, inventory, and any other data related to the Hazardous Waste Program at the Project level to verify employee and supervisor compliance with the Environmental, Safety, and Health Program. Outstanding: Evidence of robust process review and worksite practice observations including noted discrepancies and near misses, and corrective or preventive actions taken.			3			



Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
21	<b>Project Environmental, Safety, and Health Manager responsibilities - Worksite and Employee Monitoring - Appendix A A.2.4.5</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Environmental, Safety, and Health Manager to collect, schedule, and perform or manage required monitoring, such as personnel exposure related to PEL for toxic or hazardous elements, and employee health monitoring. Review data collected from the monitoring device sources and any other data related to the Environmental, Safety, and Health Program at the Project level. Take and document appropriate action when discrepancies are identified. Outstanding: Not possible for this element.			3			
22	<b>Project Environmental, Safety, and Health Manager responsibilities - Verify Employee Certifications - Appendix A A.2.4.6</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Project Environmental, Safety, and Health Manager to review, verify, and maintain applicable employee certifications required prior to assignment in a hazardous environment, or to an industrial worksite. Outstanding: Evidence of the corrective or preventive actions taken based on data review. Evidence may be spread sheets, notes, e-mails, or instruction changes.			3			
23	<b>Competent Person - Authority to Stop Work or Direct Clean Up Operations - Appendix A A.2.5</b>	Contractor must provide access to the positions descriptions, training, and certification requirements for Competent Person. Expected: Position descriptions for the above title, or equivalent personnel. Assignment and specific written authority in the position description for the Competent Person to take whatever actions are necessary to prevent or recover from potential injury, hazardous material or hazardous waste loss of control, containment breach or any other unplanned discrepant condition, including stopping work. Position description must be equivalent to the phrasing in Appendix A Paragraph A.2.5 of AS-2. Outstanding: The position descriptions must include a list of core duties, desired experience, training, and/or education. Positive statement in the manual that the Competent Person is not the same person responsible for job completion, such as the Foreman, Supervisor, or Project Manager.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
24	<b>Competent Person - Verify Containment and Ventilation - Appendix A A.2.5.2 &amp; A.2.5.3</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to verify containment integrity in accordance with the Project Specification, and ventilation system adequacy and efficiency, air exchanges, and thorough ventilation for the confined space. Outstanding: Not possible for this element.			3			
25	<b>Competent Person - Verify Personnel Training and Certification Prior To Assignment - Appendix A A.2.5.4</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to verify personnel training, medical monitoring, and certification prior to assignment in hazardous or industrial environments. Outstanding: Not possible for this element.			3			
26	<b>Competent Person - Verify Proper use of PPE by Personnel - Appendix A A.2.5.5 &amp; A.2.5.6</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to verify personnel properly use PPE and use proper suit up and unsuiting procedures. Outstanding: Not possible for this element.			3			
27	<b>Competent Person - Hazardous Waste Accumulation Area Inspection - Appendix A A.2.5.7</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to inspect, document, and direct corrective actions as needed at Hazardous Waste Accumulation Areas and Hazardous Material Storage Areas. Outstanding: Not possible for this element.			3			
28	<b>Competent Person - Manage and Report Worker Exposure Monitoring - Appendix A A.2.5.8</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to schedule, coordinate, manage, document, and report worker exposure monitoring. Outstanding: Electronic program that compiles data for easy analysis, reports discrepancies, and tracks corrective actions.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
29	<b>Competent Person - Reporting and Archiving all required data - Appendix A A.2.5.9</b>	Expected: Position descriptions for the above title, or equivalent personnel. Assignment in the position description for the Competent Person to accumulate, coordinate, manage, document, and report all required data collection for the position. Outstanding: Electronic program that compiles data for easy analysis, reports discrepancies, and tracks corrective actions.			3			
<b>Hazardous Waste Mgmt. Positions (Project) 7.2</b>				<b>Original Section Score:</b>				

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
<b>Other Functions and Requirements (7.2.5)</b>								

