



Washington State
Military Department

Dangerous Waste Management Plan

**Joint Force Headquarters
Washington Military Department
Camp Murray
15 May 2012**

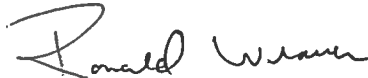
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JOINT FORCE HEADQUARTERS
WASHINGTON MILITARY DEPARTMENT
Camp Murray
Tacoma, Washington 98430-5000
15 May 2012

DANGEROUS WASTE MANAGEMENT PLAN

By Order of the Adjutant General:

Official:



Ronald L. Weaver
GS-15 Washington Army National Guard
Joint Chief of Staff

History. This printing is the second publication of this document.

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 July 23, 2002. If conflict exists between procedures outlined in this plan and those of applicable federal, state or local law or regulation, the latter will take precedence for compliance.

Applicability. This Dangerous Waste Management Plan applies to all state and federal civilian employees of the WMD and all members of the Washington National Guard.

Proponent and exception authority. The proponent for this publication is the WMD Environmental Office.

Suggested improvements. Users are invited to send comments and suggested improvements to Military Department - State of Washington, ATTN: Environmental Office, Camp Murray, WA 98430-5080.

Distribution: A

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Summary of Changes Since May 15, 2012

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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GLOSSARY AND ACRONYMS

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Chapter 1

INTRODUCTION

Purpose and Scope

This plan documents the Washington Military Department (WMD) dangerous waste management program by prescribing policies and procedures for the proper accumulation and handling of dangerous wastes. 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 federal, state, and local laws and regulations.

The contents of this document are consistent with the agency's Environmental Policy (Unified Washington Military Department 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 dangerous waste generation.

Applicability

Guidance in this plan applies to all WMD activities that generate dangerous waste. This includes all organizations (military, civilian, contractor, tenant) operating on property owned or operated by the WMD.

The Washington Air National Guard (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, *Dangerous Waste 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 hazardous waste 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 Dangerous Waste 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 Office is the proponent for reviewing and modifying this document as requirements or regulations warrant. Please direct all questions or recommendations to the Environmental Office, Building 36, Camp Murray, Washington, 253-512-8717.

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 dangerous waste (DW) management rests with the individual activities that 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 Environmental Office will:

- Serve as the point of contact for federal, state and local agencies with regard to 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 dangerous waste 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

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- 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 Environmental Compliance Officer (ECO) and one Alternate ECO. The ECO will serve as the single point of contact in the unit/activity for environmental matters, including dangerous waste management
- Ensure the ECO, senior personnel and all other individuals who handle DW in the course of their work have received the proper training (Chapter 7)
- Ensure all POL, hazardous materials and dangerous wastes are inventoried, managed, handled and disposed of IAW federal, state, and local regulations
- Ensure all spills are reported immediately to the 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, dangerous waste manifests etc.)
- Notify the WMD Environmental Office (253-512-8717) 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 DRMO 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 Environmental Compliance Officer (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 dangerous waste 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 dangerous wastes and send them to the WMD Environmental Office 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, dangerous waste manifests etc.)
- Contact the support maintenance activity and/or USPFO Warehouse to schedule a DRMO 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

State Maintenance will:

- Ensure in-house projects involving the generation of DW comply with appropriate regulations and procedures in this plan

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- Appoint in writing one Primary Environmental Compliance Officer (ECO) and one Alternate ECO. The ECO will serve as the single point for environmental matters, including dangerous waste 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 dangerous wastes and send them to the WMD Environmental Office 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

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 Environmental Office as requested

G3 (Operations and Training) will:

