

AUGUST 2, 2022



DANGEROUS WASTE MANAGEMENT PLAN

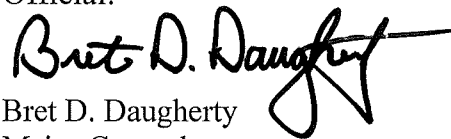
JOINT FORCE HEADQUARTERS
WASHINGTON MILITARY DEPARTMENT
Camp Murray

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Tacoma, Washington 98430-5000
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DANGEROUS WASTE MANAGEMENT PLAN

By Order of the Adjutant General:

Official:



Bret D. Daugherty
Major General
The Adjutant General and
Commander, Washington National Guard

History. This printing is the fourth publication of this document. Original publication date July 23, 2002, revised May 15, 2012, second revision June 22, 2021, third revision August 2, 2022.

Summary. This plan provides policy and procedures for the proper management of dangerous waste in the Washington Military Department (WMD) and supersedes Washington Army National Guard (WAARNG) Pamphlet 200-1, dated May 15, 2012. ***If conflict exists between procedures outlined in this plan and those of applicable federal, state, and local law or regulation, the latter will take precedence for compliance.***

Applicability. This Dangerous Waste Management Plan (DWMP) applies to all state and federal civilian employees of the WMD and all members of the Washington National Guard ***and any contractors, consultants, or volunteers working on their behalf.***

Proponent and exception authority. The proponent for this publication is the WMD Environmental Programs Office (EPO).

Suggested improvements. Please send comments and suggested improvements to ATTN: Washington Military Department, Environmental Programs Office, 36 Quartermaster Road, Camp Murray, WA 98430-5080 or email us at env@mil.wa.gov.

Distribution: A

Summary of Changes

August 2, 2022

Entirety	Reviewed and updated language for specificity and clarity.
Entirety	Edited punctuation and wording for proper grammar.
Entirety	Removed color from text to assist colorblind individuals.
Entirety	Updated contact information.
Ch4	Added requirement to store containers away from ignition sources.
Ch4	Added requirement to test or inspect emergency equipment monthly.
App. A	Removed metal containers from approved list for Calcium Hypochlorite.
App. A	Removed exception allowing fluorescent bulbs for solid waste disposal.
App. A	Added requirement to activate MRE heaters prior to solid waste disposal.
App. A	Removed duplicate PD-680 (I/II) profile (deleted page).
App. A	Added profile for PCB containing ballasts.
App. A	Redefined weapon cleaning debris as hazardous waste
App. A	Require intact NVI tubes turned in to USPFO for demilitarization.
App. A	Specified appropriate DOT hazard class labels for each profile.
App. A	Updated graphics for properly labeled waste containers.
App. H	Added SOP to serve as stand-alone guidance for managing Universal Waste.

June 22, 2021

Entirety	Reviewed and updated acronyms and references (06/22/21)
Ch 4, Ch 6	Updated weekly inspection checklist (06/22/2021).

May 15, 2012 (and Prior)

Ch 3	Revised Chapter 3 for clarity.
Ch 4, Ch 6	Revised weekly inspection requirement for dangerous waste accumulation areas. Replaced multi-page checklist with a one-page checklist (10/31/12).
Appendix D	Revised Appendix D, Pharmaceutical Waste Management (10/31/12).

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Chapter 1 - Introduction

Purpose and Scope

This plan documents the Washington Military Department (WMD) dangerous waste (DW) management program by prescribing policies and procedures for the proper accumulation and handling of DWs. This plan also addresses some non-dangerous and unknown wastes requiring special management, and some hazardous material related issues as they pertain to waste minimization. It is written to ensure WMD compliance with all federal, state, and local laws and regulations.

The contents of this document are consistent with the agency's Environmental Policy (Unified WMD and National Guard Policy No. 10-03). This plan also supports the WMD Environmental Management System (EMS), which is a formal, documented approach for addressing environmental aspects of WMD operations and activities such as DW generation.

Applicability

Guidance in the plan applies to all WMD activities that generate or have the potential to generate DW. This includes all organizations (military, civilian, contractor, tenant) operating on property owned or operated by the WMD, except the Washington Air National Guard (WAANG).

The WAANG will implement the environmental policies and procedures of their major command. The WAANG maintains its own Hazardous Waste Management Plan, which includes internal compliance procedures applicable to their organization.

Key Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) provides "cradle to grave" authority to the Environmental Protection Agency (EPA) to control hazardous waste (HW) from generation to ultimate disposal. RCRA regulates five kinds of HW management activities: generation, storage, transportation, treatment, and disposal. Title 40 of the Code of Federal Regulations (40 CFR), Protection of the Environment, includes the federal regulations applicable to all aspects of managing HW under the provisions of RCRA.

Washington Administrative Code (WAC) Chapter 173-303, DW Regulations, contains the Washington State regulations that implement RCRA Subtitle C and the State Hazardous Waste Management Act of 1976 as amended. The State has authority from EPA to regulate HW management under the provisions of RCRA.

Language Note: Washington State uses the term “dangerous waste” in lieu of “hazardous waste” as defined in WAC 173- 303-040. The term “hazardous waste” only includes those wastes regulated by federal hazardous waste regulations (RCRA), while “dangerous waste” includes both hazardous waste and Washington “State-Only” dangerous wastes. These terms are discussed further in Chapter 3 of this plan.

The Federal Facility Compliance Act (FFCA) of 1992 amends the solid and HW provisions of RCRA. It waives previous federal sovereign immunity under RCRA and allows state, county and local governments to impose substantive and procedural requirements; require payment of service charges, including fees; and to impose fines and penalties on federal facilities for violations of their solid and HW laws.

Army Regulation 200-1, *Environmental Protection and Enhancement* requires a written installation Hazardous Waste Management Plan that defines responsibilities and procedures for the management of HW.

Punitive Action

Violation of many of the requirements in this plan is punishable under federal, state, or local law. Regulatory agencies may take the following actions if they discover violations of the DW regulations:

- Issue a warning letter, such as a Notice of Violation (NOV)
- Issue an administrative order
- Assess an administrative penalty
- Revoke or modify a permit
- Take action in civil court
- Institute a criminal investigation

Military personnel are also subject to punitive action under the Uniform Code of Military Justice, and civilian personnel to disciplinary action within civilian personnel policies.

Reviews and Revisions

The WMD Environmental Programs Office (EPO) is the proponent for reviewing and modifying this document as requirements or regulations warrant. Please direct all questions or recommendations to the WMD EPO, Building 36, Camp Murray, Washington, 253-512-8464 or env@mil.wa.gov.

Chapter 2 – Responsibilities

Overview of Dangerous Waste Management Responsibilities

The Adjutant General (TAG), as director of Washington Military Department (WMD), is ultimately responsible for ensuring WMD compliance with federal, state and other applicable laws and regulations. However, operational responsibility for DW management rests with the individuals who generate, store, transport and dispose of the waste, or respond to incidents involving such waste. This chapter provides an overview of organizational responsibilities related to DW management.

The WMD EPO will:

- Serve as the point of contact for federal, state and local agencies for environmental matters, including DW management.
- Provide guidance on policy and procedures related to DW management.
- Assess WMD compliance with DW regulations.
- Manage and execute the internal Environmental Performance Assessment System (EPAS) process.
- Perform required budgeting actions in support of DW management in accordance with (IAW) the Army National Guard Environmental Division (ARNG-ILE) Program Guidance.
- Assist program managers and military trainers in assessing potential environmental impacts of planned activities.
- and provide technical assistance for meeting environmental compliance requirements.
- Schedule and ensure Environmental Compliance Officer (ECO) training is provided IAW Chapter 7 of this plan.
- Provide additional DW training and technical assistance to units and activities as needed or requested.
- Obtain waste data from WMD facilities and submit environmental reports as required.
- Retain DW records and files (e.g., manifest copies, test results, inspection reports) for audit purposes.
- Ensure site-specific Installation Contingency/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plans are updated every five years.
- Monitor contractor operations that involve DW handling and/or generation.

Unit Commanders, Directorate Chiefs, Activity Supervisors located on WMD property will:

- Ensure operations involving the generation of DW comply with appropriate regulations and procedures in this plan.
- Appoint in writing one Primary ECO and one Alternate ECO. The ECO will serve as the single point of contact in the unit/activity for environmental matters, including DW management.
- Ensure the ECO, senior personnel, and all other individuals who handle DW have received the proper training (Chapter 7).
- Ensure all Petroleum, Oil, and Lubricant (POL), HM and DWs are inventoried, managed, handled, and disposed of IAW federal, state, and local regulations.
- Ensure all spills are reported immediately to the Environmental Program Office Spill Coordinator at (253) 355-4364, or if unable to speak to the Spill Coordinator in person within 30 minutes, to the Joint Operations Center (JOC) on Camp Murray (253-512-8773 or 888-276-4362) and that response procedures are followed as outlined in Appendix B.
- Ensure appropriate access is provided to all storage areas, lockers, CONEXs, etc. in the event of an environmental compliance inspection by a federal or state regulator or internal or external EPAS inspection team.
- Ensure that environmental records are maintained IAW Chapter 6 and accessible to inspectors on site (inspection logs, training records, DW manifests, etc.).
- Notify the WMD EPO (253-512-8464) of any changes in personnel or shop processes such as equipment or chemical use. Submit requests to ensure all wastes are evaluated and that DW is properly classified.
- Ensure units/activities contact the maintenance activity that supports them to schedule a Defense Logistics Agency Disposition Services (DLA DS) pickup for DW turn-in.

G4 Maintenance will

- Ensure operations at WAARNG vehicle maintenance facilities (FMSs, Unit Training Equipment Site (UTES), the Mobilization and Training Equipment Site (MATES), and the Combined Support Maintenance Shop (CSMS)) comply with appropriate regulations and procedures in this plan.
- Appoint in writing one Primary ECO and one Alternate ECO. The ECO may or may not be the designated Material Handler & Identifier. The ECO (assisted by the Material Handler & Identifier) will serve as the single point of contact in the unit/activity for environmental matters, including DW management.
- Ensure all personnel performing duties that may affect environmental compliance with DW requirements have adequate knowledge and skills to perform their jobs.
- Ensure responsibilities related to DW management are clearly assigned and understood at the shop level.

- Maintain an accurate and current inventory of hazardous materials and DWs and send them to the WMD EPO monthly or as requested.
- Ensure weekly inspections of DW accumulation areas are performed and documented.
- Ensure adequate funding for DW management supplies such as safety equipment and spill kits for DW accumulation areas.
- Ensure that environmental records are maintained IAW Chapter 6 and accessible to inspectors on site (inspection logs, training records, DW manifests, etc.).
- Contact the support maintenance activity and/or United States Property & Fiscal Office (USPFO) Warehouse to schedule a DLA DS pickup when accumulated DW must be turned-in, or when hazardous material that has exceeded its useable shelf life becomes DW and must be disposed of as a DW.
- Ensure all spills are reported immediately to the EPO Spill Coordinator at (253) 355-4364, or if unable to speak to the Spill Coordinator in person within 30 minutes, to the JOC on Camp Murray (253-512-8773 or 888-276-4362) and that response procedures are followed as outlined in Appendix B.

State Maintenance will:

- Ensure in-house projects involving the generation of DW comply with appropriate regulations and procedures in this plan.
- Appoint in writing one Primary ECO and one Alternate ECO. The ECO will serve as the single point for environmental matters, including DW management.
- Ensure all personnel performing duties that may affect environmental compliance with DW requirements have adequate knowledge and skills to perform their jobs.
- Ensure responsibilities related to DW management are clearly assigned and understood at the shop level.
- Maintain an accurate and current inventory of HM and DWs and send them to the WMD EPO monthly or as requested.
- Ensure weekly inspections of DW accumulation areas are performed and documented.
- Ensure DW is consolidated at the facility where it was generated for disposition through federal channels.
- Ensure all spills are reported immediately to the EPO Spill Coordinator at (253) 355-4364, or if unable to speak to the Spill Coordinator in person within 30 minutes, to the JOC on Camp Murray (253-512-8773 or 888-276-4362) and that response procedures are followed as outlined in Appendix B.

G4 Logistics will:

- Serve as the staff proponent for compliance with U.S. Department of Transportation (DOT) requirements associated with transporting HAZMAT.

- Track Ammo 62 and Ammo 67 training records for WAARNG personnel and provide them to the WMD EPO as requested.

G3 (Operations and Training) will:

- Ensure environmental considerations such as DW management are accounted for when approving training plans.
- Coordinate with the WMD EPO to ensure ECO training dates are incorporated into the yearly training calendar.
- Coordinate with the WMD EPO to ensure Environmental Awareness is included as an annual training (AT) brief requirement at the unit level.

The United States Property & Fiscal Office (USPFO) will:

- Ensure operations involving the generation of DW comply with appropriate regulations and procedures in this plan.
- Appoint in writing one Primary ECO and one Alternate ECO. The ECO may or may not be the designated Material Handler & Identifier. The ECO (assisted by the Material Handler & Identifier) will serve as the single point of contact in the unit/activity for environmental matters, including DW management.
- Serve as the primary Point of Contact (POC) for interaction with the Defense Reutilization and Marketing Office (DLA DS).
- Assist and coordinate budgeting and contract requirements for environmental programs and projects related to DW management.
- Ensure proper accumulation of pharmaceutical DWs and only controlled substances and viable pharmaceuticals are returned to the CL VIII Warehouse on Ft. Lewis.

The Safety Office (Federal and State) will:

- Provide expertise in complying with safety requirements related to federal, state and local environmental regulations.
- Coordinate with the WMD EPO regarding environmental issues discovered during safety inspections
- Establish policies and procedures for local implementation of the Hazard Communication Program.
- Serve as the point of contact with safety and occupational health agencies, i.e., Occupational Safety and Health Administration (OSHA).

Medical Command (MEDCOM) will:

- Advocate proper management of Regulated Medical Waste (infectious wastes, sharps, etc.).

- Coordinate with the WMD EPO to ensure proper management of pharmaceutical DW.
- Provide adequate training for personnel required to handle Regulated Medical Waste and pharmaceutical DWs.
- Ensure all personnel who work with DW are appropriately trained.
- Appoint in writing one Primary ECO and one Alternate ECO. The ECO will serve as the single point of contact in the unit/activity for environmental matters, including DW management.

Environmental Compliance Officers (ECOs):

A Primary and Alternate ECO will be appointed in each military unit from the brigade through company/battery/troop level and in each civilian organization. The ECO will serve as the single point of contact in the unit/activity for environmental matters, including DW management. ECOs will:

- Coordinate between unit/activity and the WMD EPO.
- Advise the unit/activity on environmental compliance during training, operations, and logistics functions.
- Assess unit/activity compliance with DW requirements.
- Conduct and record environmental awareness and spill response training for their unit/activity annually.
- Pick up spill kits prior to training events.
- Maintain the Environmental Recordkeeping Binder (Chapter 6).
- Incorporate environmental responsibilities related to DW management into unit/activity standard operating procedures (SOPs) as appropriate. (Refer to Field Manual 3-34.5 for an example)

Units/activities will provide one copy each of ECO Duty Appointment letters to: Camp Murray, Attn: Environmental Programs Office, and to their supporting maintenance facility. A roster of trained ECOs is maintained by the EPO.

WAARNG Units/Activities located on Federal Installations (except MATES):

- Comply with the Federal Installation's procedures for managing DW. The Federal Installation, also referred to as the "host installation," establishes DW management SOPs for all WAARNG units and activities operating on that installation.
- Coordinate with the applicable Environmental Office (Joint Base Lewis McChord (JBLM), Yakima Training Center (YTC), and Fairchild Air Force Base (FAFB)) to ensure compliance and understanding of local requirements. Environmental orientations are required at most facilities for select personnel and ECOs prior to any operations.
- Conduct incident response and reporting IAW the Federal Installation's procedures. A Situation Report (SITREP) followed by copies of the required installation reports will be

forwarded through routine WAARNG incident reporting channels (with the notice “reported through Federal Facility channels” to eliminate dual reporting).

- Comply with the host installation’s environmental compliance inspections and evaluations. A courtesy copy of all environmental-related inspections/evaluations performed by the host installation will be sent through G4M to the WMD EPO on Camp Murray for situational awareness.
- Report waste generation IAW the host installation’s requirements. Annual DW reports will be completed by the host installation’s Environmental Office. WAARNG units operating on Federal Installations will provide waste reports to G4M and the WMD EPO for situational awareness.

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Chapter 3 - Identifying Dangerous Waste and Generator Status

The WMD generates a variety of DWs as the result of hazardous chemical usage while performing maintenance and other mission critical tasks. These wastes are considered dangerous because they possess certain hazardous properties, such as ignitability, corrosivity, reactivity and toxicity. Each type of DW has different management standards that apply based on its ability to cause harm to human health or the environment.

Dangerous Waste Determination

IAW the Washington DW Regulations (WAC 173-303), generators of any solid waste must determine if their waste is a DW before discarding it. A solid waste is any solid, liquid or gas that is not exempt under regulation. For the purposes of this plan nothing is exempt. All wastes must be properly characterized to determine if it is a DW.

A DW is a solid, liquid, or gaseous waste that poses significant harm to human health and the environment. As used in this plan, the term “dangerous waste” refers to the full spectrum of wastes regulated by the EPA, Washington Department of Ecology (WDOE), and local municipalities.

Categories of Dangerous Waste

There are three categories of DW which are described below: Listed Waste, Characteristic Waste, and State Criteria Waste.

There are also two smaller subsets of DW, "Extremely Hazardous Wastes" and "Acutely Hazardous Wastes," which have special regulations attached to them.

- **Listed Waste** – the waste or components of the waste appears on one of four lists in the DW Regulations. The lists are as follows:
 - ✓ P Listed Wastes – Discarded commercial chemical products (unused) that are acutely hazardous (e.g., P029 - Copper Cyanide).
 - ✓ U Listed Wastes – Discarded commercial chemical products (unused) that are hazardous, but not acutely hazardous (e.g., U002 - Acetone).
 - ✓ F Listed Wastes – DWs from non-specific sources (e.g., F001 - Spent halogenated solvents used in degreasing).
 - ✓ K Listed Wastes – DWs from specific sources (e.g., K052 - Leaded-tank bottoms from the petroleum refining industry).