Assessment of other functions or requirements that must be assigned in the contractor's Hazardous Waste Management Manual.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
30	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.2.1.</b>	Contractor must provide access to the instructions or manuals that direct procedures, engineering controls, and personnel exposure monitoring related to employee health and safety. Expected: Manual must have a positive statement directing that all material to be removed is assumed to contain heavy metals until sampling proves otherwise. Outstanding: Not possible for this element.			3			
31	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.2.2.</b>	Expected: Manual must have a positive statement directing that engineering controls be used whenever practical to reduce employee exposure to hazardous materials, hazardous waste, and toxic environments. Outstanding: Direction for filtered exhaust ventilation and containments to reduce worker exposure to the lowest feasible level prior to depending upon respiratory controls.			3			
32	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.3.1</b>	Expected: Manual must direct employee exposure monitoring and recordkeeping is performed, and that employees are notified of monitoring results within 5 days of the contractor's receipt of the results. Outstanding: Not possible on this element.			3			
33	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.2.3</b>	Expected: Manual must direct employees to use appropriate PPE during work operations, and use proper suit up and unsuiting procedures. Outstanding: Not possible on this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
34	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.3.3.</b>	Expected: Manual must direct shower facilities be on site and functional prior to starting lead removal operations. Outstanding: Not possible on this element.			3			
35	<b>Procedures, Engineering Controls, and Monitoring - Personnel Safety and Health - 7.2.1.4.3.4.</b>	Expected: Manual must direct employees to use shower facilities during work operations, not wear street clothes during the work shift, use clean and dirty sides of the facility, and use proper suit up and unsuiting procedures. Outstanding: Not possible on this element.			3			
36	<b>Procedures, Engineering Controls, and Monitoring -Hazardous Waste Removal, Control, and Management - 7.2.1.4.4.3.</b>	Expected: Manual must direct employees to ensure containment of waste generated during work operations, clean up process related spills immediately or prior to end of shift as appropriate. Outstanding: Not possible on this element.			3			
37	<b>Procedures, Engineering Controls, and Monitoring -Hazardous Waste Removal, Control, and Management - 7.2.1.4.6.</b>	Expected: Manual must direct competent person or employees to inspect and document containment integrity during work operations and prior to end of shift as appropriate. Outstanding: Not possible on this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
38	<b>Procedures, Engineering Controls, and Monitoring -Environmental Controls - 7.2.1.4.5</b>	Expected: Manual must direct competent person or employees to document magnehelic gauge readings prior to starting work, during work operations, and prior to end of shift or as directed by the work specification when filtered exhaust ventilation is in use. Outstanding: Not possible on this element.			3			
39	<b>Procedures, Engineering Controls, and Monitoring -Environmental Controls - 7.2.1.4.5.</b>	Expected: Manual must direct actions to be taken and documentation required when magnehelic gauge readings are not within the required limits . Outstanding: Not possible on this element.			3			
40	<b>Environmental, Safety, and Health Training 7.2.1.2.</b>	Expected: Manual must require all personnel have been trained and certified in accordance with paragraph 7.3.3 and Appendix B of AS-2. Outstanding: Electronic database with the ability to retrieve certification by employee and certification title.			3			
<b>Other Functions and Requirements (7.2.5)</b>				<b>Original Section Score:</b>				