- Ensure environmental considerations, such as dangerous waste management, are accounted for when approving training plans
- Coordinate with the WMD Environmental Office to ensure ECO training dates are incorporated into the yearly training calendar
- Coordinate with the WMD Environmental Office to ensure Environmental Awareness is included as an annual training 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 Environmental Compliance Officer (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 dangerous waste management
- Serve as the primary Point of Contact (POC) for interaction with the Defense Reutilization and Marketing Office (DRMO)
- Assist and coordinate budgeting and contract requirements for environmental programs and projects related to DW management
- Ensure proper accumulation of pharmaceutical dangerous wastes. Ensure 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 Environmental Office 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., OSHA

Medical Command (MEDCOM) will:

- Exercise proponency for the proper management of Regulated Medical Waste (infectious wastes, sharps etc.)
- Coordinate with the WMD Environmental Office to ensure proper management of pharmaceutical dangerous waste
- Provide adequate training for personnel required to handle Regulated Medical Waste and pharmaceutical dangerous wastes
- Ensure all personnel who work with DW are appropriately trained
- Appoint in writing one Primary Environmental Compliance Officer (ECO) and one Alternate ECO. The ECO will serve as the single point of contact in the unit/activity for environmental matters, including dangerous waste management

Environmental Compliance Officers (ECOs) will:

A Primary and Alternate ECO will be appointed in each military unit from 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 dangerous waste management. ECOs will:

- Coordinate between unit/activity and the WMD Environmental Office
- 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 spills kits prior to training events
- Maintain the Environmental Recordkeeping Binder (Chapter 6)
- Incorporate environmental responsibilities related to DW management into unit/activity 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 Office, and to their supporting maintenance facility. A roster of trained ECOs is maintained by the Environmental Office.

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, Yakima Training Center, and Fairchild Air Force Base) 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 thru routine WAARNG incident reporting channels (with the notice "reported thru 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 Environmental Office on Camp Murray for situational awareness
- Report waste generation IAW the host installation’s requirements. Annual Dangerous Waste 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 Environmental Office for situational awareness

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Chapter 3

IDENTIFYING DANGEROUS WASTE AND GENERATOR STATUS

The WMD generates a variety of dangerous wastes 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 dangerous waste has different management standards that apply based on its ability to cause harm to human health or the environment.

Dangerous Waste Determination

In accordance with the Washington Dangerous Waste Regulations (WAC 173-303), generators of any solid waste must determine if their waste is a dangerous waste 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. Everything you throw away must be properly characterized to determine if it is a dangerous waste.

A dangerous waste 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, WDOE and local municipalities.

Categories of Dangerous Waste

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

There are also two smaller subsets of dangerous waste, "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 Dangerous Waste 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 – Dangerous wastes from non-specific sources (e.g., F001 - Spent halogenated solvents used in degreasing)
- ✓ K Listed Wastes – Dangerous wastes 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 is capable of generating 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 Dangerous Waste Regulations are more stringent than the federal hazardous waste 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.

You will usually hear Washington State Criteria Waste referred to as “State-Only Dangerous Waste.”

Universal Waste

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

- Batteries (except lead acid batteries)
- Mercury thermostats
- Mercury, sodium, high pressure vapor, halon or fluorescent light bulbs and lamps

Excluded Categories of Waste

The Dangerous Waste Regulations exclude certain types of wastes from the majority of the dangerous waste rules as long as certain conditions are met. The most common categories of excluded waste generated by WMD activities are:

- **Conditionally Excluded Wastes** — These 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)
- **Special Wastes**— 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 dangerous waste. For detailed guidance regarding pharmaceutical dangerous waste, refer to Appendix D of this plan.