- **Characteristic Waste** – the waste exhibits one or more of the hazardous characteristics below (refer to WAC 173-303-090 for full descriptions).
 - ✓ Ignitability (D001) – The waste, if a liquid, has a flashpoint of 140 degrees Fahrenheit or less. If a solid, the waste will ignite and burn vigorously through friction, absorption of moisture or spontaneous chemical changes.
 - ✓ Corrosivity (D002) – The waste, if a liquid, has a pH less than or equal to 2 or greater than 12.5.
 - ✓ Reactivity (D003) – The waste is unstable, may react with water or can generate toxic gases or vapors.
 - ✓ Toxicity (D004-D043) – The waste fails a laboratory procedure which predicts the ability of the waste to leach toxic constituents through soils and present toxic characteristics.

“Listed and Characteristic Wastes are sometimes referred to as “RCRA Hazardous Waste.” This is because Listed and Characteristic Wastes are regulated by the federal hazardous waste rules (RCRA) as well as the state dangerous waste regulations (WAC 173-303).

- **Washington State Criteria Waste** – The Washington State DW Regulations are more stringent than the federal HW rules (RCRA). Only in Washington State are the following types of waste considered dangerous (refer to WAC 173-303-100 for full descriptions):
 - ✓ Toxic Criteria Waste (WT01 or WT02) – Toxic Criteria Wastes are regulated in Washington State because testing shows they are lethal to fish or animals.
 - ✓ Persistent Criteria Wastes (WP01, WP02, or WP03) – Persistent Criteria Wastes are regulated in Washington State because the waste or components of the waste remain in the environment for a long time.

Washington State Criteria Waste are usually referred to as “State-Only Dangerous Waste.”

Universal Waste

“Universal waste” is DW for which less stringent regulatory standards have been applied. In Washington State, the following DWs are managed as universal waste IAW the requirements of WAC 173-303-573:

- Batteries (except lead acid batteries)
- Mercury containing devices such as thermostats, thermometers, and barometers

- Mercury vapor, high pressure sodium, neon, LED, or fluorescent light bulbs and lamps. *Incandescent and halogen lamps do not contain hazardous materials and may be disposed of as non-hazardous solid waste.*

Excluded Categories of Waste

The DW Regulations exclude certain types of wastes from the majority of the DW rules if certain conditions are met. The most common categories of excluded waste generated by WMD activities are:

- **Conditionally Excluded Wastes** are generally excluded because:
 - ✓ They are regulated under other state and federal programs (e.g., asbestos); or
 - ✓ They are recycled in ways that don't harm human health or the environment (e.g., spent antifreeze, used oil, lead-acid batteries)
- **Special Wastes** are state-only excluded wastes with their own set of management requirements (refer to WAC 173-303-073). These wastes are physically solid and pose a relatively low hazard to the environment. Subject to approval, they may be disposed in municipal landfills or recycled. Examples of special wastes generated WMD activities include contaminated shop rags or absorbents.

Radioactive and Medical Waste

Radioactive and medical wastes are also regulated but outside the scope of this document. The only medical-related waste addressed in this plan is pharmaceutical DW. For detailed guidance regarding pharmaceutical DW, refer to Appendix D of this plan.

WMD Operations That May Generate Dangerous Waste

Some WMD operations inherently generate DWs. Some of these operations are listed in Table 3-1.

Table 3-1. Process Operations That Typically Generate DW

Process Operation	Hazardous Products Used	Hazardous Ingredients Listed on Label	General DWs Generated
Engine parts and equipment cleaning	Degreasers (gunk), carburetor cleaners, engine cleaners, varsol, solvents, acids/alkalis, cleaning fluids	Petroleum distillates, aromatic hydrocarbons, mineral spirits, benzene, toluene, petroleum naphtha	Ignitable wastes, spent solvents, combustible solids, waste acid/alkaline solutions
Rust removal	Naval jelly, strong acids, strong alkalis	Phosphoric acid, hydrochloric acid, hydrofluoric acid, sodium hydroxide	Corrosive wastes, paint waste with heavy metals
Paint preparation	Paint thinners, enamel reducers	Alcohols, petroleum distillates, oxygenated solvents, mineral spirits, ketones	Spent solvents, ignitable wastes, paint wastes with heavy metals
Painting	Enamels, lacquers, epoxies, acrylics, primers	Acetone, toluene, petroleum distillates, epoxy ester resins, methylene chloride, xylene, aromatic hydrocarbons, methyl isobutyl ketone	Ignitable paint wastes, heavy metal paint wastes, spent solvents
Spray booth, spray guns and brush cleaning	Paint thinners, enamel reducers, solvents, white spirits	Ketones, alcohols, toluene, acetone, isopropyl alcohol, petroleum distillates, mineral spirits	Ignitable paint wastes, heavy metal paint wastes, spent solvents
HVAC, AC repair and service	Chlorofluorocarbons, Hydrochlorofluorocarbons (CFC, HCFC)	R-11,12,113,114,115, Carbon Tetrachloride, 1,1,1-trichloroethane, Hydrobromofluorocarbon (HBFC-22B1-1)	State only designated toxic waste
Interior and exterior light service	Bulbs, ballasts, switches	Mercury, Polychlorinated biphenyls (PCB), florescent, mercury vapor, metal halide, high-pressure sodium, neon	Bulbs, mercury switches and thermostats are toxic universal wastes, PCB containing light ballasts are state designated DWs

Generator and Handler Status

Generators of dangerous and universal waste are classified into five categories by the WDOE. The categories are small, medium and LQGs for DW generators, and small and large quantity handlers of universal waste for universal waste generators. Their requirements are summarized below and are in Table 3-2.

Small Quantity Generators (SQG)

SQGs must never generate more than 220 pounds of a DW or 2.2 pounds of acutely hazardous waste (AHW) or extremely hazardous waste (EHW) in any one month. SQGs do not have DW accumulation time limits and do not require an EPA Identification (ID) number. They may not accumulate more than 2,200 pounds of DW on-site at any one time. SQG status is the least regulated and offers the most flexibility in waste management and employee training. SQG status is the goal for all WMD generators.

Medium Quantity Generators (MQG)

MQG facilities generate between 220 and 2,200 pounds of DW and less than 2.2 pounds of AHW or EHW in any one month. Generators in this category are required to maintain formal documentation of waste activities and must have an employee training program. MQGs require an EPA ID number and must transfer DWs to a treatment, storage and disposal facility (TSDF) within 180 days of the accumulation start date (ASD).

Large Quantity Generators (LQG)

LQG facilities generate over 2,200 pounds of DW or 2.2 pounds of AHW or EHW in any one month. These facilities are required to develop and maintain formal written waste reduction plans, employee training plans, waste management documentation and spill/emergency procedures. LQGs require an EPA ID number and must transfer DWs to a TSDF within 90 days of the ASD. LQGs are the most regulated category of generator.

Small Quantity Handlers of Universal Waste (SQHUW)

Small Quantity Handlers of Universal Waste (SQHUW) generate less than 11,000 pounds of universal waste in a calendar year. They are not required to track their universal waste shipments. WMD policy, however, requires tracking of all universal waste shipments. SQHUWs do not require an EPA ID number and must transfer universal waste to a recycling facility or TSDF within 365 days of the ASD.

Large Quantity Handlers of Universal Waste (LQHUU)

Large Quantity Handlers of Universal Waste (LQHUU) generate more than 11,000 pounds of universal waste in a calendar year. They are required to track their universal waste shipments and provide formal training regarding the proper handling of each universal waste generated. LQHUU are required to obtain an EPA ID number and transfer wastes to a recycling facility or TSD within 365 days of the ASD.

Table 3-2. WDOE DW Generator Status Classifications

Generator Status	DW Generation per Calendar Month/Year
SQG	No more than 220 lbs. of DW (about ½ drum) or 2.2 lbs. of acutely hazardous waste (AHW) or extremely hazardous waste (EHW) per month
MQG	More than 220 lbs., but less than 2,200 lbs. of DW (approximately between ½ drum and 5 drums), or less than 2.2 lbs. of AHW or EHW per month
LQG	More than 2,200 lbs. of DW (approximately 5 drums), or 2.2 lbs. of AHW or EHW per month
LQHUU	More than 11,000 pounds of universal waste per calendar year
SQHUU	Less than 11,000 pounds of universal waste per calendar year

EPA Identification Numbers

The EPA ID number is EPA and WDOE’s tool for identifying and monitoring DW generators and their waste. Identification numbers are required for medium and LQGs. However, some small quantity generators may have ID numbers as well, usually because they have had medium or large quantity status in the past. **Table G-1 in Appendix G shows the generator status of each WMD facility and respective EPA ID number.**

Chapter 4 - Accumulating Dangerous Waste

There are two types of DW accumulation areas: satellite accumulation points (SAPs) and general DW accumulation areas (DWAAs). Each accumulation area has specific uses and standards that apply. This chapter discusses general requirements for container management and some specific details regarding SAPs and DWAAs.

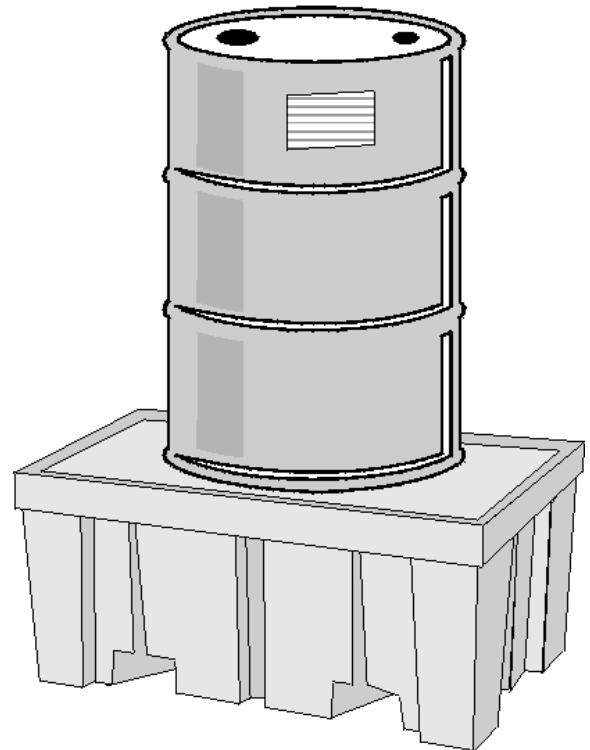
Satellite Accumulation Point (SAP)

A generator may accumulate as many as 55 gallons of DW (or 2.2 lbs. of acutely or extremely hazardous waste) per waste stream in containers at or near any point of generation where waste initially accumulates. The SAP must be under the control of the operator of the process generating the waste or secured at all times to prevent improper additions of wastes to a satellite container.

When 55 gallons of DW (or 2.2 lbs. of acutely or extremely hazardous waste) is accumulated per waste stream, the container(s) must be marked immediately with the ASD and moved within three days to the designated DWAA.

SAPs are the only accumulation areas where waste containers do not require an ASD until waste thresholds are met (55 gallons or 2.2 lbs. of acutely or extremely hazardous waste).

Supervisors of shops generating DW will designate a primary and alternate SAP Manager to ensure SAP containers are managed IAW the DW Regulations as outlined in this plan.



Dangerous Waste Accumulation Area (DWAA)

DWAAs are designed to accumulate larger quantities of DW before it is shipped off site by DLA DS for proper disposal. Whereas SAPs are found nearby the waste generating process, DWAAs are typically found in a separate distinct location such as outside the main building. There is usually one DWAA per site. Reproducible signs, such as the one shown below, are provided at the end of this chapter for both DWAAs and SAPs.

The amount of time you are allowed to store wastes in the DWAA usually depends on your generator status. However, unless authorized by the WMD EPO, it is WMD policy to transfer all DWs (except universal wastes) to DLA DS within 90 days of the ASD. This ensures that accumulation limits are not exceeded.

Supervisors will designate a primary and alternate DWAA Manager to ensure DWAAs are managed IAW the requirements of the DW Regulations as outlined in this plan.



General Requirements for Waste Accumulation

The requirements described in this section are applicable to both SAPs and DWAAs unless otherwise specified. See Figure 4-1 for a visual “checklist” of the container management requirements discussed below.

Weekly Inspection

Every WMD facility that generates DW must conduct a weekly inspection of its DWAA. This is a federal and state regulatory requirement for medium or LQGs and a best management practice for small quantity generators. The WMD uses the Weekly Inspection Checklist (Ecology Publication Number 12-04-019) to perform and document this inspection. A copy of this checklist is provided in Chapter 6.

Container Condition

DW containers must be in good condition (i.e., not rusted or defective) and compatible with the waste in the container. For solvents, use metal drums; for acids or caustics, use polyethylene.

Containers used to accumulate waste must meet DOT requirements, unless the drum remains on site. The size of the container also needs to be considered based on the annual generation of the waste stream. Containers are available in all sizes, including 1-, 3-, and 5-gallon pails and 15-, 20-, 30- and 55-gallon drums.

Containers being reused must be clean and in good condition with all previous markings and labels painted over or removed.

Secondary Containment

Containers of liquid waste must have adequate secondary containment. The containment system should have sufficient capacity to either contain the volume of the largest container or 10% of the volume of all containers, whichever is greater.

Floor drains must be plugged in waste accumulation areas.

For incompatible wastes, segregated containment must be provided by using either separate containment areas or by means of dikes or sloped containment to separate sumps.

Storage and Compatibility

Ensure at least 30 inches of space between rows of waste containers.

Do not stack more than two waste containers on top of each other.

Containers must be arranged so that chemically incompatible wastes cannot come in contact with each other.

Only one waste stream will be added to each DW container.

Nonhazardous waste must not be mixed with DW.

Do not store containers near heat sources, open flames, or any other ignition source.

Adding or Removing Waste

DW containers must be kept closed except to add or remove waste.

All containers of DW must be stored so that, if the container were to tip over, no DW would spill out. If using a funnel without a locking top, the funnel should be removed, and the container closed after filling.

Containers holding liquid waste should only be filled to 90% capacity to allow head space for expansion of liquids (e.g., a 55-gallon drum should have a minimum of 4 to 6 inches head space).

Containers bearing ignitable DW must be grounded when adding or removing waste. Contact the installation/activity safety officer for grounding and bonding instructions. No Smoking signs must be placed conspicuously when there is a hazard from ignitable or reactive waste.

Site Considerations

Containers must be stored away from heat sources, open flames, or any other ignition source. Containers must be protected from freezing during cold weather. Containers stored outside should be protected from direct sunlight and precipitation by means of a roof, tarpaulin or similar device. Containers stored indoors should be kept in well ventilated :

Marking and Labeling

Each container of DW in a DWAA must be labeled properly. An example of a properly labeled DW container is shown at the right. The label or marking must be easy to read and include:

- “Dangerous waste” or “hazardous waste”
- Major risk(s) associated with the waste (i.e., flammable, toxic)
- The ASD



Unlike in a DWAA, do not mark the ASD on a container in the SAP until it becomes full.

For labeling requirements of commonly generated waste streams, refer to the Waste Profile Sheets in Appendix A.

Emergency Response Equipment

The following will be available at or nearby DWAAAs:

- A posted contingency plan or site map for responding to DW emergencies (i.e., ICP-SPCC Plan).
- Internal communication system (voice or signal) to provide immediate emergency instruction to activity personnel.
- Access to emergency assistance for police and fire departments.
- Portable fire extinguishers.
- Spill control equipment types of spills most likely to occur.

All equipment must be tested or inspected monthly and maintained as necessary to assure its proper operation in time of emergency.

Inspect Your Dangerous Waste Drums

TIGHTEN BUNGS

Keep bungs tight except when adding waste to the container.

GROUND DRUMS

Prevent igniting flammable waste by grounding drums.

AISLE SPACE

Leave at least 30" of aisle space between rows of drums. Rows must be no more than two drums wide.

SECONDARY CONTAINMENT

Secondary containment must be large enough to contain 10% of the free liquid in all containers or 100% of the free liquid in the largest container, whichever is larger.

LATCH FUNNELS

Keep funnels closed and latched when not in use. Funnels must be screwed in with gaskets.

TIGHTEN LIDS

Make sure contents cannot spill if tipped over.

LABEL IT

Labels must be visible.

NO LEAKS

Keep drums free of corrosion, bulges, and other damage.

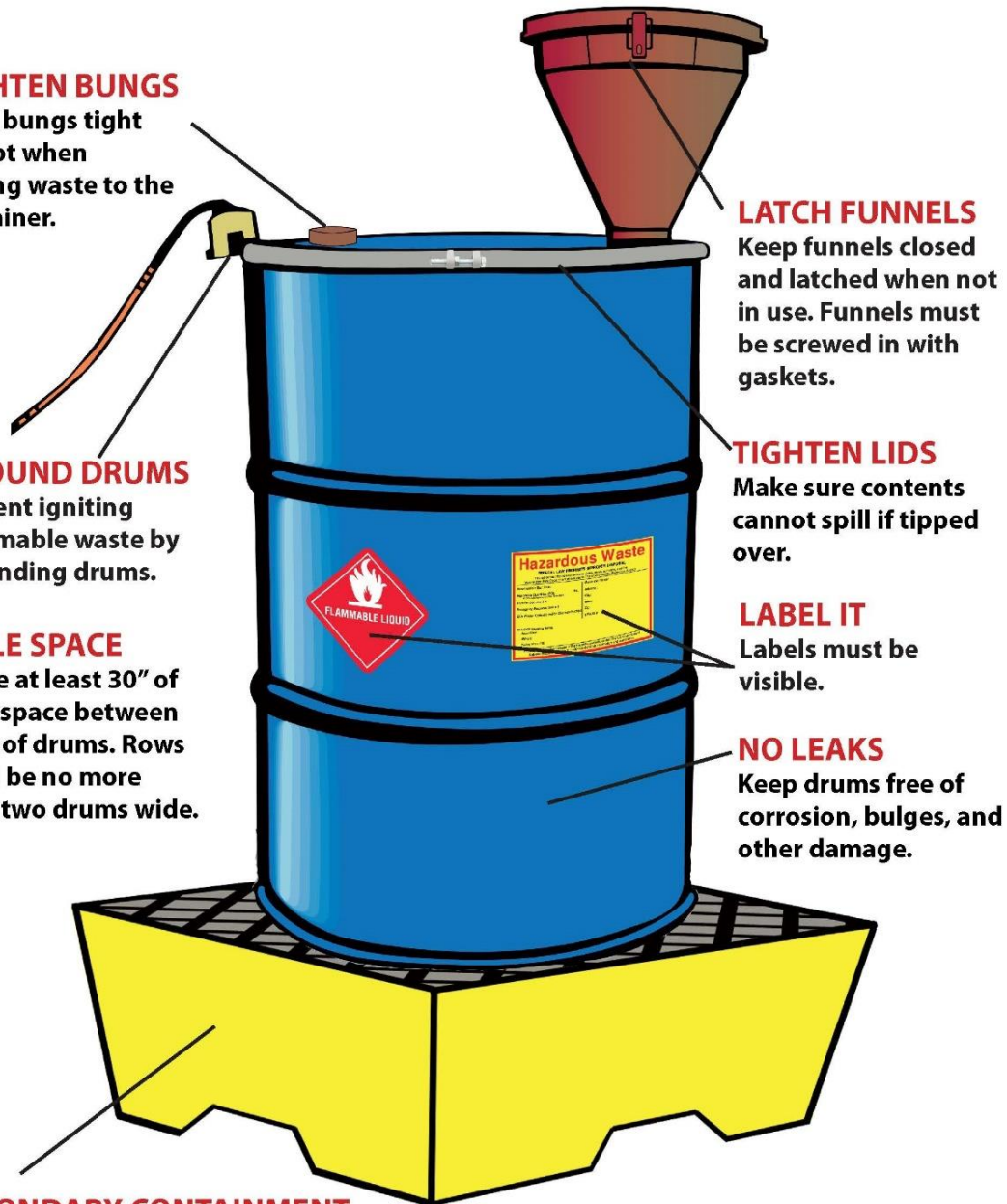


Figure 4-1. "Do Your Drums Pass the Test?" (source: WDOE Publication #08-04-015)

Templates for Waste Accumulation Areas

This section includes the following signage and forms:

- Satellite Accumulation Point Sign
- DW Accumulation Area Sign
- DW Accumulation Log

THIS
SATELLITE ACCUMULATION POINT
ACCEPTS DANGEROUS WASTE
ONLY
IF GENERATED BY:

SAP MANAGER

Primary: _____ Tel: _____
Alternate: _____ Tel: _____
Emergency (Fire Department) Telephone Number: "911"

RISK HAZARDS:

NO SMOKING OR OPEN FLAME
WITHIN 50 FEET



Dangerous Waste Accumulation Log

Waste Type	Quantity/Volume	Reason for Disposal	Disposal Date	Initial
Ex. Aerosol cans	2 (16 oz) cans	spent	1/21/2010	

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Chapter 5 - Turning in Dangerous Waste

The final step in “cradle to grave” management of DWs is the transfer of the waste to a RCRA permitted TSDF. The WDOE DW Regulations place great emphasis on the procedures involved in moving the waste from the generator to the TSDF. The generator must be able to track the waste through every part involved in the disposal process. This chapter describes the procedures for turning in DW in the WMD.