### Hazardous Waste Generation and Accumulation Requirements (7.2.5.5)

Assessment of direction for material management practices to reduce excess material, hazardous waste, and on-site inventory without affecting capability to perform work.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
41	<b>Container Compatible with Waste 7.2.1.7.1, 7.2.1.7.3, 7.2.1.7.6</b>	Expected: Manual must require that the hazardous waste container is compatible with the waste being accumulated, is in good condition, and that containers of incompatible waste are segregated to prevent unplanned reactions. Outstanding: Not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
42	<b>Closed Container 7.2.1.7.4.</b>	Expected: Manual must require that the hazardous waste container is closed unless waste is actively being added to the container. Spills and drips on the outside of the container must be cleaned up. Outstanding: Not possible for this element.			3			
43	<b>Secondary Containment for Hazardous Waste 7.2.1.7.6.</b>	Expected: Manual must require that the hazardous waste container is kept in a secondary containment to prevent waste from escaping when required. Examples include Accumulation Area adjoining a waterway, incompatible wastes accumulated in close proximity, or when directed by specification or higher level requirement. Unless otherwise specified, secondary containment may be temporary or of commercial design so long as it is protected from puncture or damage. Spills and drips on the outside of the container must be cleaned up. If there is no stated or clear requirement for secondary containment, this element is "N/A". Outstanding: Not possible for this element.			3			
44	<b>Spill Kits, Eye Wash Stations, and Fire Extinguishers 7.2.1.7.7.</b>	Expected: Manual must require that the hazardous waste accumulation area is equipped with spill kits and fire extinguishers appropriate for the type of waste being accumulated, and eye wash stations. Outstanding: Not possible for this element.			3			
45	<b>Secure Hazardous Waste Storage 7.2.1.7.8</b>	Expected: Manual must require that the hazardous waste accumulation area is secure when not in operation. Secure means a method of closure that does not allow entry, such as a fence or building with a lock on the access door or gate. Outstanding: Security alarm or video system that notifies local law enforcement or local responsible person in case of entry or vandalism.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
46	<b>Accumulation Area Inspection</b> 7.2.1.7.5	Expected: Manual must require that the hazardous waste accumulation area is inspected at least weekly unless a more stringent requirement is in place. Inspection criteria will include verifying all elements within this section and note corrective actions required and follow up. Outstanding: Electronic database for inspection results analysis and follow up.			3			
47	<b>Contact Information</b> 7.2.1.7.9.	Expected: Manual must require that the hazardous waste accumulation area is prominently posted with contact information for someone local in case of emergency. If no one is available locally the posting should state to call the contact listed on the posting then call 911. Outstanding: Not possible for this element.			3			
48	<b>Waste Shipped Within Required Timeframe</b> 7.2.1.8.	Expected: Manual must require that the hazardous waste accumulated is shipped within the required timeframes. Unless otherwise officially authorized by a regulatory authority time frames are consistent with subparagraphs 7.2.5.6.1 through 7.2.5.6.3 of AS-2. Outstanding: Not possible for this element.			3			
<b>Hazardous Waste Generation and Accumulation (7.2.5.5)</b>				<b>Original Section Score:</b>				



Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
<b>Documentation Requirements (7.2.6 to 7.2.8)</b>								
Assessment of hazardous waste management documentation required at the contractor's headquarters, at the worksite, and employee records that are required to ensure an employee is certified to perform the work assigned prior to exposure to the hazards.								
Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
49	<b>Technical Library with Access to CFR, State and Local Requirements 7.2.2.1</b>	Contractor must provide access to the technical library. The technical library must be available at the contractor's headquarters as well as the job site. Expected: Library may be electronic or hard copy; however, documents must be retrievable in a timely manner and will include applicable CFRs, state and local requirements. Outstanding: Technical library available electronically at the headquarters and on the job site, with the capability to print copies of applicable direction to take to the job site.			3			
50	<b>Technical Library with Access to CFR, State and Local Requirements 7.2.2.2, 7.1.1</b>	Expected: Library may be electronic or hard copy; however, documents must be retrievable in a timely manner. Documents will include contractor's internal documents including the Hazardous Waste Management Program Manual or instructions. The manual shall cover all aspects of the Hazardous Waste Management Program. The Hazardous Material Management Program and the Hazardous Waste Management Program must be coordinated to cover cradle to grave direction for the acquisition, storage, use, and disposal of hazardous materials used for cleaning, surface preparation, and coating/lining application as well as any hazardous waste generated during any of those processes. Outstanding: Technical library available electronically at the headquarters and on the job site, with the capability to print copies of applicable direction at the job site.			3			
51	<b>Project Specification 7.2.2.4</b>	Expected: Project specification may be electronic or hard copy; however, documents must be retrievable in a timely manner. The Project Specification must include any applicable references and drawings, and must include the latest changes. Outstanding: Not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
52	<b>Emergency Action Plan</b> 7.2.2.5	Expected: Emergency Action Plan must be available in hard copy and must be retrievable in a timely manner. The Emergency Action Plan must include a list by name for specific assignment of employees assigned to assist in evacuations. There must be adequate back up personnel on the list to ensure adequate assistance in case of absence or casualty. Outstanding: Includes provision for briefing local emergency responders about the operations, timeframes, potential hazardous materials, hazardous waste, and hazardous conditions on the job site and providing the emergency responders with a project phone list prior to starting work.			3			
53	<b>Archived Uniform Hazardous Waste Manifest</b> 7.2.2.6	Expected: Contractor is required to maintain a signed copy of the archived Uniform Hazardous Waste Manifest (EPA Form 8700-22 or 8700-22A) for each shipment of hazardous waste removed from the work site for 3 years. The contractor is required to obtain the signature of the transporter on the manifest. Once the shipment is received at a treatment facility the contractor should get a copy of the manifest with the treatment facility's signature. Outstanding: Electronic database for tracking waste shipped and manifests signed by the receiving facility.			3			
54	<b>Containers Labeled with "Hazardous Waste", start date, and name of contents</b> 7.2.3.1	Contractor is required to provide access to jobsite records and storage area. Expected: Contractor is required to label all containers prior to placing the first contents into the container. Each container must clearly be labeled with "Hazardous Waste", the start date based on 7.2.3.1. subparagraphs in AS-2, and the contents of the container. Outstanding: Electronic database for tracking waste accumulated, tracking through shipment.			3			
55	<b>Accumulation Area Inspection Reports with Corrective Actions</b> 7.2.3.2	Contractor is required to perform Accumulation Area inspections at least weekly. Expected: Contractor provide access to Accumulation Area inspection reports including required and completed corrective actions. Outstanding: Electronic database for tracking Accumulation Area inspections and corrective actions for process improvement analysis.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
56	<b>Hazardous Waste Inventory</b> 7.2.3.3	Contractor is required to provide an inventory of accumulated hazardous waste to ensure timely shipment once the maximum quantity of waste is generated or prior to exceeding an accumulation date in a 90 or 180 Day Area . Expected: Contractor provide access to Accumulation Area inventory reports including start dates and shipment dates. Outstanding: Electronic database for tracking Accumulation Area inventory and corrective actions for process improvement analysis.			3			
57	<b>List of Certified Employees</b> 7.2.4.1	Contractor is required to provide access to records and documents. Expected: Contractor provide access to the list of Certified Employees for positions listed in Table 1 of AS-2. List should include recertification date, information on medical monitoring recertification as well as training recertification. List is required to be on the job site. Outstanding: Electronic database with reminders when training or medical monitoring is required.			3			
58	<b>List of Respirator Certified Employees</b> 7.2.4.2	Expected: Contractor provide access to the list of Respirator Certified Employees including respirator size and type. List should include recertification date, information on medical monitoring recertification as well as training recertification. List is required to be on the job site. Outstanding: Electronic database with reminders when training or medical monitoring is required.			3			
59	<b>List of Employees Certified for Special Skills</b> 7.2.4.3	Expected: Contractor provide access to the list of employees certified for special skills including Confined Space Entry, Manlift Driver, Fall Protection and any special tools certifications needed. List should include recertification date, information on medical monitoring recertification as well as training recertification. List is required to be on the job site. Outstanding: Electronic database with reminders when training or medical monitoring is required.			3			
<b>Documentation Requirements (7.2.6 to 7.2.8)</b>			<b>Original Section Score:</b>					

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
Required Skills, Proficiencies, and Training (7.3)								