WMD Operations That May Generate Dangerous Waste

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

Table 3-1. Process Operations That Typically Generate Dangerous Waste

Process Operation	Hazardous Products Used	Hazardous Ingredients Listed on Label	General Dangerous Wastes 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 Biphenols (PCB), fluorescent, mercury vapor, metal halide, high-pressure sodium, neon	Bulbs, mercury switches and thermostats are toxic universal wastes, PCB containing light ballasts are state designated dangerous wastes

Generator and Handler Status

Generators of dangerous and universal waste are classified into five categories by the Washington Department of Ecology (WDOE). The categories are small, medium and large quantity generators for dangerous waste 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 generate some dangerous wastes. These facilities, however, should never generate more than 220 pounds of a dangerous waste or 2.2 pounds of acutely hazardous waste (AHW) or extremely hazardous waste (EHW) in any one month. SQGs do not have dangerous waste accumulation time limits and do not require an EPA Identification (ID) number. They may not accumulate more than 2,200 pounds of dangerous waste 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 dangerous waste 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 dangerous wastes to a TSDF within 180 days of the Accumulation Start Date (ASD).

Large Quantity Generators (LQG)

LQG facilities generate over 2,200 pounds of dangerous waste 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 dangerous wastes 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, is to track 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 (LQHUW)

Large Quantity Handlers of Universal Waste (LQHUW) 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. LQHUWs are required to obtain an EPA ID number and transfer wastes to a recycling facility or TSD facility within 365 days of the ASD.

Table 3-2. WDOE Dangerous Waste Generator Status Classifications

Generator Status	Dangerous Waste Generation per Calendar Month/Year
SQG	No more than 220 lbs. of dangerous waste (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 dangerous waste (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 dangerous waste (approximately 5 drums), or 2.2 lbs. of AHW or EHW per month
LQHUW	More than 11,000 pounds of universal waste per calendar year
SQHUW	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 dangerous waste generators and their waste. Identification numbers are required for medium and large quantity generators. 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 dangerous waste accumulation areas: satellite accumulation points (SAPs) and general dangerous waste 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.

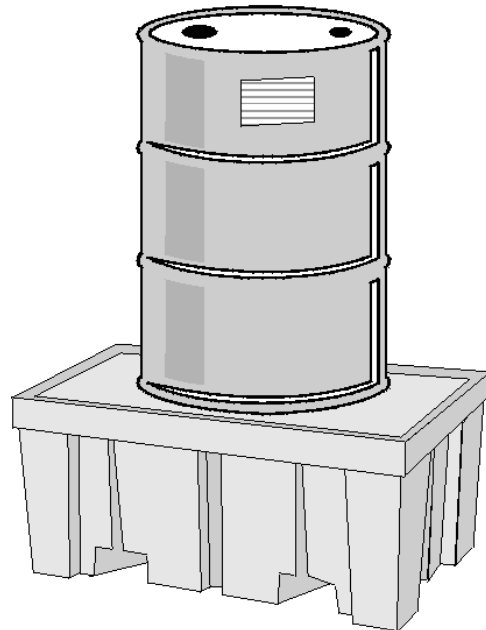
Satellite Accumulation Point (SAP)

A generator may accumulate as many as 55 gallons of dangerous waste (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 dangerous waste (or 2.2 lbs of acutely or extremely hazardous waste) is accumulated per waste stream, the container(s) must be marked immediately with the accumulation start date (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 Dangerous Waste 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 DRMO 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 Environmental Office, it is WMD policy to transfer all dangerous wastes (except universal wastes) to DRMO within 90 days of the accumulation start date. 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 Dangerous Waste 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 “cheat sheet” of the container management requirements discussed below.

Weekly Inspection

Every WMD facility that generates dangerous waste must conduct a weekly inspection of its Dangerous Waste Accumulation Area (DWAA). This is a federal and state regulatory requirement for medium or large quantity generators 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.

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 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 areas.

Marking and Labeling

Each container of dangerous waste 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 accumulation start date (ASD)

Unlike in a DWAA, do not mark a SAP container with the ASD 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 and maintained, as necessary, to assure its proper operation in time of emergency.

Do Your Drums Pass the Test?