Turning in Dangerous Waste

A contracted service vendor (DLA DS) picks up and transports DW from all WMD facilities. DLA DS provides the necessary paperwork and is responsible for meeting all DOT transportation requirements including:

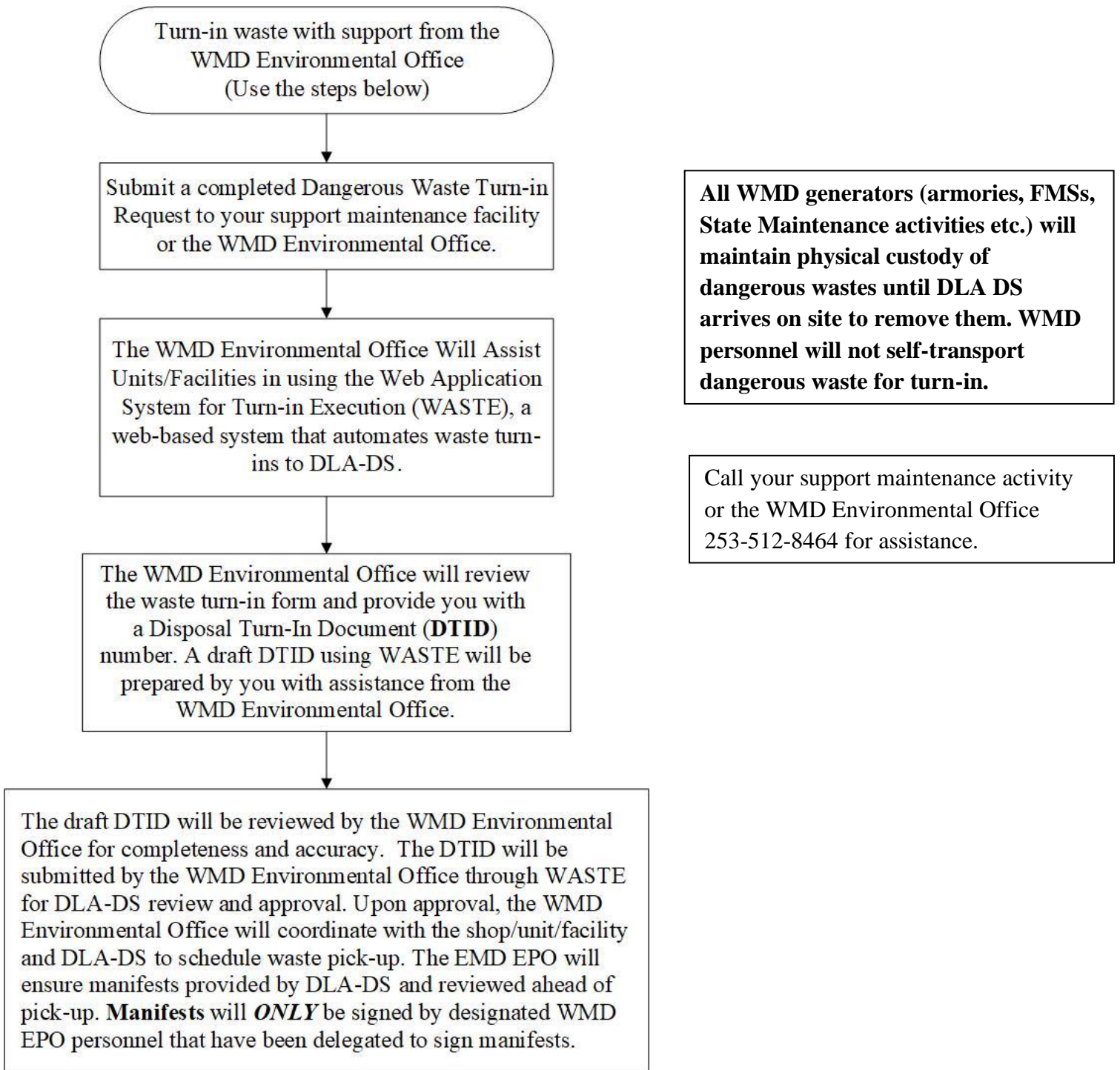
- Inspecting shipments prior to leaving the site to authorized/approved containers, labels and manifests that are used
- Placing proper DOT shipping labels on the containers
- Segregating incompatible waste within the transporting vehicle
- Securing wastes in the vehicle
- Placarding the vehicle

ATTENTION!

*All WMD generators (armories, FMSs, State Maintenance activities etc.) will maintain physical custody of all DWs until DLA DS arrives on site to remove them. **WMD personnel will not self-transport DW to their support maintenance facility for subsequent turn-in to DLA DS.***

See Figure 5-1 for a flowchart of the DW turn-in process. Step-by-step instructions for turning in DW are also provided on the pages that follow.

Figure 5-1. DW Turn-in Process



Arranging a DLA DS Pick-up

- STEP 1. Submit a completed DW Turn-in Request to either the WMD EPO or your support maintenance facility. (Details of the process for waste turn-in, along with a copy of the waste turn-in form are included at the end of this section). The WMD EPO will review the waste turn-in form and communicate with the maintenance shop or the POC listed on the waste turn-in form if clarifications or additional info are needed.
- STEP 2. The WMD EPO will verify Waste Profiles. No DW pickup will be scheduled by DLA DS without a current and accurate hazardous waste profile sheet.

It is recommended to maintain waste profiles for all waste streams at your site in a binder. Waste profile information is located in Appendix A. If you don't have a profile for a particular waste stream, contact your support maintenance activity or the WMD EPO.

If there is reason to believe the waste stream has changed or deviated from the standard profile, it should be sampled and tested. The WMD EPO has a budget to support sampling and analytical testing. To utilize this service please contact your support maintenance activity or the WMD EPO at 253-512-8464.

- STEP 3. The WMD EPO will communicate with DLA DS for verification of each waste profile. Following verification, The WMD EPO will then contact the requesting unit/activity to prepare the draft Disposal Turn-in Document (DTID) using WASTE. The WMD EPO will review and submit the DTID to DLA for processing and scheduling pick-up of waste.
- STEP 4. At the time of pick-up, the WMD EPO will review disposal paperwork for accuracy. The manifest will only be signed by WMD EPO personnel designated to sign manifests.

The WAARNG has delegated WMD EPO personnel to sign disposal manifests IAW Agency Memorandum dated 31 January 2020.

- STEP 5. Keep the generator copy of the manifest (the WMD EPO will provide a copy following completion of pick-up) and file it IAW Chapter 6 of this plan.
- STEP 6. Annotate the transfer of DW on a copy of the DW Manifest Log, MIL FORM 519. A copy of this form is provided at the end of this section.
- STEP 7. All generator manifests are being mailed to the WMD EPO office. Within 30 days you should receive a copy of the signed original manifest from the WMD EPO. If the TSDF mails you a copy of the original manifest, please notify the WMD EPO (DW Program Manager).
- STEP 8. If a copy of the original signed manifest is not received from the WMD EPO within 30 days, contact the DW Program Manager immediately: 253-512-8464.

Turning in Dangerous Waste on Federal Installations

As a general rule, waste generated on a Federal Installation (JBLM, YTC, and FAFB) must stay on the Federal Installation and be disposed of per the Federal Installation's guidelines.

WAARNG personnel will not transport DW generated on a Federal Installation (i.e., during drill weekend) for turn-in through WAARNG channels.

WAARNG units and maintenance activities must coordinate all waste-generating activities with the Federal Installation's Environmental Department:

- On JBLM, units must coordinate all waste-generating activities with Hazardous Waste Operations at Building 9678 (253-967-4786).
- At the YTC, units must coordinate all waste-generating activities with the One Stop Shop at Building 450 (509-577- 3830). This includes DW generated during drill weekends or other training events.
- At FAFB, units must coordinate all waste-generating activities with the Environmental Department (509-247-8133).

Self-Transporting Dangerous Waste

Although exceptions are noted for Small Quantity Generators in WAC 173-303-070(b), it is WMD policy that WMD generators (armories, FMSs, State Maintenance activities etc.) will not self-transport DW (i.e., to their supporting maintenance facility for subsequent turn-in to DLA DS). WMD generators will maintain physical custody of all DW until DLA DS arrives to remove them.

WMD personnel will comply with this policy unless otherwise authorized by the WMD EPO or due to mission requirements, self-transporting DW becomes necessary.

Forms for Turning in Dangerous Waste

The section includes the following forms:

- DW Turn-in Form
- MIL FORM 519 – DW Manifest Log

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Enclosure 2 - Waste Turn in request Form

Hazardous Waste POC (Hazardous Waste Program Manager 253-512-7948 env@mil.wa.gov)						
Unit/Facility/Building:		Date:	Name, Title:		Phone#:	
Item #	Nomenclature	Type of Waste (see legend below)	Container Type	Container Size	# of Containers	Approximate Volume/Weight

*Legend: HW - Hazardous Waste; UW - Universal Waste;
 NH - Non-Hazardous Waste; O - Other/Unknown*

*Rev1, 07/21/2020
 CFMO, Environmental Programs Office*

EPO Signature

Unit/Facility Signature

DANGEROUS WASTE MANIFEST LOG

UNIT/ACTIVITY _____

YEAR _____

EPA ID# _____

DATE SHIPPED	MANIFEST NUMBER	DESCRIPTION OF WASTE	QUANTITY P or G	DESIGNATED FACILITY NAME	DATE ORIGINAL GENERATOR COPY RECEIVED	COMMENTS

Chapter 6 - Inspections and Recordkeeping

Weekly Inspections

Every WMD facility that generates DW must conduct a weekly inspection of its DW Accumulation Area (DWAA). This is a federal and state regulatory requirement for medium or LQGs and a best management practice for small quantity generators.

The WMD uses the Weekly Inspection Checklist (Ecology Publication Number 12-04-019) to document this inspection. A reproducible copy of this form is provided at the end of this chapter and can also be found on the WDOE website:

<https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070384.html>

Facility supervisors are responsible for ensuring these inspections are performed and documented. Facility supervisors are also charged with requesting, in writing, any corrective actions required for deficiencies noted during an inspection.

Recordkeeping Requirements

Proper records management is crucial to the success of the WMD's DW program. All employees must know the location of pertinent records in the event of a regulatory compliance inspection. Therefore, WMD policy is to create an Environmental Recordkeeping Binder to ensure records are kept in one area and easily accessible.

All records will be kept for a minimum of five years, with the exception of training records. Training records must be kept for the duration of an individual's employment plus thirty years.

The DW Regulations ([WAC-173-303](#)) and [AR 200-1](#) require all users of HM and generators of DW to maintain the following records, which are summarized below.

- HW manifests
- Non-hazardous waste manifests
- Annual DW Reports
- Waste designation records
- DWAA Weekly Inspection Checklists
- Safety Data Sheets (SDSs)
- Installation Contingency Plan/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plans
- Training record

Hazardous Waste Manifests

HW manifests must be retained for a period of five years from the date the waste was accepted by the initial transporter (DLA DS). A complete manifest includes the generator's copy and the original copy on file. Copies of the Land Disposal Restriction (LDR) forms must be kept with each applicable manifest. Facilities must use the DW Manifest Log (Chapter 5) to effectively track all documentation. A separate log must be kept for each calendar year, and each log must be retained for 5 years.

Non-Hazardous Waste Manifests

Non-hazardous waste manifests or Bills of Lading will be on file for five years. Facilities will document and track the shipment of these wastes (i.e., used oil, antifreeze, contaminated soils, floor sweep, rags) using the DW Manifest Log at the end of Chapter 5. There is no requirement to maintain a separate log for non-hazardous wastes. A single consolidated manifest log showing all waste shipments will be produced for each calendar year.

Annual Dangerous Waste Report

Every year the WMD EPO prepares and submits an Annual DW Report to the WDOE. The WMD EPO is responsible for maintaining Annual DW Reports which are submitted and filed electronically with the WDOE.

Waste Designation Records

The WMD EPO maintains waste designation records (current waste profiles and results of analytical testing). A copy of the records pertinent to your site can be obtained by contacting the WMD EPO at (253) 512-8464.

Dangerous Waste Accumulation Area (DWAA) Weekly Inspection Checklists

DWAAs must be inspected weekly using the Weekly Inspection Checklist at the end this chapter. The Weekly Inspection Checklist must be maintained for a period of five years, preferably in the DWAA itself. Corrective action requests should be kept along with the applicable Weekly Inspection Checklist(s).

Safety Data Sheets

Copies of all Safety Data Sheets (SDSs) must be kept in a visible location IAW the agency's Hazard Communication Program.

Each SDS must be current for all chemicals in use at the facility and kept for 30 years.

Installation Contingency Plan (ICP)/Spill Prevention, Control and Countermeasure (SPCC) Plan

Each facility that stores HM is required to prepare a spill prevention and response plan. At WMD facilities, this plan is referred to as the ICP/Spill Prevention, Control and Countermeasure (ICP- SPCC) Plan. This plan must be kept on file, along with records of the AT exercise of the plan's provisions. The ICP-SPCC Plan must be reviewed annually and updated appropriately.

Spill Log

Facilities must keep records of all spills. At a minimum, the log should include the date and location of the spill event, the volume and substance spilled, cleanup and corrective actions taken, and the time the Environmental Program Office Spill Coordinator at (253) 355-4364, or the JOC on Camp Murray (253) 512-8773 or (888) 276-4362 was called.

Training Records

Generators must keep copies of all DW, OSHA, and DOT hazardous material training received by facility personnel. Records must include name of employee, job title, dates of training, type of training, and person/agency that provided training. Records must be retained in the workplace for the duration of employment plus thirty years.

Forms for Inspections and Recordkeeping

Weekly Inspection Checklist (Ecology Publication Number 12-04-019)



Weekly Inspection Checklist for Central Accumulation Areas

If you generate dangerous waste and use a central accumulation area (CAA), you must self-inspect your CAA once a week (from Sunday to the following Saturday). Use this checklist to help you stay in compliance and identify problem areas that need to be addressed.

- Answer “yes” or “no” for each question, every week.
- If you need help, contact your [regional office](#).¹

	Date	Time	Inspector’s printed name	Signature
Week 1:				
Week 2:				
Week 3:				
Week 4:				
Week 5:				

Required weekly

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is the accumulation area free of leaks and spills?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are all containers in good condition (no severe corroding, rusting, flaking, scaling, or structural defects)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Is the secondary containment system free from deterioration (such as cracks, gaps, or corrosion)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Container management and operation

We recommend you inspect these items weekly to remain in compliance.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are all containers marked or labeled as “hazardous waste,” “dangerous waste,” or “waste pending analysis?”	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are all containers marked with the hazards associated with the waste (ignitable, reactive, corrosive, and toxic)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Are all containers (excluding satellite accumulation containers) marked with the accumulation start date?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Are all containers within the large quantity generator 90-day or medium quantity generator 180-day timeframe?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

¹ <https://ecology.wa.gov/contact.html>

Accommodation Requests | To request materials in a format for the visually impaired, visit ecology.wa.gov/accessibility, call Ecology at 360-407-6700, Relay Service 711, or TTY 877-833-6341.

Weekly inspection checklist for central accumulation areas

Hazardous Waste and Toxics Reduction Program



Questions	Week 1	Week 2	Week 3	Week 4	Week 5
5. Are all container labels visible and readable?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Are all containers closed?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
7. Are there 30 inches of aisle space between rows of containers?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
8. Are rows of containers at most two containers wide and allow for unobstructed inspection of each container?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Secondary containment

Question	Week 1	Week 2	Week 3	Week 4	Week 5
1. Is secondary containment clean and free of debris, contamination, spills, leaks, and standing water?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Preparedness and prevention

You must have additional equipment to detect and prevent hazards and perform general inspections of that equipment. See [General Facility Inspection Log²](#) for comprehensive general facility inspection requirements.

Questions	Week 1	Week 2	Week 3	Week 4	Week 5
1. Are fire extinguishers charged?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Are spill kits stocked?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
3. Is the emergency shower and eye wash station functioning properly?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
4. Are the emergency communication devices operating properly?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
5. Is emergency response information posted near all communication devices (MQG only)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

Actions taken

If you responded “no,” to any of the questions, describe how you fixed the problem and include the date you took action to solve it.