Assessment of the implementation of the contractor's OSHA and EPA mandated training program, which may be delivered internally, by a third party through a commercially available program, or a combination of in house and commercially available training. OSHA does not specify the details of the training requirements; however, there are specific subjects and hours required. NIICAP does not address the specifics within a training program; however, NIICAP will verify that the training program presented covers the required subjects and complies with the required number of training hours.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
60	<b>Certification Prior to Job Assignment</b> 7.3.2.1	Contractor is required to provide access to records and documents. Expected: Contractor provide access to documents showing the initial Certification Date for employees in the positions listed in Table 1 of AS-2. Contractor provide evidence of the initial assignment to perform work requiring the certifications. List should include recertification date, information on medical monitoring recertification as well as training recertification. List is required to be on the job site. Auditor will select random names from the contractor's employee listing. Outstanding: Electronic database with reminders when training or medical monitoring is required.			3			
61	<b>OSHA and RCRA Training Plan Requirements</b> 7.3.3.2.1	Contractor must provide evidence of an ongoing evaluation of the hazards and the training provided to ensure the training addresses the hazards on the job site. Expected: Evidence of ongoing or routine surveillances, audits, inspections and the reports developed based on the findings. Additionally the contractor must provide evidence of review, and analysis of the reports resulting in training, briefing, and process changes. Outstanding: Historical records of audits, surveillances, reports, corrective actions, and incorporation into the lesson plans.			3			
62	<b>Training Plans and Lesson Plans</b> 7.3.3.1	Expected: List of all subject matter listed in Table 1 of AS-2, including a list of methods the contractor delivers the training. Lesson Plans and Training Plans for any in house environmental, safety, and health training provided. Outstanding: Historical records of audits, surveillances, reports, corrective actions, and incorporation into the lesson plans.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
63	<b>Training Plans and Lesson Plans for Basic Employee</b> 7.3.3.1 & 7.3.3.2	Expected: Lesson Plans (for in house training) and Training Plans for basic environmental, safety, and health training necessary for all employees prior to initial assignment. Outstanding: Not possible for this element.			3			
64	<b>Tracking System for Employee Training and Certification</b> 7.3.3.2.3	Expected: Tracking system covering Training Elements completed by the employee, Right to Know Training, Certifications related to required training, and Skills Testing completed by the employee including test scores, observations, and approvals as appropriate. Outstanding: Electronic database with reminders when training or medical monitoring is required.			3			
65	<b>Periodic Training Review</b> 7.3.3.2.4	Expected: Evidence of a review process for in house surveillances, audits, training plans, test results and other data to determine if the training program is effective. Evidence consists of reports, spread sheets, memos, or direction for changes in the lesson plan. Outstanding: Electronic database tracking reviews and trends resulting in training changes.			3			
<b>Required Skills, Proficiencies, and Training (7.3)</b>			<b>Original Section Score:</b>					



## AS-2 Hazardous Waste Removal and Management - Technical Capabilities and Jobsite Practices Audit Score

Attribute Ratings: 1 = Unsatisfactory, 2 = Poor or Weakness, 3 = Satisfactory, 4 = Better than Average, 5 = Outstanding