A 10-point checklist for hazardous waste containers

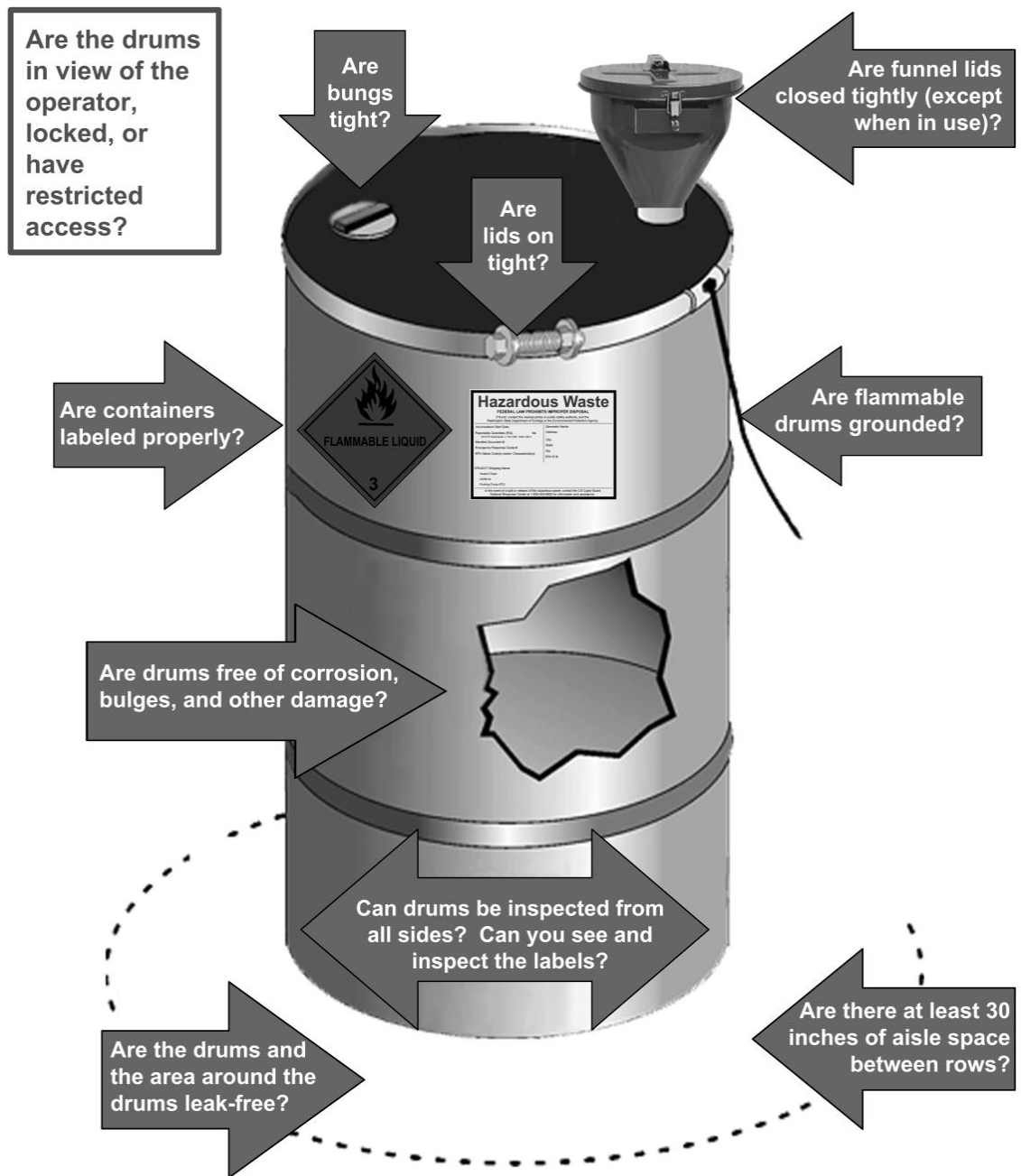


Figure 4-1. "Do Your Drums Pass the Test?" (source: WDOE Publication #08-04-015)

Forms for Waste Accumulation

This section includes the following forms:

- Satellite Accumulation Point Sign
- Dangerous Waste Accumulation Area Sign
- Dangerous Waste 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**



DANGER:

**Dangerous Waste
Accumulation Area**

**UNAUTHORIZED PERSONNEL
KEEP OUT**

**NO SMOKING OR OPEN FLAME
WITHIN 50 FEET**

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Chapter 5

TURNING IN DANGEROUS WASTE

The final step in “cradle to grave” management of dangerous wastes is the transfer of the waste to a RCRA permitted treatment, storage, and disposal facility (TSDF). The WDOE Dangerous Waste 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 involved in turning in dangerous waste in the WMD.

Turning in Dangerous Waste

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

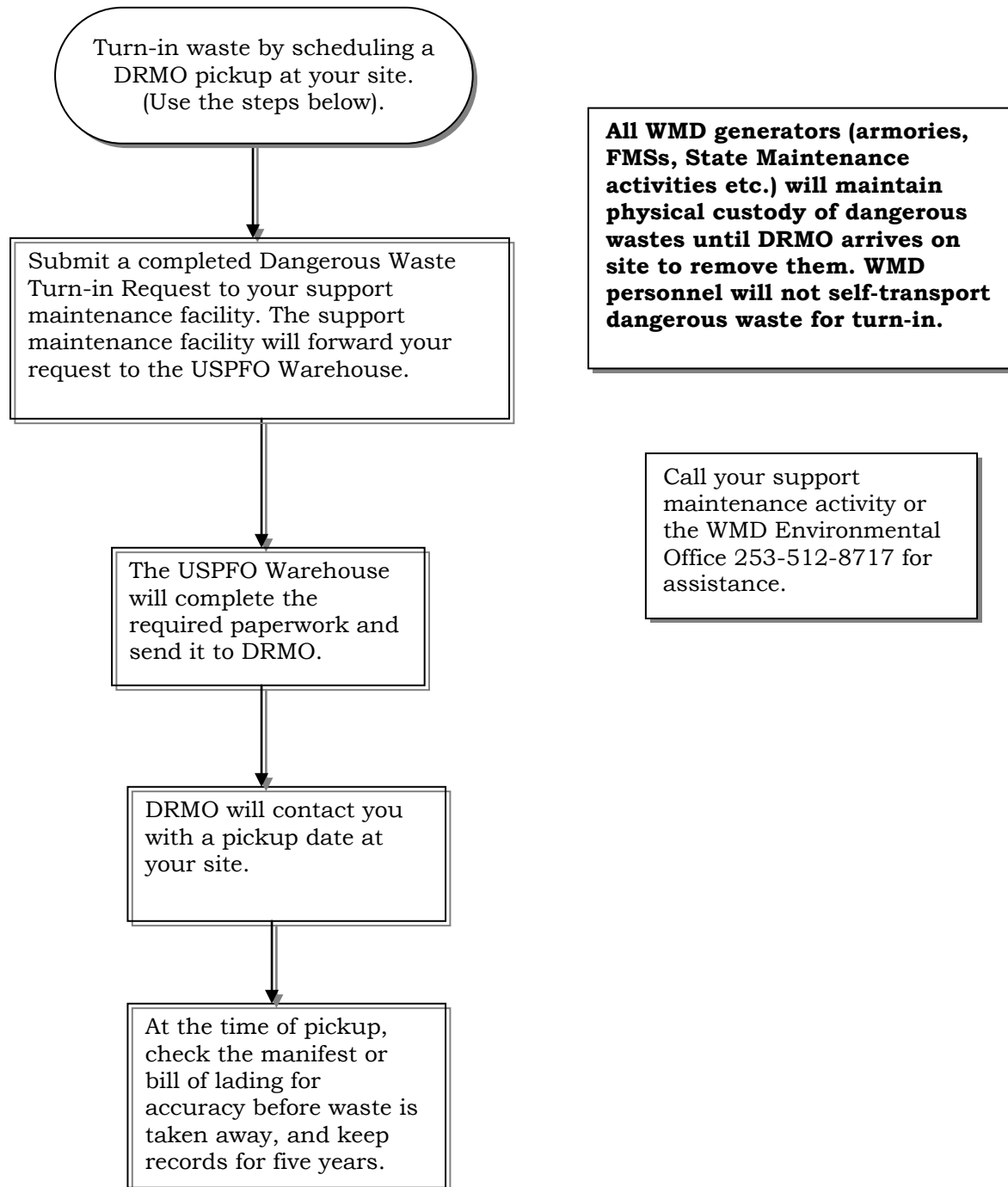
- Inspecting shipments prior to leaving to ensure use of proper containers, labels and manifests
- Placing the proper DOT shipping labels on the containers
- Segregating incompatible waste within the transporting vehicle
- Securing wastes in the vehicle
- Placarding the vehicle