² <https://fortress.wa.gov/ecy/publications/SummaryPages/1304012.html>

Chapter 7 - Training

Required Training

The following WDOE, DOT, OSHA, and ARNG regulations require that all persons working with HM and/or DW must be properly trained:

- WDOE - Dangerous and Universal Waste Management: WAC 173-303 requires that facility personnel successfully complete classroom or on-the-job training that teaches them to perform their duties to ensure that the facility is compliant with the DW Regulations.
- OSHA - Hazardous Waste Operations and Emergency Response (HAZWOPER): 29 CFR 1910.120 (q)(6) requires the appropriate level of training for employees who are expected to participate in responding to HAZMAT incidents.
- OSHA - Hazard Communication (HAZCOM): requires facilities to train their employees about the hazardous chemicals to which they are exposed.
- DOT - Hazardous Material (HAZMAT) Management: 49 CFR 172.704 requires that employees handling HAZMAT undergo general awareness/ familiarization training, function-specific training and safety training.
- DOT - HAZMAT Transportation: 49 CFR 177.800 and .816 require that drivers of HAZMAT be properly trained in safety and vehicle operation.

DA Pamphlet 200-1 requires this plan to include DW, OSHA, and spill response training. This plan also outlines DOT HAZMAT management and transportation requirements.

Dangerous & Universal Waste Management Training

- Large Quantity Generators (LQG)

A facility with an LQG status requires a written employee training plan. The training plan must ensure personnel who handle DW are thoroughly familiar with proper waste handling, emergency equipment and systems, and emergency procedures.

Training for LQGs must be provided by a person knowledgeable in DW management procedures and address topics relevant to the positions in which the facility personnel are employed.

The ECO course is designed to meet LQG training requirements. The ECO course also meets the training requirements for Small and Large Quantity Handlers of Universal Waste.

Training for LQGs must be provided within six months of employment or assignment. Employees must be supervised until training is complete. Training must be reviewed annually and documented IAW Chapter 6.

- Medium Quantity Generators (MQG)

MQG facilities must provide adequate training to ensure personnel who handle DW are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities.

Initial training shall be provided within six months of employment or assignment. As a best management practice, training should be reviewed annually and documented IAW Chapter 6.

- Small Quantity Generators (SQG)

SQG facilities do not require a written training plan but must ensure HAZCOM training is provided and that DW is managed in a way that does not pose a potential threat to human health or the environment.

Emergency Response

Personnel at facilities with an Installation Contingency Plan /Spill Prevention, Control and Countermeasure (ICP-SPCC) Plan are required to conduct an AT drill or exercise to ensure adequate understanding of the facility's spill response procedures.

Training requirements vary depending on assigned duties or levels of response and are detailed in each site-specific Installation Contingency Plan/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plan.

The designated Facility Emergency Coordinator is responsible for providing the annual ICP-SPCC training. If you have questions or require assistance, contact the WMD EPO at 253-512-8464.

Hazard Communication (HAZCOM)

Persons who work with chemicals on the job are required by OSHA to have HAZCOM or "Worker-Right-to-Know" training. HAZCOM training is required upon initial job assignment and biennially thereafter. Training is also required when hazards change (e.g., if a significant change in mission affects the types and quantity of HAZMAT used and stored). The Safety Office is the proponent of the HAZCOM program.

Hazardous Materials (HAZMAT) Management

Persons who prepare HAZMAT for transportation and/or operate vehicles used to transport HAZMAT require familiarization and safety training as described in 49 CFR 172.704.

In the WAARNG, the Ammo 67 online course (“HAZMAT Familiarization and Safety in Transportation”) meets this requirement. The proponent for DOT training is G4 Logistics.

HAZMAT Transportation

Persons who transport HAZMAT must have training on the preparation of shipping papers, marking, labeling, placarding, packaging, compatibility, and emergency response. Refresher training is required biennially.

In the WAARNG, the 80-hr Ammo 62 course (“Technical Transportation of Hazardous Materials”) satisfies this requirement. The proponent for DOT training is G4 Logistics. In the WAARNG, the Ammo 62 course qualifies an individual to sign disposal manifests.

Environmental Compliance Officer (ECO) Training

Major Subordinate Commands (MSCs), Battalions, Companies, and activities (i.e., a non-unit structure such as a Facility Maintenance Shop (FMS)) will appoint one Primary ECO and one Alternate ECO. The Alternate ECO will assist the Primary ECO, and when the Primary ECO is absent, act on their behalf. ECOs must be trained within 6 months after appointment.

ECO training consists of an instructor-led, three-day, hands-on course. Certification is valid for two years. Federal and state regulations covered in the ECO course include:

- Employer - Chemical Hazard Communication: WAC 296-901
- LQG Training: WAC 173-303-330
- Small and Large Quantity Handlers of Universal Waste: WAC 173-303-573 (12) and (23), respectively
- Spills and Discharges to the Environment: WAC 173-303-145
- SPCC Training: 40 CFR 112.7(f)

Topics included in the ECO training include but are not limited to those listed in Table 7-1.

Table 7-1. ECO Training Needs (source: ARNG Environmental Training Strategy, 2006)

Training Need	Learning Objectives (skills, knowledge, ability)
Overview of environmental regulations as related to the organization	<ul style="list-style-type: none"> • Knowledge of major environmental laws and regulations related to organization’s training, operations and logistics functions
Conduct Inspection	<ul style="list-style-type: none"> • Ability to perform a unit environmental self-assessment inspection
Documentation Management	<ul style="list-style-type: none"> • Ability to manage information concerning the unit’s environmental training and certification requirements
Environmental Risk Assessment	<ul style="list-style-type: none"> • Ability to perform an environmental risk assessment
DW Management and Disposal	<ul style="list-style-type: none"> • Knowledge of waste management procedures relevant to the positions in which they are employed • Ability to identify waste and waste streams, proper handling and disposing of waste, setting up and maintaining waste accumulations sites, labeling, inspecting waste sites, and responding to waste emergencies
Spill Prevention	<ul style="list-style-type: none"> • Knowledge of preventative steps to minimize spills
Spill Response	<ul style="list-style-type: none"> • Knowledge of the actions during a spill response

Environmental Responsibilities

Jobs within the WMD can be grouped together based on similar job functions as they relate to environmental training. The following table represents the different job functions and summarizes their environmental responsibilities, which define the training requirements for these job functions.

Job Function	Environmental Responsibility
Commander	Responsible for all environmental actions under his/her command. This position does not require the commander to be a technical expert. However, a general orientation to environmental requirements is required.
Executive Officer Administrative Officer Platoon Leaders	These positions require the same training as the commander because they have the same responsibilities as the commander in his/her absence.
S-4 Officer/NCO Signal Officer/NCO Support PSG	The S-4/Signal Officer/NCOs are not physically involved with HM but are responsible for determining and/or implementing policy and/or providing technical guidance.
Chemical Officer/NCO	The Chemical Officer/NCO manages chemical detection and deployment for the command and may have chemical wastes generated from their activities. A general understanding of HM and DW management is required, as well as a broad understanding of their potential impacts on the environment.
Shop Chief	Shop Chiefs are responsible for ensuring maintenance activities and personnel comply with regulations. They must have an in-depth knowledge of their environmental responsibilities and procedures.
Motor Sergeant	Motor Sergeants are required to have an in-depth knowledge of HM and DW management due to their operational activities in the field.
Mechanic	Mechanics require an in-depth knowledge of HM and DW management. Mechanics routinely use HM and generate their associated wastes.
Tool/Parts Attendant	A Tool/Parts Attendant's environmental responsibilities mainly deal with HM purchases. They should understand hazardous chemicals, shelf life, chemical substitution, and pollution prevention.
Supply Sergeant Support PSG	Supply Sergeants manage each unit's supply purchases and turn-ins. They should understand hazardous chemical compatibility and storage, shelf life management, and HM and DW management.

Job Function	Environmental Responsibility
Hazardous Materials Technician	HM Technicians process, transport, turn-in, and respond to spills of HM and DW. They must have the most broad and in-depth knowledge of all jobs within the WMD as they relate to managing HM and DW. They must have knowledge regarding hazardous chemical compatibility and storage, HM/DW transportation, and emergency response procedures.
Shipping and Receiving Personnel	Shipping and Receiving Personnel stock and handle hazardous chemicals as well as prepare manifests for shipping HM. They must understand SDSs, and hazardous chemical compatibility, storage, shelf-life, and small spill management. They must also be proficient in packaging HM for shipment.
Warehouse Personnel	Warehouse Personnel stock, manage, and distribute hazardous chemicals. They must understand SDSs, as well as chemical compatibility, storage, shelf-life and spill management.
Field Sanitation Teams	Field Sanitation Teams store, handle and transport HM, such as pesticide. They need to understand SDSs, as well as chemical compatibility, storage, shelf-life, and spill management. In addition, they need to understand the transporting requirements for HM/DW.
Medical Teams	Medical Teams handle and transport biohazards such as medical waste. They need to understand the hazard of contamination and spill management, as well as the transporting requirements for HM/DW.
Laborer	Laborers may handle hazardous chemicals within the course of their duties. They must understand SDSs and have general environmental awareness training to ensure they manage, use, and dispose of these chemicals properly.
HAZMAT Carrier	HAZMAT Carriers transport HM via public highways and must be trained and understand SDSs as well as hazardous chemical compatibility. In addition, they must understand how to properly load, placard, transport and respond to HM spills.
Fuelers	Fuelers transport and dispense fuels such as diesel and JP-8. They must understand SDSs and how to properly transport fuel, transfer fuel, and respond to spills.
Ammo Handler/ Transporters	Ammo-handling within the WMD generally involves picking up and transporting ammunition from Ammunition Supply Points to firing ranges. Handlers and transporters of ammunition must have the same skills as hazardous material transporters.

Job Function	Environmental Responsibility
Soldier	Traditional Soldiers generally manage small amounts of hazardous chemicals. These chemicals are used to clean and maintain operational and tactical equipment such as weapons and vehicles. To ensure soldiers manage these chemicals responsibly, they must understand SDSs, and have general environmental awareness training.
ECO	ECOs are the Unit Commander's and Activity Supervisor's technical representative with regard to environmental matters. ECOs must have extensive knowledge regarding environmental management, as well as a general understanding of all Army environmental programs and their relationship to each unit or activity's operation.

Appendix A - Waste Profile Sheets

In order to simplify the waste management process, specific handling procedures for common wastes have been developed in the form of Waste Profile Sheets (WPS). For assistance or to request additional Waste Profile Sheets, contact the DW Program Manager in the Environmental Programs Office at 253-512-8464.

- Absorbents – Contaminated with Antifreeze
- Absorbents – Contaminated with POL
- Aerosol Cans – Full or Partially Used
- Antifreeze, Spent, (For Recycle)
- Aqueous Parts Washer Sludge
- Asbestos
- Batteries – Alkaline
- Batteries – Non-Alkaline
- Calcium Hypochlorite, Dry
- Soil/Gravel, Contaminated with POL (Spill Debris)
- Fuel Filters – Mogas
- Fuel Filters – Metal Encased – Diesel/JP8/Oil (For Recycle)
- Fuel Filters – Open Element – Diesel/JP8/Oil
- Fuel – Off-Spec – Diesel/JP8
- Fuel – Off-Spec – Mogas
- Grease – Off-Spec
- Light Bulbs
- M-256 Detector Kits
- M-258A1/M-58A1 Decontamination Kits
- M-272 Chemical Agent Water Test Kits
- Monitoring Well Purge Water
- MRE Flameless Ration Heaters – Bulk Quantities
- NBC Protective Mask Filters
- Night Vision Image Intensifier Tubes
- Oil Cans, Crushed, (For Recycle)
- Paint Booth Filters
- Paint Related Material – Liquids – Non-Latex
- Paint Related Material – Solids – Non-Latex

- Paint – Latex
- Solvent Filters (PD-680 Type II or III)
- Solvent – Used (PD-680 Type II or III)
- Unknown Wastes
- Used Oil (For Recycle)
- Pharmaceutical Waste
- Pharmaceutical Waste – Albuterol Inhalers
- Pharmaceutical Waste – Silver Nitrate Swabs
- Weapons Cleaning Debris
- PCB containing ballasts

ABSORBENTS - CONTAMINATED WITH ANTIFREEZE

Absorbent pads, rags, pigs, and floor sweep etc. contaminated with antifreeze

ATTENTION!	
<p>Absorbents include pads, rags, pigs, berms, floor sweep etc. This WPS applies ONLY to absorbents contaminated with antifreeze. Absorbent materials used to clean up other products must be characterized separately. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>	
REGULATORY STATUS	
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NON-HAZARDOUS WASTE • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT 	
Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum 	
Step 2	Prepare, Mark and Label the Container
<p>Labels or markings should clearly show:</p> <ul style="list-style-type: none"> • The words “NON-HAZARDOUS WASTE” • An example of a properly labeled container is provided at the right. 	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the absorbed product’s SDS. • Add used absorbents to container, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to containers of non-hazardous waste.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



ABSORBENTS - CONTAMINATED WITH POL

Absorbent pads, rags, pigs, and floor sweep contaminated with POL

ATTENTION!	
<p><u>Absorbents include pads, rags, pigs, berms, floor sweep etc. This WPS applies ONLY to absorbents contaminated with grease, oil and other POL and where the entire free product was absorbed (i.e., no free liquids).</u> Absorbent materials used to clean up other products must be characterized separately. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>	
REGULATORY STATUS	
<ul style="list-style-type: none"> Environmental – WA Dept. of Ecology – NON-HAZARDOUS WASTE Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT 	
Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> Approved Container: Removable head drum 	
Step 2	Prepare, Mark and Label the Container
<p>Labels or markings should clearly show:</p> <ul style="list-style-type: none"> The words “NON-HAZARDOUS WASTE” <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> Wear the proper PPE listed on the absorbed product’s SDS. Add used absorbents to container, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to containers of non-hazardous waste.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



AEROSOL CANS – FULL OR PARTIALLY USED

All aerosol cans, except Insecticides, Herbicides, Fungicides and Chlorinated Solvents

ATTENTION!

This WPS applies ONLY to partially full (for instance if the nozzle doesn't work) or full discarded aerosol cans described above. Empty/vented cans must be punctured and recycled. Aerosol cans that contain(ed) insecticides, herbicides, fungicides and chlorinated solvents must be managed differently. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 2.1)**

Step 1 Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Removable head drum

NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on DW containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels:** DOT CLASS 2, FLAMMABLE GAS
- **Accumulation Start Date (ASD)** – when waste was first added to container

An example of a properly labeled container is provided at the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product's SDS.
- Ensure the compatibility of wastes being added.
- Add aerosol cans, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the DW Accumulation Area IAW Chapter 4.


Step 5 Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.

ANTIFREEZE, SPENT - FOR RECYCLE

All Spent Antifreeze Mixtures that are not mixed with DW


ATTENTION!
<p><u>This WPS applies ONLY to spent antifreeze mixtures that are not mixed with hazardous waste. Antifreeze mixtures contaminated with hazardous waste must be managed differently.</u> Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept of Ecology – NOT CONSIDERED DW IF RECYCLED • Transportation – U.S. Department of Transportation – NOT A DOT HAZARDOUS MATERIAL

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Non-removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste. Typically, the original container should be used for accumulation of spent antifreeze.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Ensure containers are clearly labeled or marked with the following:</p> <ul style="list-style-type: none"> • contents of container: “SPENT ANTIFREEZE FOR RECYCLE” <p>The label should resemble the figure on the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add spent antifreeze, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to this waste stream.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

AQUEOUS PARTS WASHER SLUDGE

All Aqueous Parts Washer Sludge

ATTENTION!
<p><u>This WPS applies to sludge generated from aqueous parts washers.</u> Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 9)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label(s): DOT CLASS 9 (OTHER/MISCELLANEOUS) • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add wastes and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

ASBESTOS

Brake Shoes, Clutch Plates, Fire Suits, and Blankets

ATTENTION!

This WPS applies only to brake shoes, clutch plates, fire suits and blankets. It does not address asbestos abatement, construction, or any other type of asbestos-containing material (ACM).

WARNING: Asbestos is a known carcinogen by inhalation. Don't handle in a manner that could create dust. Do not handle asbestos unless you have been trained or are supervised by trained personnel.

Contact your supporting maintenance activity or the WMD Environmental Programs Office if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **NOT REGULATED BY WDOE**
- Transportation – U.S. Department of Transportation – **NOT A DOT HAZARDOUS MATERIAL**

Step 1 Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Double-bagged in a removable head drum

NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels and markings must clearly show:

- **“DANGER - CONTAINS ASBESTOS FIBER”**

An example of a properly labeled container is provided at the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product's SDS.
- Add asbestos wastes, and then secure the container.

Step 4 Accumulate Waste in an Approved Location


Step 5 Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.