### Technical Capabilities (Work Practices) (7.4)

Assessment of contractor's work practices and adherence to the management program elements previously verified during this assessment. Jobsite assessment will include observation of work, observation of inspection check points, observation of equipment and operators, and review of documents and document availability on the work site. Regardless of scores on the other sections, the score for this section must average to 3.0 for a passing score.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
66	<b>Waste Characterization 7.4.2.1</b>	Contractor must demonstrate methods used to characterize waste to determine if it should be controlled as hazardous waste. Expected: Contractor documentation regarding sampling and testing, or characterization based on listing as either an excluded waste, or a hazardous waste. Acceptable methods for characterization include: Listing as an excluded waste, listing as a hazardous waste, or determining hazardous characteristics by standardized testing, or previous characterization within the last 12 months. Outstanding: Not possible for this element.			3			
67	<b>Containment and Ventilation - Magnehelic Gauge Reading - 7.4.3.2.2</b>	Expected: Contractor must demonstrate methods used to meet the containment requirements of the specification. Verify and document containment class required by the specification. Auditor will determine if the filtered ventilation is working correctly. Review contractor's or manufacturer's directions for reading the magnehelic gauge. Review the air quality permit if applicable. Determine if the magnehelic gauge reading is within specification. Outstanding: Not possible for this element.			3			
68	<b>Containment and Ventilation - Magnehelic Gauge Reading Log - 7.4.3.2.2</b>	Expected: Auditor will determine if the magnehelic gauge readings have been recorded as required. Review Magnehelic Gauge Reading Log. Check for frequency and readings within specification. Outstanding: Not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
69	<b>Containment and Ventilation - Containment Integrity and Negative Ventilation - 7.4.3.3</b>	Expected: Auditor will determine if the containment has negative ventilation. Observe the containment tarps and seams of the containment tarps. Determine if there are rips, gaps, open areas, and if dust is escaping (unacceptable). Determine if tarps are sucked in toward the containment (required) or bulging out (unacceptable). Outstanding: Not possible for this element.			3			
70	<b>Containment and Ventilation - Leakage or Spills and Recovery Actions - 7.4.3.3.4</b>	Expected: Auditor will determine if abrasive grit, liquid, or waste material has escaped the containment. Observe the seams and openings of the containment tarps. Determine if there are gaps, and if grit, liquid, or dust is escaping. Determine if recovery actions taken when a leak or spill is discovered are consistent with specification requirement and the Compliance Plan. Outstanding: Not possible for this element.			3			
71	<b>Suit up and Un-suiting Vestibules - 7.4.3.4</b>	Expected: Auditor will determine if the containment has entry and exit vestibules (may be one if there is a clean and dirty side). Vestibule should have receptacles for dirty coveralls and waste. Outstanding: Not possible for this element.			3			
72	<b>Suit up and Un-suiting Vestibules - 7.4.3.4</b>	Expected: Functional HEPA vacuum to vacuum excessive dust from PPE prior to removal. Outstanding: Not possible for this element.			3			
73	<b>Operable Shower Facility - Clean and Dirty Sides - 7.4.6.1 through 7.4.6.3</b>	Expected: Shower facility has a clean side with lockers for street clothes, and a dirty side with lockers for work clothes. Access between the clean and dirty sides must require transit of the shower. Outstanding: not possible for this element.			3			
74	<b>Operable Shower Facility - Functional Waste Water Collection System - 7.4.6.4</b>	Expected: Shower facility has a functional waste water collection system. Outstanding: not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
75	<b>Operable Shower Facility - Functional Fresh Water Supply System - 7.4.6.5</b>	Expected: Shower facility has a functional fresh water supply system with hot and cold water. Outstanding: not possible for this element.			3			
76	<b>Operable Shower Facility - Functional Water Heater and Ambient Air System - 7.4.6.6</b>	Expected: Shower facility has a functional water heater and ambient air heat/cooling system as appropriate. Outstanding: not possible for this element. NOTE: AC NOT REQUIRED IF INTERIOR TEMPERATURE IS LESS THAN 105 DEGREES.			3			
77	<b>Safe Accumulation and Storage of Hazardous Waste - Accumulation Time Limits - 7.4.7.1</b>	Auditor will determine the type of Accumulation Area, and the applicable time limits based on discussion with the contractor verified by review of the specification, Compliance Plan, or Hazardous Waste Management Manual. Expected: Contractor identifies the type of Accumulation Area, the applicable time limits and accumulation quantity limits. Verify limits with Appendix C of AS-2. Verify compliance with applicable limits. Outstanding: Not possible for this element.			3			
78	<b>Safe Accumulation and Storage of Hazardous Waste - Written Policy being followed - 7.4.7.2</b>	Auditor will review the Hazardous Waste Management Plan, specification, and site compliance plan. Compare the directed practices to those observed. Expected: Contractor work practices and documentation practices are consistent with the written direction. Outstanding: Not possible for this element.			3			
79	<b>Safe Accumulation and Storage of Hazardous Waste - Written Policy being followed - 7.4.7.2</b>	Auditor will review the Hazardous Waste Management Plan, specification, and site plan. Compare the directed practices to those observed. Expected: Contractor inspection, labeling, and shipping practices are consistent with the written direction. Outstanding: Not possible for this element.			3			



Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
80	<b>Safe Accumulation and Storage of Hazardous Waste - Compatible Containers - 7.4.7.3</b>	Expected: Containers for hazardous waste are in good condition and compatible with the waste being stored in them. Outstanding: Not possible for this element.			3			
81	<b>Safe Accumulation and Storage of Hazardous Waste - Emergency Eye wash station and fire extinguisher - 7.4.7.4</b>	Expected: 7.4.7.4. Emergency eye wash station and fire extinguisher compatible with the waste stored in the accumulation area are close to the accumulation area and functional. Outstanding: Not possible for this element.			3			
82	<b>Safe Accumulation and Storage of Hazardous Waste - Waste Labeling - 7.4.7.5</b>	Expected: All waste is labeled on the day of first accumulation with the following: "Hazardous Waste" must be clearly labeled on the container, and name of waste in the container. Outstanding: Not possible for this element.			3			
83	<b>Safe Accumulation and Storage of Hazardous Waste - Date Labeling - 7.4.7.6</b>	Three different requirements apply. Expected: (1) In a Satellite Accumulation Area waste exceeding 55 gallons is labeled with the current date. (2) All waste moved from a Satellite Accumulation Area is labeled again with the current date on the day it enters a 90-Day or 180-Day Accumulation Area. (3) All waste accumulated in a 90-Day or 180-Day Accumulation Area is dated the day of first accumulation. Outstanding: Not possible for this element.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
84	<b>Safe Accumulation and Storage of Hazardous Waste - Timely Transfer of Waste - 7.4.7.6</b>	Two different requirements apply. Expected: (1) All waste is transferred from a Satellite Accumulation Area to a 90-Day or 180-Day Accumulation Area within 3 days of the date on the container. (2) All waste is transferred from the 90-Day or 180-Day Accumulation Area within 90 or 180 days of the date on the container, as applicable. Outstanding: Not possible for this element.			3			
85	<b>Safe Accumulation and Storage of Hazardous Waste - Timely Transfer of Waste - 7.4.7.7</b>	Expected: Accumulation Area inventory sheets with start dates for the 90-Day or 180-Day Accumulation Area to track hazardous waste and ensure that the waste is shipped within 90 or 180 days as applicable. Outstanding: Not possible for this element.			3			
<b>Technical Capabilities (Work Practices) (7.4)</b>				<b>Original Section Score:</b>				

**Technical Capabilities (Documentation) (7.4)**

Assessment of contractor's work practices and adherence to the management program elements previously verified during this assessment. Jobsite assessment will include observation of work, observation of inspection check points, observation of equipment and operators, and review of documents and document availability on the work site. Regardless of scores on the other sections, the score for this section must average to 3.0 for a passing score.