ATTENTION!

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

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. Dangerous Waste Turn-in



Arranging a DRMO Pick-up

STEP 1. Submit a completed Dangerous Waste Turn-in Request (Figure 5-2) to your support maintenance facility. (A copy of this form is provided at the end of this section). The support maintenance facility will forward the request to the USPFO Warehouse. The USPFO Warehouse will complete the required paperwork and send it to DRMO.

To fill out the Dangerous Waste Turn-in Request:

- In column B, list all of the items you wish to turn in.
- In column C, list the waste profile number or put “MSDS” and attach an MSDS to your request. The waste profile number is next to block A.1 on DRMS Form 1930.
- Attach an MSDS for each item if there is no waste profile for that particular item.
- Column D asks for DOT hazard type, i.e., Class 1.x (explosives), Class 2.x flammable gas, Class 3 (combustible liquids), Class 4.x (combustible solid) etc.
- In column E, state S, L, or G for solid, liquid or gas.
- In column F, container type: DM for metal drum or DF for fiber or plastic drums, BF for box, etc.
- In column G, drum size in gallons.
- In column H, total number of containers of waste.
- In column I, total weight, including each waste container item.
- In column J, EPA waste codes, and state waste codes. These can be found on DRMS Form 1930, blocks 2a and 2b.

Figure 5-2. Dangerous Waste Turn-in Request

DRMO Waste Turn in Request											
Unit/Activity: your unit here				POC: your name here				Phone#: (your POC here) Email: (POC email)			
										G4-S & CFMO-ENV use only	
Item #	Nomenclature	Waste Profile # or MSDS	Waste Class	Solid LiquidGas?	Container Type	Container Size	# of Containers	Weight in Pounds	EPA/State Waste Code	CLIN	Total Cost Per Item
1	Lithium Batteries	10 001	9	S	DM	30	1	150	UW		
2	Nickel Batteries	10 003	9	S	DM	30	1	175	UW		
3	Non-RCRA Liquid-soap	10 027	n/a	L	DM	55	2	725	n/a		
4	Paint related material W-Asbestos	10 012	3	S	DM	55	4	1600	D001, D035, F005, WT02		
5	Paint Filters	10 019	4.1	S	DM	5	1	30	D007		

- STEP 2. Verify Waste Profiles. No DW pickup will be scheduled by DRMO without a current and accurate hazardous waste profile sheet (DRMS Form 1930).

It is recommended that you keep 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 Environmental Office.

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 Environmental Office has a budget for testing samples to analyze the contents of unknown wastes. If any shop needs to have a sample tested, send a request to the USPFO Warehouse, 253-512-7611 or 8428, or to the WMD Environmental Office 253-512-8717.

- STEP 3. DRMO will contact the requesting unit/activity with a pickup date.
STEP 4. At the time of pick-up, review disposal paperwork for accuracy. If correct, sign the manifest in the block designated for the generator.