All BATTERIES

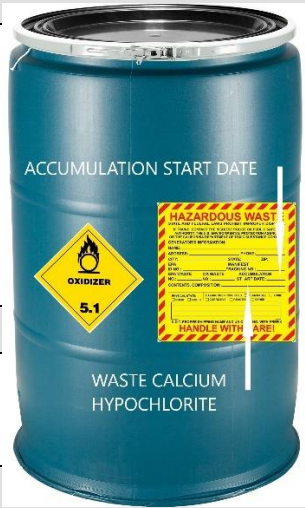
All Used Batteries

<p>ATTENTION! <u>Battery terminals must be individually covered</u> A separate container must be established for each type of battery:</p>	
<ul style="list-style-type: none"> • Lithium Ion • Lithium Polymer • Magnesium • Mercury 	<ul style="list-style-type: none"> • Nickel-Cadmium • Nickel-Metal • Alkaline • Lead Acid
<p>REGULATORY STATUS</p>	
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – UNIVERSAL WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 9) 	

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket with lid (separate bucket for each type of battery). <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on universal waste containers should clearly show:</p> <ul style="list-style-type: none"> • The words “UNIVERSAL WASTE” • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • <u>Tape battery terminals with masking tape and add to bucket.</u> 	
Step 4	Accumulate Waste in an Approved Location
<p><u>You can accumulate universal waste batteries for one year from the ASD.</u></p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

CALCIUM HYPOCHLORITE, DRY

ATTENTION!
This WPS applies to waste calcium hypochlorite. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 5.1)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Plastic container or cardboard box lined with plastic <p>NOTE: UN-approved containers are required for the accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 5.1, OXIDIZER • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p><u>Warning: Calcium Hypochlorite is a strong oxidizer.</u></p> <p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

SOIL/GRAVEL CONTAMINATED

Soil/Gravel, contaminated with POL (i.e., spill cleanup debris)

ATTENTION!	
<p><u>This WPS applies ONLY to soil/gravel contaminated with POL. Soil/gravel contaminated with other products must be characterized separately.</u> Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>	
REGULATORY STATUS	
<ul style="list-style-type: none"> Environmental – WA Dept. of Ecology – NON-HAZARDOUS WASTE Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT 	
Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> Approved Container: <u>Small Amounts</u> – Clear plastic trash bags (double-bagged) <li style="padding-left: 40px;"><u>Large Amounts</u> – Removable head drum 	
Step 2	Prepare, Mark and Label the Container
<p>Labels or markings should clearly show:</p> <ul style="list-style-type: none"> The words “NON-HAZARDOUS WASTE” <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> Wear the proper PPE listed on the absorbed product’s SDS. Add soil/gravel to container, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to containers of non-hazardous waste.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



FUEL FILTERS - MOGAS

All Spent MOGAS Fuel Filters


ATTENTION!
<p>This WPS applies ONLY to spent MOGAS fuel filters.</p> <p>Drain free-flowing fuel from filters and manage IAW the WPS for Off-Spec Gasoline.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – HAZARDOUS MATERIAL (Class 4.1)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 4, FLAMMABLE SOLID • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



FUEL FILTERS – METAL ENCASED – DIESEL/JP-8/OIL FOR RECYCLE

ATTENTION!
<p><u>This WPS applies to metal-encased oil filters as well as metal-encased diesel and JP-8 fuel filters.</u> Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p> <p>Drain free-flowing fuel from filters and manage IAW the WPS for Off-Spec JP-8/Diesel.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NOT CONSIDERED DW IF RECYCLED • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Clearly label or mark the container with the following information:</p> <p>Contents of container: SPENT FUEL FILTERS FOR RECYCLE or SPENT OIL FILTERS FOR RECYCLE (if container is only used for oil filters)</p> <p>The container should resemble the figure on the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product's SDS. • Add waste, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to this waste stream.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

FUEL FILTERS – OPEN ELEMENT – DIESEL/JP-8/OIL

Open-element diesel and JP-8 fuel filters and open-element oil filters

ATTENTION!

This WPS applies to open-element diesel and JP-8 fuel filters as well as open-element oil filters. Fuel filters not described here must be managed differently. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

Drain free-flowing fuel from filters and manage IAW the WPS for Off-Spec JP-8/Diesel or Used Oil as appropriate.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 4.1)**

Step 1 Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Removable head drum

NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on DW containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels:** DOT CLASS 4, FLAMMABLE SOLID
- **Accumulation Start Date (ASD)** – when waste was first added to container

An example of a properly labeled container is provided at the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product's SDS.
- Add waste, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the DW Accumulation Area IAW Chapter 4.

Step 5 Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.

FUEL - OFF-SPEC DIESEL/JP-8

All Off-spec Diesel or JP-8 Fuels

ATTENTION!
This WPS applies ONLY to off-spec diesel and JP-8 fuels. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) for assistance regarding other types of fuel.
REGULATORY STATUS
<ul style="list-style-type: none"> Environmental – WA Dept. of Ecology – NOT CONSIDERED DANGEROUS WASTE IF RECYCLED Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 3)


Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> Approved Container: Removable head plastic or metal drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Clearly label or mark the container with the following information:</p> <ul style="list-style-type: none"> Contents of container Risk label: DOT CLASS 3, FLAMMABLE LIQUID <p>The container should resemble the figure on the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> Wear the proper PPE listed on the product's SDS. Ensure the compatibility of wastes being added. Add fuel, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to this waste stream.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



FUEL – OFF-SPEC MOGAS

All Off-Spec MOGAS

ATTENTION!
This WPS applies ONLY to off-spec or unusable gasoline (MOGAS).
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NOT CONSIDERED DANGEROUS WASTE IF RECYCLED • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 3)

Step 1	Select an Approved Container	
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Closed-head plastic or metal container <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>		
Step 2	Prepare, Mark and Label the Container	
<p>Clearly label or mark the container with the following information:</p> <ul style="list-style-type: none"> • Contents of the container • Risk label: DOT CLASS 3, FLAMMABLE LIQUID <p>The container should resemble the figure on the right.</p>		
Step 3	Put Waste in the Container	
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product's SDS. • Add spent fuel, and then secure the container. 		
Step 4	Accumulate Waste in an Approved Location	
<p>Accumulate time limits do not apply to this waste stream.</p>		
Step 5	Turn-in Procedures	
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 		

GREASE, OFF-SPEC

ATTENTION!	
<p>This WPS applies ONLY to grease. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>	
REGULATORY STATUS	
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NON-HAZARDOUS WASTE • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT 	
Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum 	
Step 2	Prepare, Mark and Label the Container
<p>Labels or markings should clearly show:</p> <ul style="list-style-type: none"> • The words “NON-HAZARDOUS WASTE” <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to this waste stream.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



LIGHT BULBS

Fluorescent, metal halide, mercury vapor, neon, high pressure sodium, fluorescent, halogen

ATTENTION!

This WPS does not apply to broken bulbs, which must be managed differently. Contact your supporting maintenance activity or the Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **UNIVERSAL WASTE**
- Transportation – U.S. Department of Transportation – **NOT A DOT HAZARDOUS MATERIAL**

Step 1

Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Place in cardboard box or fiberboard drum. Used light tubes can be stored in their original box but must be labeled as shown below.

Step 2

Prepare, Mark and Label the Container

Clearly label or mark the container with the following information:

- The words “**UNIVERSAL WASTE**”
- **Accumulation start date (ASD)** - when waste was first added to container

The label should resemble the figure on the right.



Step 3

Put Waste in the Container

- Wear gloves when handling light bulbs.
- Add waste, and then secure the container.

Step 4

Accumulate Waste in an Approved Location

You can accumulate light tubes for one year from the ASD.


Step 5

Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.


M-256 DETECTOR KITS

ATTENTION!
This WPS applies ONLY to M-256 Detector Kits. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – HAZARDOUS MATERIAL (Class 3)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: DOT CLASS 3, FLAMMABLE LIQUID • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

M-258A1 / M-58A1 DECONTAMINATION KITS

ATTENTION!
This WPS applies to M-258A1 and M-58A1 Decontamination Kits. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 3)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 3 FLAMMABLE LIQUID • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

M-272 CHEMICAL AGENT WATER TEST KITS


ATTENTION!

A separate container must be established for each type of water test kit:

- Red tube (potassium cyanide)
- Blue Tube (mercuric cyanide)
- Orange Tube (arsenic)
- White Tube (1-naphthyl-N-methylcarbamate)
- Yellow Tube (epichlorohydrin)
- Copper packet (copper sulfate)

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 6.1)**

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket (separate bucket for each type of test kit). 	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 6, TOXIC • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<p>Wear the proper PPE listed on the product’s SDS.</p>	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn into your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

MONITORING WELL PURGE WATER

All monitoring well purge water not otherwise characterized

ATTENTION!
This WPS applies to purge water from resource management monitoring wells. Contact the WMD Environmental Programs Office for assistance (253-512-8464).
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NOT REGULATED BY WDOE • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT

Step 1	Select an Approved Container
Approved Container: Removable head drum	
Step 2	Prepare, Mark and Label the Container
Clearly label or mark the container with the following information: <ul style="list-style-type: none"> • Contents of container • The words “NON-REGULATED WASTE” or a Contractor label <p>The container should look similar to the figure on the right.</p>	
Step 3	Put Waste in the Container
Does not apply (handled by contractor).	
Step 4	Accumulate Waste in an Approved Location
Containers are to be placed within 10 feet of associated monitoring well.	
Step 5	Turn-in Procedures
Disposal is managed by the WMD EPO.	



MRE FLAMELESS RATION HEATERS

Bulk quantities of Flameless Ration Heaters


ATTENTION!

This WPS applies ONLY to bulk quantities of Flameless Ration Heaters.

Flameless Ration Heaters issued to soldiers for use in the field at military installations or in a temporary or permanent residential setting are exempt from hazardous waste regulation as household hazardous waste. Under these circumstances, soldiers may dispose of waste Flameless Ration Heaters as non-hazardous solid waste, **however the heaters must be activated**. Double-bag MRE heaters and dispose of them in the dumpster.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 4)**

Step 1	Select an Approved Container
<p>If possible, use the original container to turn in case lots of unused MRE heaters. NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 4, DANGEROUS WHEN WET • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p><u>WARNING: Flameless Ration Heaters contain water-reactive magnesium. Keep MRE heaters dry; saturation with water produces heat and trace amounts of highly flammable hydrogen gas.</u></p> <p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

NBC PROTECTIVE MASK FILTERS

M17, M-40 and M-48 Protective Mask Filters

ATTENTION!

Protective mask filters (M-17 and M-40) contain trace amounts of chromium.

This WPS applies ONLY to the mask filters described above. Contact your supporting maintenance activity or the WMD Environmental Programs Office if you need assistance.

The following information is also helpful to remember:

- C2A1 (green body) canisters can be disposed of in the trash (Remember: “Green is Good.”).
- C2 (black body) canisters must be managed as DW (Remember: “Black is Bad.”).

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 9)**

Step 1 Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Removable head drum or cardboard box.

NOTE: UN-approved containers are required for proper accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on DW containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label:** DOT CLASS 9, OTHER/MISCELLANEOUS
- **Accumulation Start Date (ASD)** – when waste was first added to container

An example of a properly labeled container is provided at the right.



Step 3 Put Waste in the Container

- Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location


Accumulate waste in the DW Accumulation Area IAW Chapter 4.

Step 5 Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.


NIGHT VISION IMAGE INTENSIFIER TUBES

ATTENTION!
<p><u>Night vision intensifier tubes contain cadmium and lead. This WPS only applies to demilitarized tubes and does not apply to intact tubes. Intact tubes must be turned into the USPFO for demilitarization.</u></p> <p>Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 9)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum or cardboard box <p>NOTE: UN-approved containers are required for proper accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 9, OTHER/MISCELLANEOUS • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

OIL CANS, CRUSHED – FOR RECYCLE

ATTENTION!
<p><u>This WPS applies to ONLY to crushed oil cans.</u> Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – NOT CONSIDERED DW IF RECYCLED • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head metal container <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Clearly label or mark the container with the following information:</p> <ul style="list-style-type: none"> • contents of container: CRUSHED OIL CANS FOR RECYCLE <p>The container should resemble the figure on the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product's SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulation time limits do not apply to this waste stream.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

PAINT BOOTH FILTERS

All Spent Paint Booth Filters from CSMS

ATTENTION!

This WPS applies ONLY to paint booth filters from CSMS. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 9)**


Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: DOT CLASS 9, OTHER/MISCELLANEOUS • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



PAINT RELATED MATERIAL, LIQUID – NON-LATEX

All waste non-latex paint and primer, paint thinner, lacquer, and liquids from punctured aerosol cans

ATTENTION!
<p>This WPS applies <u>ONLY</u> to non-latex paint and primer (i.e., CARC), paint thinner, lacquer, and liquids from punctured aerosol cans. Solid non-latex paint-related material (i.e., brushes, rags, paint cans) must be <u>managed according to a different WPS</u>. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 3)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable or non-removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: DOT CLASS 3, FLAMMABLE LIQUID • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

PAINT RELATED MATERIAL, SOLIDS – NON-LATEX

All solid non-latex paint-related material, i.e., brushes, rollers, paint cans, rags

ATTENTION!

This WPS applies ONLY to solid debris (i.e., brushes, rags, paint cans) used with non-latex paint and primer (i.e., CARC, paint thinner, lacquer, and liquids from punctured aerosol cans). Liquid non-latex paint-related material must be managed according to a different WPS. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 3)**

Step 1 Select an Approved Container

Determine if a container has already been established for your waste. If one has, skip to Step 3.

- Approved Container: Removable or non-removable head drum

NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on DW containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label:** DOT CLASS 3, FLAMMABLE LIQUID
- **Accumulation Start Date (ASD)** – when waste was first added to container

An example of a properly labeled container is provided at the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product’s SDS.
- Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the DW Accumulation Area IAW Chapter 4.


Step 5 Turn-in Procedures

- **Units** complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5.
- **Maintenance activities** contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.

LATEX PAINT

Off-Spec Latex Paint and Primer

ATTENTION!
This WPS applies ONLY to latex paint and primer. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept of Ecology – STATE-ONLY DANGEROUS WASTE (WA TOXIC) • Transportation – U.S. Department of Transportation – NOT REGULATED BY DOT

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head metal or plastic drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: WASHINGTON STATE TOXIC • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
Accumulate waste in the DW Accumulation Area IAW Chapter 4.	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

SOLVENT FILTERS (PD-680 TYPE II OR III)

All filters used with PD-680 Type II or III solvent

ATTENTION!
This WPS applies ONLY to solvent filters used with PD 680 Type II or III solvent. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – DOT HAZARDOUS MATERIAL (Class 9)


Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable-head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: WASHINGTON STATE TOXIC • Accumulation Start Date (ASD) – when waste was first added to container An example of a properly labeled container is provided at the right. 	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



SOLVENT, USED (PD-680 TYPE II OR III)

All Spent PD-680 Type II or III

ATTENTION!
<p>This WPS applies ONLY to spent PD-680 Type II or III solvent. Other solvents must be managed differently. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Dept. of Ecology – STATE-ONLY DANGEROUS WASTE (WA TOXIC) • Transportation – U.S. Department of Transportation – NOT A DOT HAZARDOUS MATERIAL

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Non-removable head metal or plastic drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk label: WASHINGTON STATE TOXIC • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add solvent then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

UNKNOWN WASTES

All Unknown Wastes

ATTENTION!
This WPS applies to all unknown wastes. Immediately contact the WMD Environmental Programs Office upon discovery (253-512-8464).
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – Washington Department of Ecology – HAZARDOUS UNTIL PROVEN OTHERWISE • Transportation – U.S. Department of Transportation – HAZARDOUS UNTIL PROVEN OTHERWISE

Step 1	Select an Approved Container
<ul style="list-style-type: none"> • Approved Container: Original container if in good condition. Otherwise, use an over-pack drum. 	
Step 2	Prepare, Mark and Label the Container
<p>Labels should clearly show:</p> <ul style="list-style-type: none"> • The words “UNKNOWN WASTE PENDING ANALYSIS” • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Accumulation Start Date (ASD) – when waste was first discovered or when waste was first added to the container • “Pending Analysis” hold tag <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
Wear appropriate PPE.	
Step 4	Accumulate Waste in an Approved Location
Accumulate waste in the DW Accumulation Area IAW Chapter 4.	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units contact your supporting maintenance activity for disposal instructions. • Maintenance activities contact the WMD Environmental Programs Office for disposal options (253-512-8464). Follow procedures in Chapter 5 once the disposal route is determined. 	



USED OIL FOR RECYCLE

All Used Oil

ATTENTION!

Used motor oil (petroleum or synthetic), transmission fluid, brake fluid, lubricating oil, compressor oil, gear and metal working fluids without chlorinated compounds, are all considered used oil and can be mixed without designating the mixture as DW. If used oil is contaminated with DW such as solvent, it is a DW. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) for assistance.

REGULATORY STATUS


- Environmental – WA Dept of Ecology – **NOT CONSIDERED DW IF RECYCLED**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL**

Step 1	Select an Approved Container
	<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Plastic or metal non-removable head drum <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>
Step 2	Prepare, Mark and Label the Container
	<p>Clearly label or mark the container with the following information:</p> <ul style="list-style-type: none"> • contents of container: USED OIL FOR RECYCLE <p>The container should resemble the figure on the right.</p>
Step 3	Put Waste in the Container
	<ul style="list-style-type: none"> • Wear the proper PPE listed on the product's SDS. • Add used oil and then secure the container.
Step 4	Accumulate Waste in an Approved Location
	<p>Accumulation time limits do not apply to this waste stream.</p>
Step 5	Turn-in Procedures
	<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined.



PHARMACEUTICAL WASTE

ATTENTION!
<p><u>With the exception of controlled substances, all open or partially used pharmaceuticals are considered DW</u> and must be managed IAW this profile. Most waste pharmaceuticals can be collected into one container; however, albuterol inhalers and silver nitrate swabs must be segregated into a different container (refer to the WPS for albuterol inhalers and silver nitrate swabs).</p> <p>For more detail about pharmaceutical waste management, refer to Appendix D of the WMD DW Management Plan. You may also call the Environmental Programs Office at 253-512-8464 if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – HAZARDOUS MATERIAL (Class 3, Class 6)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on pharmaceutical waste containers should clearly show:</p> <ul style="list-style-type: none"> • The words “NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE” • Risk labels: DOT CLASS 3, FLAMMABLE LIQUID; DOT CLASS 6, TOXIC • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<p>Add waste and then secure the container.</p>	
Step 4	Accumulate Waste in an Approved Location
<ul style="list-style-type: none"> • Accumulate waste in the DW Accumulation Area IAW Ch 4. • <u>You can accumulate pharmaceutical waste for 180 days from the ASD.</u> 	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

PHARMACEUTICAL WASTE – ALBUTEROL INHALERS

ATTENTION!
<p>The profile applies <u>ONLY</u> to discarded albuterol inhalers.</p> <p>For more detail about pharmaceutical waste management, refer to Appendix D of the WMD DW Management Plan. Call the Environmental Programs Office at 253-512-8464 if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – HAZARDOUS MATERIAL (Class 2.2)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on pharmaceutical waste containers should clearly show:</p> <ul style="list-style-type: none"> • The words “NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE” • Risk label: DOT CLASS 2, NON-FLAMMABLE GAS • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<p>Add waste and then secure the container.</p>	
Step 4	Accumulate Waste in an Approved Location
<ul style="list-style-type: none"> • Accumulate waste in the DW Accumulation Area IAW Ch 4. • <u>You can accumulate pharmaceutical waste for 180 days from the ASD.</u> 	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



PHARMACEUTICAL WASTE – SILVER NITRATE SWABS

ATTENTION!
<p>The profile applies <u>ONLY</u> to silver nitrate swabs.</p> <p>For more detail about pharmaceutical waste management, refer to Appendix D of the WMD DW Management Plan. Call the Environmental Programs Office at 253-512-8464 if you need assistance.</p>
REGULATORY STATUS
<ul style="list-style-type: none"> • Environmental – WA Department of Ecology – DANGEROUS WASTE • Transportation – U.S. Department of Transportation – HAZARDOUS MATERIAL (Class 5.1)

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE” • Risk label: DOT CLASS 5.1, OXIDIZER • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<p>Add waste and then secure the container.</p>	
Step 4	Accumulate Waste in an Approved Location
<ul style="list-style-type: none"> • Accumulate waste in the DW Accumulation Area IAW Ch 4. • <u>You can accumulate pharmaceutical waste for 180 days from the ASD.</u> 	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



WEAPONS CLEANING DEBRIS

Rags, patches etc. contaminated with CLP

ATTENTION!