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
86	<b>Technical Library with Access to CFR, State and Local Requirements 7.2.2.1, and 7.1.1</b>	Expected: Library may be electronic or hard copy; however, documents must be retrievable in a timely manner. Documents will include contractor's internal documents including the Hazardous Waste Management Program Manual or instructions. The manual shall cover all aspects of the Hazardous Waste Management Program. The Hazardous Material Management Program and the Hazardous Waste Management Program must be coordinated to cover cradle to grave direction for the acquisition, storage, use, and disposal of hazardous materials used for cleaning, surface preparation, and coating/lining application as well as any hazardous waste generated during any of those processes. Outstanding: Technical library available electronically at the headquarters and on the job site, with the capability to print copies of applicable direction at the job site.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
87	<b>Project Specification 7.2.2.4</b>	Expected: Project specification may be electronic or hard copy; however, documents must be retrievable in a timely manner. The Project Specification must include any applicable references and drawings, and must include the latest changes. Outstanding: Not possible for this element.			3			
88	<b>Emergency Action Plan 7.2.2.5</b>	Expected: Emergency Action Plan must be available in hard copy and must be retrievable in a timely manner. The Emergency Action Plan must include a list by name for specific assignment of employees assigned to assist in evacuations. There must be adequate back up personnel on the list to ensure adequate assistance in case of absence or casualty. Outstanding: Not possible for this element.			3			
89	<b>Jobsite Documentation - Environmental Monitoring and Inspections - 7.4.8.2</b>	Contractor must provide access to records generated on the jobsite. Expected: Documentation of environmental monitoring and inspections. Records should include data sheets and reports from environmental monitoring, spill reports, discrepancy reports and recovery actions, containment inspection data, and shower facility inspections. Outstanding: Electronic database with analysis and trend reporting to Project and corporate Environmental, Health and Safety Managers.			3			
90	<b>Jobsite Documentation - Accumulation Area Inspections and Corrective Actions - 7.4.8.2.2</b>	Expected: Documentation of 90-Day or 180-Day Accumulation Area inspections. Records should include inspection reports for the 90 or 180-Day Accumulation areas, discrepancy reports and recovery actions, and secondary containment inspection data. Outstanding: Routine inspections of Satellite Accumulation Areas included in site plan. Electronic database with analysis and trend reporting to Project and corporate Environmental, Health and Safety Managers. NOTE: SPECIFIC INSPECTIONS FOR SATELLITE ACCUMULATION AREAS ARE NOT REQUIRED; HOWEVER, THE CONTAINERS MUST BE IN GOOD CONDITION, COMPATIBLE WITH THE WASTE, AND UNDER THE PROCESS OPERATOR'S CONTROL.			3			
91	<b>Jobsite Documentation - Personnel Exposure Monitoring - 7.4.8.2.3</b>	Expected: Documentation of employee exposure monitoring. Records should include monitoring plan and schedule, monitoring data, monitoring reports and analysis verifying that administrative controls, engineering controls, PPE and respiratory protection are adequate for the actual exposure encountered. Evidence that employees have been advised of the monitoring results within 5 days of receiving the results. Outstanding: Electronic database with analysis and trend reporting to Project and corporate Environmental, Health and Safety Managers. NOTE: Auditor is looking for the existence of these items, not analyzing them for compliance.			3			

Item	Attribute	Description	Comments	Rated Value	Expected Value	Major Finding	Minor Finding	Observation
92	<b>Jobsite Documentation - Safety Inspections - 7.4.8.2.4</b>	Expected: Documentation of safety inspections conducted on the jobsite, in the containments, at accumulation areas, eating and restroom facilities, and storage areas. Records should include inspection plan and schedule, inspection data, inspection reports and analysis verifying that control methods, engineering controls, PPE and respiratory protection are used as directed and adequate for the actual exposure encountered. Outstanding: Electronic database with analysis and trend reporting to Project and corporate Environmental, Health and Safety Managers.			3			
93	<b>Jobsite Documentation - Discrepancy Corrective Actions - 7.4.8.2.5</b>	This element applies to all of the monitoring, inspections, and other actions for all elements in this section. Documentation may have been verified in the other elements. Expected: Documentation of any discrepancies identified during any of the actions required by the other elements in this section. Data must include corrective and preventive actions as appropriate. In some cases corrective action is adequate. Outstanding: Addressed in other elements; therefore, not possible for this element.			3			
94	<b>Jobsite Documentation - List of Certified Employees - 7.4.8.5</b>	Expected: Contractor provide a list of employees certified for each of the positions in Table 1 including certification date and recertification date. Contractor provide assignment sheets for days selected by the Auditor. Auditor verify that the employee certifications were current when the employees were assigned to a job. Outstanding: Evidence that the certification sheet is checked routinely, or another effective method is used and documented to ensure employee certifications are current when assigned work.			3			
95	<b>Jobsite Documentation - Uniform Hazardous Waste Manifest - 7.4.8.6.1</b>	Expected: Contractor provide a signed copy of the Uniform Hazardous Waste Manifest for any shipments that have not yet been archived. Outstanding: Not possible for this element.			3			
<b>Technical Capabilities (Documentation) (7.4)</b>			<b>Original Section Score:</b>					