Check the manufacture date of the Break-Free/CLP. If the manufacture date is after 1 Jan 94, manage the debris IAW this profile sheet. Debris contaminated with other products or Break-Free/CLP with a manufacture date before 1 Jan 94 must be managed differently. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **REGULATED BY DOT -CLASS 9, PG III**

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: <u>Small Amounts</u> – UN-approved plastic bucket <u>Large Amounts</u> – UN-approved Removable head drum 	
Step 2	Prepare, Mark and Label the Container
<p>Labels or markings should clearly show:</p> <ul style="list-style-type: none"> • The words “HAZARDOUS WASTE” or “DANGEROUS WASTE” • The words “LEAD CONTAMINATED DEBRIS” • Hazard Class Labels: DOT CLASS 9, OTHER/MISCELLANEOUS TOXIC TO AQUATIC LIFE <p>An example of a properly labeled container is provided at the right.</p>	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste, and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>90 days.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	



PCB CONTAINING BALLASTS


All ballasts manufactured prior to July 1, 1998 that are **not** labeled “No PCBs”

ATTENTION!

This WPS applies ONLY to light ballasts that cannot be verified as free of PCBs. Contact your supporting maintenance activity or the WMD Environmental Programs Office (253-512-8464) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 9)**

Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: Removable head drum or bucket <p>NOTE: UN-approved containers are required for accumulation and transportation of this waste.</p>	
Step 2	Prepare, Mark and Label the Container
<p>Labels on DW containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels: DOT CLASS 9, OTHER/MISCELLANEOUS CAUTION, CONTAINS PCBs • Accumulation Start Date (ASD) – when waste was first added to container <p>An example of a properly labeled container is provided at the right.</p>	
	
Step 3	Put Waste in the Container
<ul style="list-style-type: none"> • Wear the proper PPE listed on the product’s SDS. • Add waste and then secure the container. 	
Step 4	Accumulate Waste in an Approved Location
<p>Accumulate waste in the DW Accumulation Area IAW Chapter 4.</p>	
Step 5	Turn-in Procedures
<ul style="list-style-type: none"> • Units complete a MIL Form 3161a and turn in to your supporting maintenance activity IAW Chapter 5. • Maintenance activities contact your regional supervisor for disposal options. Follow procedures in Chapter 5 once the disposal route is determined. 	

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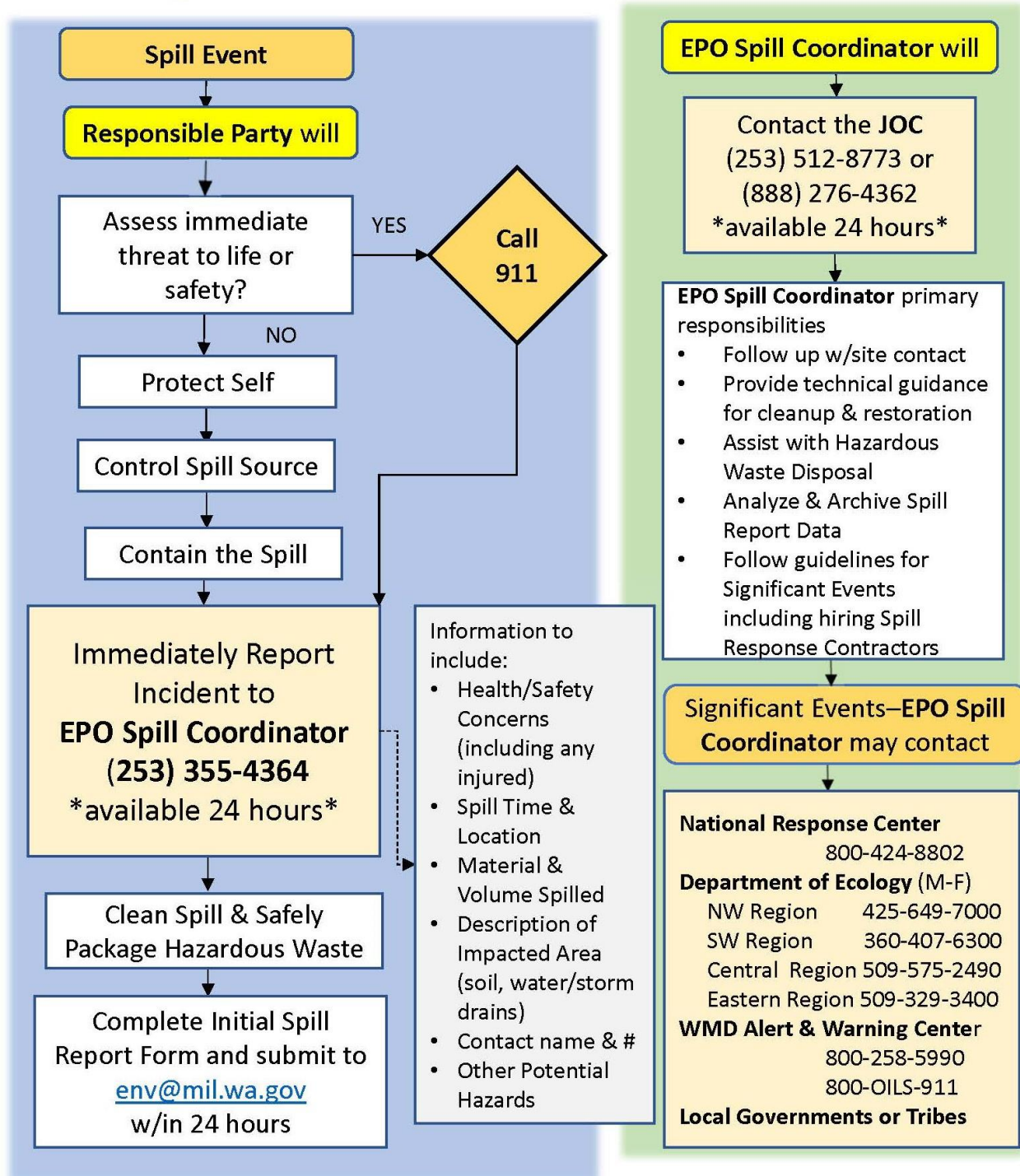
Appendix B – Spill Response Procedures

Please refer to the current version of the Unified Washington Military Department and National Guard Policy No. 10-04

The current Spill Response Flow Chart is included in this Appendix



WMD Environmental Programs Office Spill Response Flow Chart



Last updated: 08/07/2020, supersedes all previous versions

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Appendix C – Managing Dangerous Waste in the Field

DW and hazardous material management during field training exercises is just as important as in cantonment. The same management principles used in cantonment shall apply with a few exceptions as identified in this appendix.

Management of DWs and HM in the field occurs throughout the following stages:

- Preparation & Planning
- Training (IDT, AT)
- Close-Out

This appendix provides detailed instructions for managing DW and HM through each of the above stages. Many of the instructions are adopted from Ft. Lewis Regulation 200-1 (FL 200-1), *Environmental Protection and Enhancement*, January 1997. FL 200-1 applies to all tenants and units operating on Ft. Lewis and YTC and to WAARNG personnel. The WAARNG also adopts FL 200-1 waste and material guidelines for operations conducted at Local Training Areas and Camp Murray. This appendix applies to the following training areas:

- All local training areas
- Camp Murray
- Fort Lewis
- YTC
- Other host installations, unless their requirements are more stringent

Preparation & Planning

Units and activities must consider hazardous material and DW management while planning their training. Units should address the following issues before movement to the field:

- Units should appoint a Point of Contact (POC) to coordinate environmental matters. The POC should be a knowledgeable individual from the planning headquarters who will be available from initial planning until completion of the exercise
- Transportation routes shall be chosen to minimize impact of potential spills to surface and groundwater
- Units must have hazardous material containers properly marked and labeled
- Vehicles containing HM must have appropriate placards, if applicable
- Drivers of HM must be trained IAW DOT standards
- Units must obtain supplies to prevent and prepare for spills to the environment
- Units must obtain supplies to manage DWs, such as containers, labels, etc.
- Units must have a current SDS for each product taken to the field

Training (IDT/AT)

The procedures outlined below apply to units and activities in the field performing any exercise involving these HM and wastes. Management will require minimal effort if prior planning is adequate.

Management of Hazardous Materials (HM)

- Step 1. Locate HM storage areas at least 100 meters away from lakes, streams, wetlands and other water bodies. Select areas that do not drain into water bodies.
- Step 2. Prepare a site-specific spill contingency plan. A sample plan is included at the end of this appendix and is reproducible. Have available appropriate spill response supplies, tools and equipment on site for the materials on-hand. Designate and train personnel to implement the plan.
- Step 3. Provide secondary containment for HM that are opened and in-use.
- Step 4. Perform weekly inspections on HM storage areas using the Field Weekly Inspection Checklist found at the end of this appendix.

Generation and Accumulation of Dangerous Wastes (DW)

Regulations that govern the generation and accumulation of DW are stringent and apply to field training situations just as they do in the cantonment area. The following are particularly applicable to DW accumulation during field training:

- Step 1. Co-locate the DWAA and the HM storage area, provided the materials and wastes are compatible and there is a minimum of 30 inches separation between the two. See Chapter 4 for assistance with determining compatibility.
- Step 2. Provide secondary containment for DW accumulation. Secondary containment for a DWAA is a regulatory requirement. The use of “Poly-safetypack” secondary containment systems is recommended. These systems are available on a loan (first come, first served) basis from the Fort Lewis Hazardous Waste Management Section (967-4786) or from DENR at YTC (577-3402).
- Step 3. Properly label DW containers IAW Waste Profile Sheets in Appendix A.
- Step 4. Conduct weekly DWAA inspections using the Field Weekly Inspection Checklist found at the end of this appendix.

Close-Out

DW Turn-In on Federal Installations

All DW that is generated on a Federal installation (Fort Lewis, YTC, Fairchild AFB) will be turned in at that installation. Contact information and procedures for turn-in at each installation are found in Chapter 5 of this.

Transportation of HM

The following requirements apply to the transportation of HM:

- Vehicles used for transportation will meet the safety requirements of AR 385-55, FL Reg

55-2, and appropriate Field Manuals (FMs) and Technical Manuals (TMs). Operators will meet the requirements of AR 600-55 and FL Reg 55-2.

- Containers will be transported in an upright position and will be secured/braced during transportation to avoid spills. Containers will be stacked no more than one tier high.
- Fifty-five (55) gallon drums will be transported no more than three to a pallet; 85-gallon drums will be no more than two to a pallet; 30-gallon cans will be no more than four to a pallet. Pallets will be stacked no more than one tier high.
- When transporting HM on or off-post, the vehicle operator will have a complete list of the HM in his/her possession. When the operator is not in the vehicle, the list will be kept next to the operator's door. In the event of a spill or material release, the list will be provided to the emergency response personnel arriving on the scene.
- Units/activities will ensure that operators of vehicles transporting HM on or off-post are properly trained and tested under the Army Licensing Program and are briefed on procedures to be taken in the event of a spill or material release.
- Any vehicle transporting HM over a public highway (including public highways on the installation or sub-installation) must have proper U.S. DOT container marking/labeling and vehicle placarding. Units/activities requiring information and assistance concerning proper marking/labeling and placarding will contact the USPFO Warehouse (253) 512-8883.

Forms for Dangerous Waste Management in the Field

The following forms are included in this section, and begin on the next page:

- Field Weekly Inspection Checklist
- Site Specific Spill Plan Template

UNIT/ACTIVITY: _____ **DATE:** _____

FIELD WEEKLY INSPECTION CHECKLIST

This checklist will be used for inspection where HM (HM) and DWs (DW) are stored. These locations include assembly areas, supply trucks, motor pools, paint lockers, field sanitation boxes, maintenance and communication sections or any other sites where HM and DW are stored.

HAZARDOUS MATERIAL STORAGE AREAS	GO	NO GO	COMMENTS
Are incompatible materials segregated, e.g., corrosives and oxidizers segregated from flammable products and stored on ground level? (See storage incompatibility charts in Chapter 5)			
Are flammables stored away from sources of heat, ignition, flames, or sparks?			
Are SDSs available on site for all HM stored?			
Is a spill plan posted, and is a fully stocked spill kit readily available?			
Are product containers serviceable? (Not leaking, no dents or excessive rust, and lid(s) tightly closed)			
Are containers within shelf life expiration dates?			
Are new products segregated from “in-use” containers, and are stocks rotated on a “first opened, first used” basis?			
Do open “in-use” containers have secondary containment?			
DW ACCUMULATION AREAS	GO	NO GO	COMMENTS
Were all DW containers currently in use received from the training installation?			
Are containers positioned so labels can be easily read?			
Are containers free from leaks, excessive rust, damage, or excessive spillage/residue on the outside of the container? Are leaks into secondary containment cleaned up?			
Has any DW container exceeded its turn-in date?			

FIELD WEEKLY INSPECTION CHECKLIST (CONTINUED)

DW ACCUMULATION AREAS	GO	NO GO	COMMENTS
Are container lids (bungs) properly installed and (wrench) tight to prevent leakage if the container is overturned?			
When stored together, do incompatibles, flammables, corrosives, or oxidizers have physical barriers to prevent mixing?			
Are drums containing flammables properly grounded?			
Is there a minimum 30-inch separation between aisles of containers, and are rows of drums no more than two wide?			
Is the DW segregated from new material by at least 30-inches?			
Have DW storage areas been inspected to verify there are no spills, damaged or leaking containers, expired shelf-life items, or unsafe storage?			

INSPECTOR: _____ **SIGNATURE:** _____

SAMPLE UNIT SPILL CONTINGENCY PLAN

The following is an example of what should be included in a spill contingency plan prepared by units conducting bulk POL storage and refueling operations during training at the YTC. The sample can be adapted to cover the unit's particular operations and specific POL materials that will be handled.

UNIT DESIGNATION

OFFICE SYMBOL

DATE

MEMORANDUM FOR Commander, Yakima Training Center (YTC), Yakima, WA 98901-9399.

SUBJECT: Spill Contingency Plan for Bulk POL Operations during Training at the YTC

1. GENERAL: The (*Unit Designation*) will deploy to YTC to conduct field training during the period (*list dates*). During the training rotation, various types of bulk POL operations will be conducted. These include: Resupply of JP_ using the Aerial Bulk Fuel Delivery System (ABFDS); forward area refueling of ground vehicles in a tactical environment; and (*list other major POL operations*). During all operations, care will be taken to avoid spills. This plan lists the precautions that will be taken to prevent spills, and actions to be taken if a spill occurs.
2. TYPES OF BULK STORAGE TO BE USED AND POL STORED: (*List types of POL materials to be used, e.g., MOGAS, JP8, Diesel, by field storage system*):
 - a. MOGAS in tank and pump units (1,200 Gallon).
 - b. Diesel in trailer mounted pods (600 Gallon).
 - c. JP8 in semi-trailer (5,000 Gallon).
 - d. JP4 in fuel blivit (500 Gallon).
 - e. Diesel in collapsible tank (10,000 gallon).
 - f. JP4 in Aerial Bulk Fuel Delivery System (ABFDS) (3,000 gal/tank, 6,000 gal per C-130 aircraft).
 - g. Kerosene in 5-gallon cans and 55-gallon drums.
3. PRIMARY SPILL DANGER: *State the unit assessment of the primary spill danger, e.g., "The primary spill danger is from a puncture to a fabric tank, high pressure line break, or overfilling of a tank."*
4. PLANNED LOCATIONS FOR BULK STORAGE AND REFUELING OPERATIONS:
 - a. List of known/planned locations by CTM grid coordinates (UTM locations):

_____ _____ _____ _____
_____ _____ _____ _____

- b. Additional information will be provided as it becomes available.

5. PREVENTIVE MEASURES FOR BULK POL STORAGE/REFUEL OPERATIONS:

- a. All refueling equipment will be inspected for serviceability prior to use.
- b. All personnel responsible for dispensing fuel will be trained in spill prevention and control techniques.
- c. Drip pans will be used at all fuel receiving and issue points.
- d. When fabric tanks with a capacity greater than 500 gallons are used, at least one tank per product type will be empty to serve as a backup tank should a tank in use develop a leak.
- e. When fabric tanks with a capacity greater than 500 or more gallons are used, they will be enclosed in an earthen berm with a capacity of 1½ times the capacity of the fabric tank (500 gal. + 250 gal. = 750 gal.). Impermeable berm liners will be used.
- f. All fuel containers will be carefully monitored to avoid overfilling.
- g. During and after all fuel operations, all drains, outlets, valves, couplings, fittings, and the area around the tanks and issue/receiving points will checked for leaks and spills.
- h. All valves will be closed when a fuel system is not in use.
- i. The fuel system will be monitored to avoid tampering.
- j. Safety equipment for both fire prevention and spill control will be maintained at each refueling point. This equipment will include, but is not limited to:
 - (1) Fire extinguishers at all pumps, receiving points, and issue points.
 - (2) Drip pans during transfer of POL to 55-gallon drums or 5-gallon cans.
 - (3) Absorbent materials and other spill containment equipment as listed below:
 - (a) Oil absorbing pads.
 - (b) Shovels to remove contaminated soil.
 - (c) Emergency repair kits for collapsible tanks.

_____ (*other*)

- (4) The following engineering assets are available and will be used if required to remove large amounts of contaminated soil or construct dams/barriers/berms as needed:

_____ (*list equip*)

6. SPILL RESPONSE ACTIONS:

- a. The spilling of any of POL product will be considered reportable regardless of quantity.
- b. Spills will be reported by the fastest means to the YTC Fire Department. The Fire Department will provide response guidance, will inform the Environment and Natural

Resources Division (ENRD), and will provide initial responders to the scene if necessary. The ENRD will determine follow-up spill response required and will provide required cleanup guidance.

- (1) Spills in the Cantonment Area will also be immediately reported to the Operations Center by calling 577-3280.
 - (2) Spills occurring in the Range Area will also be immediately reported to Operations Center by radio, or by telephone at 577-3280.
- c. The following information will be provided when reporting a spill:
- (1) If there is an immediate threat to human health or safety.
 - (2) Time spill occurred or was first observed.
 - (3) Where spill occurred and unit's present location, if unit is moving.
 - (4) Type of material spilled.
 - (5) Estimated quantity of material spilled, or if still leaking, rate of release.
 - (6) Environmental conditions such as wind direction and speed, precipitation, cloud cover. etc.
 - (7) Description of the area impacted or likely to be affected such as river or stream banks, private properties, and wildlife areas.
 - (8) Cause of spill.
 - (9) Actions being taken to contain and control the spill.
 - (10) Agencies already notified (e.g., E911 or local fire department).
 - (11) Name and telephone number of the unit POC.
- d. Immediate action will include:
- (1) Insuring safety of personnel at the scene.
 - (2) Stopping the flow of spilled material and confining the spill if it can be safely done. Particular attention will be given to preventing the spill from entering surface or groundwater resources.
- e. The response actions, type and amount of resources to be committed for spill response will depend on the nature and magnitude of the spill.
- (1) For small spills that do not reach water bodies, use of absorbent pads or granular absorbent will be implemented. Guidance will be obtained from the ENRD concerning soil excavation and disposal of contaminated material.
 - (2) For larger spills that have reached or could potentially reach surface or groundwater, or could otherwise cause serious environmental damage, the primary objective will be to minimize the amount of material that enters the water body. If the spill enters surface water such as a stream or lake, every effort will be made to minimize the amount of surface water that is contaminated. Guidance will be requested from ENRD for appropriate response actions, which may require the construction of catchment basins, ditches, or dams. Once the spill is confined,

guidance will be requested from the ENRD for cleanup and disposal of contaminated material.

- f. If a spill involves flammable or combustible organic liquids (fuel), the following procedures will be used:
 - (1) The incident area will be isolated with engineer tape, rope, or other available material.
 - (2) Spill Confinement: The spilled material will be enclosed and prevented from further spreading with a dike of solid absorbent material (soil).
 - (3) Spill Cleanup: These actions will be coordinated with ENRD. Absorbent will be used to soak up all the spilled liquid. Since most organic liquids are extremely flammable, all sources of ignition or sparking will be avoided. Contaminated material will be scooped up with a non-sparking shovel and placed in the proper spent waste container obtained from the ENRD. The ENRD will provide proper coding and labeling of the waste containers.
 - (4) Safety Precautions: Safety goggles, rubber gloves, and helmets will be worn.
 - (5) Fire Extinguishers: Carbon dioxide and dry chemical extinguishers will be used. In case of fire, nearby fuel containers will be moved from the area. If this is not possible, the containers (provided it can be safely done) will be cooled with water to prevent ignition and possibility of pressure increase to the containers.
 - (6) Emergency: For emergency information in response to accidental poisoning or other hazardous effects of the spilled material, the Installation Safety Office will be contacted at 577-3216.
 - (7) Disposal of contaminated material from spill cleanup efforts will be coordinated with the ENRD.

7. UNIT POC AND TELEPHONE NUMBER

_____/s/
COMMANDER

Appendix D - Pharmaceutical Waste Management

The term pharmaceutical refers to any controlled substance, prescription drug or over-the-counter drug. **All items on the WAARNG formulary are considered pharmaceuticals**, including but not limited to pills and capsules; powders; liquids; vials; creams/lotions; eye drops; inhalers; injectable liquids; patches; vitamin and mineral preparations etc.

Most pharmaceuticals generated by WMD activities (i.e., annual medical or dental screenings and immunizations; AT; Deployment) designate as DW if discarded and must be managed IAW applicable federal, state and local regulations.

Pharmaceutical Waste Management Policy

WMD manages pharmaceutical waste using the *Interim Enforcement Policy for Pharmaceutical Waste* (Ecology Publication #07-04-024). This means as long as certain rules are followed, pharmaceutical waste generated by WMD activities is not subject to the full requirements of the DW Regulations ([WAC 173-303](#)). The WMD has adopted the following management practices to comply with the requirements of the *Interim Enforcement Policy*:

- Viable pharmaceuticals are returned to the Madigan Class VIII Warehouse.

A viable pharmaceutical is a pharmaceutical that can be used for its intended purpose or returned to a manufacturer, wholesaler, or reverse distributor for credit

- Non-viable pharmaceuticals are collected at the point of generation and managed as DW IAW this Appendix.

A non-viable pharmaceutical is a pharmaceutical that cannot be used for its intended purpose, sold, or returned to the manufacturer, wholesaler, or reverse distributor for credit.

An easy-to-follow flowchart, which simplifies these processes, can be found in Figure D-1 of this appendix.

Managing Non-Creditworthy (Opened or Partially Used) Pharmaceuticals as Dangerous Waste

Step 1. Collect all non-creditworthy pharmaceuticals (opened, partially used, or “Code 3”-listed), and accumulate IAW the requirements listed in Table D-1 and Table D-2 of this appendix.

The Code-3 list changes quarterly. Call the USPFO CL VIII Manager or refer to the Materials Management Branch intranet site for a current list of Code-3 items.

Step 2. Approximately 60 days before the 180-day accumulation time limit expires, initiate the DW turn-in and disposal process by submitting a MIL FORM 3161a, pictured below, to your supporting maintenance facility. (See Chapter 5 of this plan for more detailed guidance regarding DW turn-in).

DRMO Waste Turn-In Request													
Unit/Activity:		Facility:			POC:			Phone#:					
										USPFO & CFMO-ENV use only			
Item #	Nomenclature	Waste Profile # or MSDS	Hazard Class	Solid, Liquid, Gas?	UN Container Type	Container Size	# of Containers	Weight in Pounds	EPA/State Waste Code	CLUB	Total Cost Per Item	DTID #	Reimb Y/N
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
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18													
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20													

MIL FORM 3161a

Step 3. Your supporting maintenance facility will forward the DW Turn-in Request to the USPFO Warehouse. The USPFO will complete the required paperwork and send it to DLA DS.

Step 4. The USPFO will contact the requesting unit/activity with a pickup date. DLA DS will most likely pick up pharmaceutical waste at the same time as other DWs.

WAARNG units and medical personnel will not self-transport non- creditworthy pharmaceuticals (DW) to Camp Murray for turn-in. Units will maintain physical custody of all DW until DLA DS arrives on-site to remove it.

Figure D-1. Management of Waste Pharmaceuticals Flow Chart

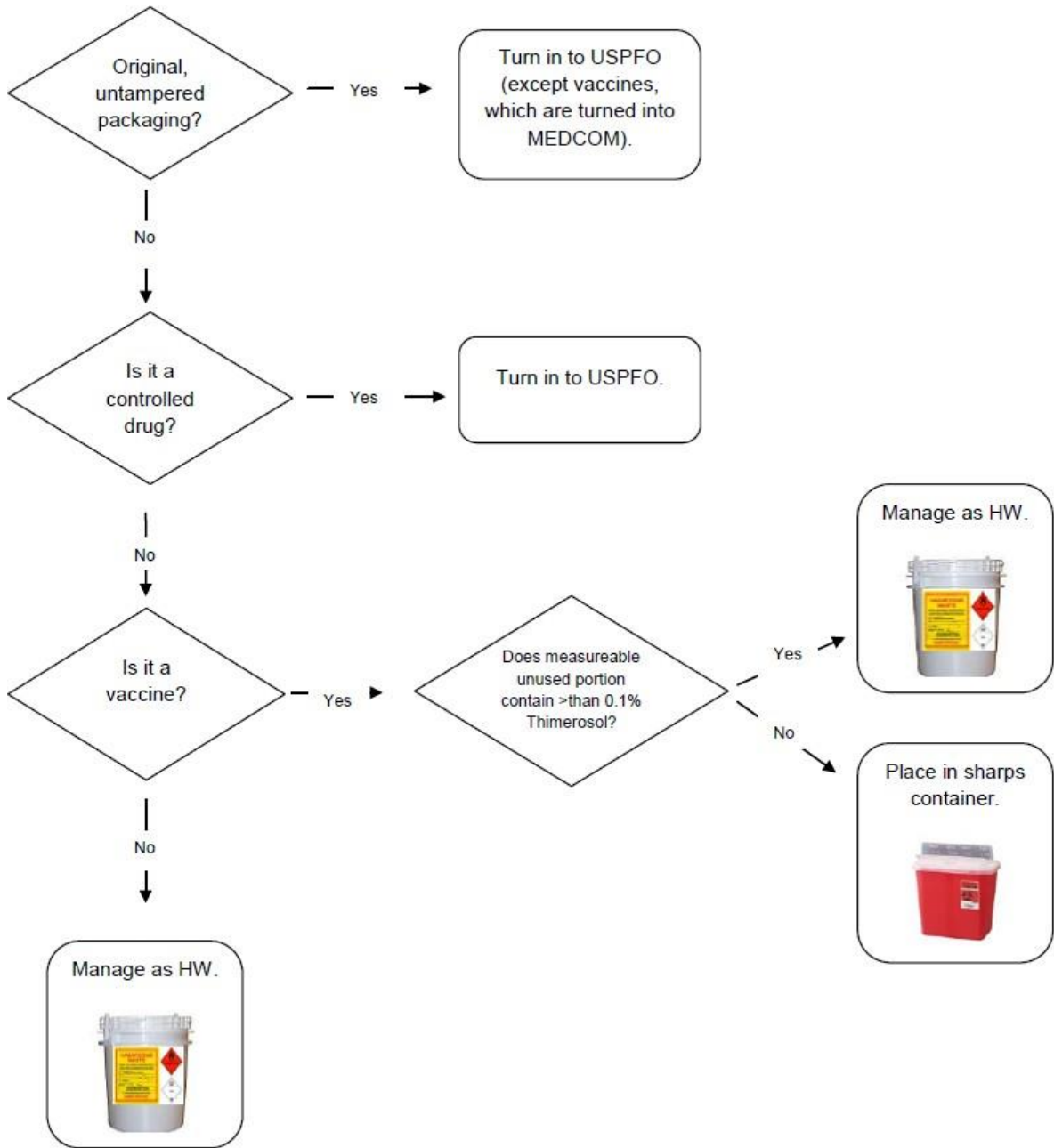


Table D-1. Accumulation Requirements for Pharmaceutical Waste

Accumulation Amount	No limit
Accumulation Time Limit	180 days
Appropriate Container	UN-approved containers
Container Labeling	<p>Containers must be marked or labeled with the following information:</p> <ul style="list-style-type: none"> • “Non-Viable Hazardous Pharmaceutical Waste” • Major risk label(s) • Accumulation Start Date (ASD)-begins when waste is first added to the container
Accumulation Area Inspections	No requirements but highly recommended
Personnel Training	Appropriate training for handling DW (i.e., ECO training)

The DW accumulation area at your site should have three containers designated for pharmaceutical waste collection, one for each of the following waste streams: 1) Albuterol inhalers; 2) Silver nitrate swabs; and 3) All other pharmaceutical wastes. Refer to Table D-2 or the Waste Profile Sheets in Appendix A for specific labeling requirements.

Table D-2. Labeling Requirements for Pharmaceutical Waste Containers

<p>Most pharmaceuticals:</p>		
<p>Albuterol inhalers:</p>		
<p>Silver nitrate swabs:</p>		

Appendix E - Dangerous Waste Minimization

DW minimization efforts are critical to the success of any waste management program and are encouraged at every level. Units and activities should make every possible effort to reduce, reuse and recycle DW streams whenever possible. Examples of reducing waste include minimizing hazardous chemical stocks and finding less hazardous substitutions. Examples of reuse/recycling include the on-site distillation of solvents. Where chemical substitution opportunities are limited or unavailable, such as the case with antifreeze and engine oils, recycling is the preferred option. Ultimately, DW reduction will be realized when waste minimization principles are incorporated into the overall management strategy of an organization.

Regulatory Drivers

Federal, state, Department of Defense (DOD) and ARs mandate DW minimization efforts. Waste minimization requirements are found in several regulations, including but not limited to the Resource Conservation and Recovery Act (RCRA); the Pollution Prevention Act of 1990; and Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (2007).

In response to these requirements, the WMD has developed a proactive waste minimization and pollution prevention (P2) policy that calls for the reduction of hazardous material use and releases of pollutants into the environment (to the extent feasible). It is also the agency's goal to reduce the status of all WMD facilities to an exempt, non-regulated status. This status, known as Small Quantity Generator (SQG) by [WAC 173-303](#), allows for the greatest flexibility and the least intrusive reporting and management requirements for WMD DW generators.

Waste Minimization Projects

Beginning in 1991, a Pollution Prevention Opportunity Assessment (PPOA) was employed to help identify pollution prevention (P2) opportunities and bring the WMD into compliance with state and federal waste reduction goals. Listed below are examples of P2 opportunities that were identified within the WMD and the benefits derived from each.

Solvent Substitution

Issue: Waste solvent accounted for 60-70% of all wastes generated

Action: Replaced the solvent then in use with a nonhazardous type (PD 680 Type II) and purchased 45 new solvent tanks and filter units

Result: Reduced waste by 68,000 lbs./yr., which resulted in a cost savings of \$35,000 per year. Eliminated regulatory requirements associated with the waste stream

High Pressure, Hot Water/Detergent, Enclosed Parts Cleaning Systems

Issue: Newly purchased solvent/filter systems were unable to adequately handle heavy greases. Constant system failures experienced by maintenance personnel when cleaning wheel bearings, etc.

Action: Purchased hot water cleaning systems to augment solvent systems. New system used high pressure hot water and detergent in an enclosed cabinet to clean parts

Result: Maintenance community regained the ability to clean heavily soiled and greasy parts without substantially increasing the production of DWs

Lead Acid Battery Service Contract

Issue: WAARNG maintenance activities were required to separate non-serviceable lead acid batteries into their component parts by draining the acid out of the batteries. The batteries and acid were then turned in to DLA DS; the acid then becoming a DW. The production of spent sulfuric acid represented the second largest DW stream in the WMD

Action: Obtained Interstate Battery contract service

Result: Activities no longer had to separate the acid from dead and non-serviceable batteries. The spent acid waste was eliminated. WAARNG employees no longer exposed to risks associated with the draining of batteries. Battery acid disposal costs eliminated. The cost of the contracted service was offset by the man-hour savings created by not having to drain batteries

Aerosol Can Puncturing Systems

Issue: Aerosol cans, unless drained and punctured, are a DW. All WAARNG activities have excess to aerosol paints, coatings, etc. Disposal costs for each 55-gallon drum of spent cans averaged \$200, even though 90% of the volume of the drum was empty

Action: Purchased aerosol can puncture and recovery systems

Result: More cost-efficient disposal of waste products. Drained paint is recovered in a drum for disposal. Empty cans can be crushed and disposed as solid waste

Antifreeze Recycling Service

Issue: Antifreeze became a regulated waste in 1993. Activities producing waste antifreeze are required to properly dispose of, or recycle this waste

Action: The WMD EPO located an antifreeze recycling service

Result: The spent antifreeze is recycled, and therefore, it does not count towards DW generator status

Shop Towel Laundering

Issue: Contaminated rags may be considered DW if thrown away in the trash

Action: Procured a shop towel laundering contract

Result: The potential waste stream is eliminated

The above efforts are extremely important. Annual P2 progress reports, including a description of the progress made toward achieving waste minimization goals must be prepared and submitted to the WDOE annually. Every five years, the plan shall be updated, and a new executive summary submitted to WDOE.

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Appendix F - Frequently Asked Questions

The following questions are alphabetically categorized into specific areas of interest. For example, FAQs regarding SOLVENT will be found before USED OIL.

Absorbents

Q: How do I distinguish whether absorbents are hazardous or non-hazardous?

A: *Absorbents and spill residues that are contaminated with commercial chemical products with constituents listed in [WAC-173-303-9903](#) and [9904](#) (known as the U, P, K and F wastes) are considered hazardous. Exotic chemicals usually produce these kinds of wastes, for example, methylene chloride, methyl ethyl ketone, carbon tetrachloride etc.*

Q: What can I put into the used absorbent drum for Basin Oil?

A: Absorbent pads, cloth and paper rags, and spill booms. See WPS for Absorbents in Appendix A.

Batteries

Q: Are all batteries Universal Waste (UW)?

A: *No. Lead-acid batteries are not UW when a lead-acid battery recycler reclaims them. However, they may be managed as UW if not reclaimed. All other batteries are being managed as UW in the WAARNG.*

Q: Can I discharge lithium batteries with a Chemical Discharge Device (CDD)?

A: *No. Some lithium batteries may vent sulfur-dioxide gas, which is extremely poisonous if inhaled.*

Q: Do I have to separate batteries by type?

A: *Yes. They must be separated by type, such as lithium, magnesium, nickel- cadmium etc. These types of batteries have different proper shipping names, which require them to be packaged separately. Spent batteries also are managed under different Contract Line Item Numbers (CLINs) through our disposal agency, DLA DS.*

Containers

Q: Can I reuse a container to accumulate waste?

A: *Yes, if you use the container to accumulate the same type of chemical's/product's wastes ensuring that the wastes are compatible, and containers are DOT rated.*

Drill Weekend

Q: How do I turn in waste on drill weekend?

A: *Contact your ECO. Each unit is required to have a Primary and Secondary Environmental*

Officer trained IAW the WMD Environmental Training Plan standards and appointed on orders. Contact the EPO at Camp Murray if your unit does not have an ECO.

Fuels

Q: Can I mix diesel fuel and JP8/JP4 with used oil?

A: *Yes. These fuels are considered fuels/upper engine lubricants and therefore they meet the definition of used oil contained in the June 2000 amended [WAC 173-303-515](#).*

Q: Can I mix gasoline (MOGAS) and used oil?

A: *No. Waste disposal vendors require gasoline and diesel fuel to be accumulated separately. They need to know exact quantities of each to get the right blending ratio.*

Q: Are spent fuels HW?

A: *It depends. **No**, if someone **uses** them as a fuel. **Yes**, if they are sent to a TSDF to be **treated** via incineration, combustion or other method. Fuels generated in the WAARNG are typically turned in as spent fuel and not HW.*

Shelf-Life

Q: Can I use or extend **expired** shelf-life items?

A: *No. The word **expired** implies that the item is a Type I shelf-life item. There are two types of shelf-life items, Type I and II. Type I items are only usable for specific periods of time (shelf-life), and their containers usually display the words “expires, expiration date, etc.” Type II items, however, are extendible and usually display the words “inspect or re-inspect” with a date. **State Maintenance and Unit activities may use expired shelf-life military products when authorized by the Hazardous Materials Manager (HMM) at Camp Murray.***

Q: How do I extend shelf-life items?

A: *Only Type II shelf-life items may be extended, with a few exceptions. Some Type I NBC and medical products can be extended. Shelf-life can be extended by either using analytical laboratory data for a specific product supplied on the Quality Status List (QSL), or through visual inspection using a products shelf-life code. The code can be obtained from the container, FEDLOG, or the Military Quality Control Storage Standard (MQCSS) found on the Internet at www.shelflife.dla.mil.*

State Maintenance Activities

Q: What is the relationship between state maintenance and the National Guard units they support?

A: *State maintenance activities generating DW must ensure their operations comply with site procedures. A single EPA identification number is assigned to each contiguous site generating DW. This number is issued to the operator or owner of the site, not to individual activities within the site. Since both the National Guard and state maintenance are under the control and direction of the Washington State Military Department, the EPA considers all*

activities at Guard locations to be single, joint, operations. An inspector reviewing DW operations will not recognize or respect any difference between state and military operations.

State Maintenance Responsibilities

Q: What is state maintenance's scope of responsibility for the management of DWs at National Guard sites?

A: *State maintenance supervisors and employees are responsible to identify, package, and appropriately store on-site those wastes generated as a result of their operations. Federally generated and State generated wastes will be disposed of IAW the provisions of this plan. **In all cases**, supervisors will ensure the wastes are properly identified, packaged, and appropriately stored, and that all employees are trained in the specifics for compliance and hazards.*

Q: Can DW be self-transported off-site?

A: *No. DW, whether generated by State Maintenance activities or National Guard Unit activities, must stay on the site where it was generated. If generated on a Federal Installation, DW will be turned in through coordination with the installation's Environmental Office. DW generated at armories will be consolidated (State Maintenance AND Unit wastes collected together) and a pick-up by DLA DS will be arranged through the WMD EPO.*

Unknown Waste

Q: Am I responsible for unknown wastes that I discover?

A: *Yes. At a minimum, you are responsible for ensuring that appropriate personnel are notified regarding the waste's status. Follow the guidelines in the WPS for managing unknown wastes.*

Used Oil

Q: How much **used oil** may I transport without obtaining an EPA Transporter Identification number?

A: *Fifty-five gallons.*

Weapons cleaning patches and debris

Q: Are weapons cleaning patches, rags, pipe cleaners and associated products from the cleaning of weapons DWs?

A: *Yes. Additionally, all debris from weapons cleaning can be collected together in a single drum.*

Appendix G - Generator Status

The EPA Identification (ID) number is EPA and WDOE’s tool for identifying and monitoring DW generators and their waste. Identification numbers are required for medium and LQGs. Refer to Chapter 3 of this plan for a description of each generator type.

The table below identifies the generator status of WMD facilities¹. As shown, generator status can vary from year to year based on the amount of waste generated or accumulated. The WMD EPO (253-512-8464) will notify appropriate personnel in the event of significant changes to a facility’s generator status.

Table G-1. WMD waste generator status and respective EPA ID numbers

Generator Name	Location	EPA ID Number	Status 2017	Status 2018	Status 2019
Camp Murray	CM5	WAD980725626	LQG SQHUW	LQG LQHUW	SQG LQHUW
MATES	Yakima	WA4214005395	SQG SQHUW	LQG SQHUW	LQG SQHUW
FMS #1	Seattle	WA1211890040	NQG NQHUU	LQG NQHUU	NQG NQHUU
FMS #2	Ephrata	WAD981772130	NQG SQHUW	XQG SQHUW	LQG SQHUW
FMS #3	Sedro Woolley	WAH000003814	NQG NQHUU	NQG NQHUU	SQG NQHUU
FMS #4	Montesano	TBD	XQG SQHUW	XQG SQHUW	XQG SQHUW
Armory	Grandview	WAH000039451	NQG NQHUU	NQG NQHUU	NQG NQHUU
Armory	Kent	WA0211890041	NQG NQHUU	NQG NQHUU	NQG NQHUU
Armory	Bremerton	WAH000039451	NQG NQHUU	NQG NQHUU	NQG NQHUU
Armories	Statewide	Exempt ²	SQG SQHUW	SQG SQHUW	SQG SQHUW
<p>Notes:</p> <p>(1) Waste generator status for select facilities (i.e., CSMS, UTES, and AASF#1 located on Fort Lewis, and FMS#5, located on Fairchild Airforce Base) is managed under the EPA ID number of the respective federal facilities.</p> <p>(2) Exempt as long as fewer than 220 lbs. DW (or 2.2 lbs. Extremely Hazardous Waste or Acute Hazardous Waste) is generated per calendar year</p>					

Appendix H – Universal Waste Guidance

1. Purpose

a. This document is to provide Standard Operating Procedures (SOPs) for the accumulation and storage of Universal Waste (UW) at Washington Army National Guard facilities located in the State of Washington. The guidance this document provides aims to maintain compliance under 40 CFR 273 and WAC 173-303-573 for generators and handlers of UW.

b. This document is a supplementary appendix to the DW Management Plan, Army Pamphlet 200-1 (DWMP) and refers to Unified Washington Military Department and National Guard Policy 10-4.

2. Scope

a. This SOP applies to all WMD state and federal civilian employees and members of the Washington Army National Guard (WAANG). It also applies to any contractors, vendors, and/or visitors who support the WMD.

b. Personnel who access or are assigned to active-duty facilities, such as Joint Base Lewis-McChord (JBLM), Yakima Training Center (YTC), or Fairchild Air Force Base (FAFB), are reminded that they are responsible to comply with the requirements of their respective host installation, in addition to this policy and its procedures. If the policy of the host installation conflicts with this document, the policy of the host installation will take precedence.

3. Training

a. All generators and handlers of UW shall be trained on the proper procedures for handling, accumulating, and storing UW. Training shall be refreshed annually.

b. Training must include instructions for proper safe handling of the materials in use during normal operations and emergency situations.

4. Generators

a. There are two categories of UW generators, these are Large Quantity Handlers (LQH) and Small Quantity Handlers (SQH):

- 1) LQH- Accumulates more than 5000 kg (>10,000 lbs.) per calendar year
- 2) SQH- Accumulates less than 5000 kg (<10,000 lbs.) per calendar year

5. Universal Wastes

a. There are three categories of UW:

1) Batteries, except for spent lead-acid (SLA) batteries. *For the purpose of accumulation, storage, and shipping SLA batteries shall be treated as UW. For final disposition, SLA batteries will be managed under 40 CFR 266 subpart G, WAC 173-303-120 (3)(f), and WAC 173-303-520 to be recycled rather than disposed. **An important distinction to reduce the amount of HW generated by WMD facilities as recycled materials are not considered waste.***

2) Lamps, except for incandescent and halogen. Incandescent and halogen lamps do not contain HM and may be disposed of as non-hazardous municipal solid waste.

3) Mercury containing equipment, such as thermometers, thermostats, barometers, and mercury switches.

6. Accumulation

a. An area within the facility shall be designated as the accumulation point for UW and shall be delineated with signage posted to inform personnel of the type of UW at the location and potential hazards presented by the UW. UW may not be stored outside of a designated accumulation point for any purpose other than the immediate removal and transportation to an approved disposal or turn-in facility. Satellite accumulation points may be designated, but each location must conform to the requirements for safe storage and signage as outlined in Chapter 4 of the DW Management Plan, Army Pamphlet 200-1 to receive approval.

b. batteries:

1) All batteries must have the terminals individually taped or otherwise covered when placed into the accumulation area. *Previous exemption for alkaline batteries has been eliminated to streamline policy and prevent errors where non-alkaline battery terminals mistakenly are not covered.*

2) batteries must be segregated by type: lithium-ion, lithium-polymer, nickel-cadmium, nickel-metal halide, lead acid, mercury cells, and alkaline.

3) unused lithium-thermal batteries may not be disposed of as HW. These must be submitted to the USPFO or DLA for demilitarization prior to HW disposal.

4) **Batteries that do not have their terminals taped or covered, are not segregated by type, or lithium-thermal batteries will not be accepted for disposal.**

7. Storage

a. UW shall be stored in a manner that protects personal safety and prevents release of HM into the environment. UW shall be stored in a container that is compatible with the waste and capable of containing the waste should leakage or breakage of the inner contents occur. The container must be closed, structurally sound, free from leaks, spillage, or damage that could cause release of the contents in reasonably foreseeable conditions. The container must be labeled “Universal Waste” with the name of the waste, ASD, facility name and building number/location.

b. Batteries should be kept in a polyethene plastic container or plastic lined fiberboard box that is DOT approved and leak resistant when size allows. For large batteries, store on a pallet and write the date taken out of service on the battery. One UW label shall be placed on each side of the pallet, and the pallet must be shrink wrapped for shipping.

c. Lamps, when intact, should be returned to the original container with packing materials from the manufacturer that they were received in. If broken, place into a plastic lined wax coated fiberboard drum provided by the Hazardous Waste Program Manager (HWPM).

d. Mercury containing devices must be packaged in a manner that prevents breakage resulting in release during handling and transport. Sufficient packing materials should be added before placing in a sealable, leak resistant DOT shipping container.

e. UW in a **satellite** accumulation area may be stored until the container is full. When the container is full, the ASD must be written on the label and the container must be placed in the main accumulation area.

f. UW in an accumulation area must have the ASD written on the label upon first use and must be disposed of within one calendar year.

8. Signage and Labels

a. Appropriate signs for demarcation of accumulation areas and labels for containers may be obtained from the Camp Murray CFMO HazWaste Program, located in Building 36.

b. For sites located away from Camp Murray, contact the HWPM at 253-512-8464 and materials can be shipped to your location.

9. Spills and Releases

a. Any spill or release of UW material or residue of UW must be immediately contained. The handler must treat the material released as HW, and manage it IAW 40 CFR parts 260 through 272. In addition, you must notify the EPO Spill Coordinator at 253-355-4364, or if there is no answer contact the JOC at 253-512-8773 or 888-276-4362. Keep a log of record that includes the time, date, and location of the spill, volume and substance spilled, cleanup and corrective actions taken, and times that the EPO Spill Coordinator or JOC was contacted.

b. Refer to the Unified Washington Military Department and National Guard Policy Number 10-04 for further guidance.

Glossary and Acronyms

Glossary

The following definitions are specific to this PAM. In some cases, these definitions may vary from those found in the regulations as they are summarized or are a composite of definitions from different regulations.

Accumulation - The process of collecting waste in containers on-site prior to shipping to a Treatment, Storage, and Disposal Facility (TSDF). Waste can be accumulated at Satellite Accumulation Points and DW Accumulation Areas.

Activity - A unit or organization that performs a function or mission, or a group or facility on an installation assigned space for a common usage or function and held operationally accountable by an authority other than the installation commander.

Acute Hazardous Waste – Means DW sources (listed in WAC 173- 303-9904) F020, F021, F023, F026, or F027 and discarded commercial chemical products (listed in WAC 173-303-9903) that are identified with a DW number beginning with a “P”, including those wastes mixed with source, special nuclear, or by-product material subject to the Atomic Energy Act of 1954.

Accumulation Start Date (ASD) - The date when a HW first becomes subject to the accumulation time limits. This is the date the waste is first placed into a container within a DWAA, or the date the 55-gallon quantity limitation is exceeded at a Satellite Accumulation Point.

Dangerous Wastes – Means those solid wastes designated in WAC 173-303-070 through 173-303-100 as dangerous, or extremely hazardous or mixed waste. As used in this PAM, the words “dangerous waste” refer to the full universe of wastes regulated by this PAM.

Dangerous Waste Accumulation Area (DWAA) - A central management location where waste is temporarily stored before being shipped off site.

Extremely Hazardous Waste (EHW) – Means those dangerous and mixed wastes designated in WAC 173-303-100 as extremely hazardous.

Hazardous Chemical - Any element, hazardous chemical compound, or mixture of elements and compounds that is a physical hazard or a health hazard. Hazardous chemicals are any items requiring an SDS, to include batteries, filters, and other solids, liquids, or gases. Chemicals with physical hazards include combustible liquids, compressed gases, explosives, flammables, organic peroxides, oxidizers, and pyrophoric chemicals that will ignite spontaneously in air, unstable chemicals, and water-reactive chemicals. Chemicals with health hazards are those for which there is significant evidence that the chemical has an acute or chronic effect on the health of

exposed people. See 29 CFR 1910.1200, Appendix A and Appendix B for further definitions, explanations, and criteria for identifying hazardous chemicals.

Hazardous Material – All HM are considered hazardous chemicals, but not all hazardous chemicals are HM. Defined by the U.S. DOT, it is anything that due to its chemical, physical or biological nature causes safety, public health or environmental concerns. HM include HW and materials exhibiting explosive, flammable, corrosive, and oxidizing properties.

Hazardous Materials Information System (HMIS) – A multiple compact disc set sponsored by the Defense Supply Center Richmond Program. The HMIS contains SDS for chemicals procured through military supply channels.

Hazardous Waste - A solid waste is a HW if it meets either of the following criteria and it is not specifically excluded from regulation as a HW:

- It is ignitable, corrosive, reactive or toxic as measured by standard test methods or as can be reasonably determined by generators through knowledge of the waste generating process.
- It is a specifically listed as such in WAC 173-303-9903 and 9904.

HAZMAT Employee - Personnel in the WAARNG who load, unload, or handle HM or prepare them for shipment and/or persons responsible for HM transportation safety or who operate a vehicle used to transport HM.

Large Quantity Generator (LQG) - An activity that generates 2,200 pounds or more of HW in a calendar month or accumulates more than 13,200 pounds of HW at any one time. A LQG may accumulate HW for no more than 90 days after the ASD.

Manifest - A shipping document that must accompany HW to the Treatment, Storage, and Disposal Facility (TSDF).

Safety Data Sheet (SDS) - A collection of information required by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard. A SDS includes the identity of hazardous chemicals, health and physical hazards, exposure limits and safety precautions.

Medium Quantity Generator (MQG) - A activity that generates more than 220 pounds but less than 2,200 pounds of HW per month and does not accumulate more than 13,200 pounds of HW at any one time. An MQG may accumulate HW for no more than 180 days from the ASD. MQGs located more than 200 miles from a HW Treatment, Storage, and Disposal Facility (TSDF) may accumulate HW for no more than 270 days from the ASD.

Personal Protective Equipment (PPE) - Any protective clothing or device worn by the employee to prevent contact with, and exposure to, HM in the work area. Examples include protective aprons, goggles, face splash shields, eye protection and various types of respiratory protection.

Satellite Accumulation Point (SAP) - A designated point where a generator may accumulate up to 55 gallons of HW or one quart of acutely hazardous waste. Each SAP must be at or near the point of generation and must be under the control of the operator of the process generating the waste.

Small Quantity Generator (SQG) - Activities that

- Produce no more than 100 kg/mo [220 lb./mo] of HW
- Accumulate no more than 1000 kg [2200 lb.] of HW onsite
- Generate less than 100 kg [220 lb.] of any residue or contaminated soil, waste or other debris resulting from the cleanup of any acute waste release

Solid Waste - All discarded materials including solids, semi-solids, sludges, liquids and compressed gases unless excluded by regulation. A discarded material is any material that is abandoned, recycled, or considered inherently waste-like (40 CFR 261.2).

Special Waste - Any state-only DW that is solid only (nonliquid, nonaqueous, nongaseous), that is: Corrosive waste (WAC 173-303-090 (6)(b)(ii)), toxic waste that has Category D toxicity (WAC 173-303-100(5)), PCB waste (WAC 173-303-9904) under State Sources), or persistent waste that is not EHQ (WAC 173-303-100(6)). Any solid waste that is regulated by the USEPA as HW cannot be a special waste.

Spill - The accidental leaking, pumping, emitting, discharging, emptying or dumping of waste or materials.

State-Only Dangerous Waste - A waste designated only by WAC 173-303 and is not regulated as a HW under 40 CFR Part 261.

Transfer - The physical movement of waste from one activity or point to another, such as from a SAP to a DWAA or off-site to a Treatment, Storage and Disposal Facility.

Universal Waste - Defined in WAC 173-303-573, universal wastes include batteries and mercury thermostats.

Used Oil - Any oil that has been refined from crude oil, or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities. This includes, but is not limited to fuel oils, motor oils, gear oils, cutting oils, transmission fluids and hydraulic fluids. For the purposes of this PAM, used oil does not include transformer oil or other dielectric fluids.

Acronyms

AASF	Army Aviation Support Facility
ACM	Asbestos Containing Material
AR	Army Regulation
ARNG-ILE	Army National Guard Environmental Programs
ASD	Accumulation Start Date
AT	Annual Training
CFR	Code of Federal Regulations
CFMO	Construction, Facilities and Maintenance Office
CSMS	Combined Support Maintenance Shop
DA	Department of the Army
DEA	Drug Enforcement Agency
DOD	Department of Defense
DOL	Directorate of Logistics
DOT	Department of Transportation
DLA DS	Defense Logistics Agency Disposition Services
DW	Dangerous Waste
DWAA	Dangerous Waste Accumulation Area
DWMP	Dangerous Waste Management Plan
ECO	Environmental Compliance Officer
EPA	Environmental Protection Agency
EPAS	Environmental Performance Assessment System
EPO	Environmental Programs Office
FAFB	Fairchild Air Force Base
FM	Field Manual
FMS	Facility Maintenance Shop
HAZMAT	Hazardous Materials
HAZWOPER	Hazardous Waste Operations and Emergency
HWPM	Hazardous Waste Program Manager
HM	Hazardous Materials
HW	Hazardous Waste
IAW	In accordance with
IC	Incident Commander
ICP	Installation Contingency Plan
IDT	Inactive Duty Training
JBLM	Joint Base Lewis McChord
JOC	Joint Operations Center
LDR	Land Disposal Restriction
LQG	Large Quantity Generator
MATES	Mobilization and Training Equipment Site
MQG	Medium Quantity Generator

SDS	Safety Data Sheet
NCO	Non-Commissioned Officer
NFPA	National Fire Protection Association
NSN	National Stock Number
OSC	On-Scene Coordinator
OSHA	Occupational Safety and Health Administration
P2	Pollution Prevention
PAM	Pamphlet
POL	Petroleum, Oil and Lubricant
PPE	Personal Protective Equipment
PPOA	Pollution Prevention Opportunity Assessment
PSG	Platoon Sergeant
RCRA	Resource Conservation and Recovery Act
SAP	Satellite Accumulation Point
SITREP	Situation Report
SOP	Standing Operating Procedure
SPCC	Spill Prevention, Control and Countermeasures
SQG	Small Quantity Generator
TAG	The Adjutant General
TSDf	Treatment, Storage and Disposal Facility
USPFO	United States Property and Fiscal Office
UTES	Unit Training Equipment Site
UW	Universal Waste
WAANG	Washington Air National Guard
WAARNG	Washington Army National Guard
WDOE	Washington Department of Ecology
WMD	Washington Military Department
WPS	Waste Profile Sheet
XQG	No regulated waste generated
YTC	Yakima Training Center

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