WAARNG personnel authorized to sign disposal manifests must have 80 hr HAZMAT certification as outlined in DoD 4500.9-R, Ch.204, D.1.b. If there are no 80 hr HAZMAT personnel available, call the WMD Environmental Office at 253-512-8717.

- STEP 5. Keep the generator copy of the manifest and file it in accordance with Chapter 6 of this plan.
STEP 6. Annotate the transfer of dangerous waste on a copy of the Dangerous Waste Manifest Log, MIL FORM 519. A copy of this form is provided at the end of this section.
STEP 7. Within 30 days you should receive the signed original copy of the manifest. When this manifest is received, file it, and email a copy to the WMD Environmental Office (DW Program Manager).
STEP 8. If the original signed manifest is not received from DRMO within 30 days, contact the DW Program Manager immediately: 253-512-8717.

Turning in Dangerous Waste on Federal Installations

As a general rule, waste generated on a Federal Installation (Joint Base Lewis McChord, Yakima Training Center, and Fairchild Air Force Base) 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 Joint Base Lewis McChord, units must coordinate all waste-generating activities with Hazardous Waste Operations at Building 1210 (253-967-4786).
- At the Yakima Training Center, 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 Fairchild Air Force Base, units must coordinate all waste-generating activities with the Environmental Department (509-247-8163).

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 dangerous waste (i.e., to their supporting maintenance facility for subsequent turn-in to DRMO). WMD generators will maintain physical custody of all dangerous waste until DRMO arrives to remove them.

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

Forms for Turning in Dangerous Waste

The section includes the following forms:

- MIL FORM 3161a - Dangerous Waste Turn-in Request
- MIL FORM 519 - Dangerous Waste Manifest Log

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DRMO Waste Turn-In Request

Unit/Activity:	Facility:	POC:	Phone#:
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	USPFO & CFMO-ENV use only
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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	CLIN	Total Cost Per Item	DTID #	Reimb Y/N
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
16													
17													
18													
19													
20													

MIL FORM 3161a

DANGEROUS WASTE MANIFEST LOG
UNIT/ACTIVITY _____

YEAR _____

EPA ID# _____

DATE SHIPPED	MANIFEST NUMBER	2765-1 DOC#	DESCRIPTION OF WASTE	QUANTITY P or G	DESIGNATED FACILITY NAME	DATE ORIGINAL GENERATOR COPY RECEIVED (Manifest Back in 30 days)	COMMENTS

Chapter 6

INSPECTIONS AND RECORDKEEPING

Weekly Inspections

Every WMD facility that generates dangerous waste must conduct a weekly inspection of its Dangerous Waste Accumulation Area (DWAA). This is a federal and state regulatory requirement for medium or large quantity generators 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 Washington Department of Ecology (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 dangerous waste 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 Dangerous Waste Regulations (WAC-173-303) and AR 200-1 require all users of hazardous materials and generators of dangerous waste to maintain the following records, which are summarized below.

- Hazardous waste manifests
- Non-hazardous waste manifests
- Annual Dangerous Waste Reports
- Waste designation records
- DWAA Weekly Inspection Checklists

- Material Safety Data Sheets (MSDSs)
- Installation Contingency Plan/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plans
- Training records

Hazardous Waste Manifests

Hazardous waste manifests must be retained for a period of five years from the date the waste was accepted by the initial transporter (DRMO). 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 Dangerous Waste 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 Dangerous Waste 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 Environmental Office prepares and submits an Annual Dangerous Waste Report to the WDOE. The Environmental Office is responsible for maintaining Annual Dangerous Waste Reports (online storage is acceptable).

Waste Designation Records

The WMD Environmental Office maintains test results and waste designation records. A list of current waste profiles is available at Camp Murray. If you need a specific profile, contact the Environmental Office at (253) 512-8717.

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).

Material Safety Data Sheets

Copies of all Material Safety Data Sheets (MSDSs) must be kept in a visible location in accordance with the agency's Hazard Communication Program.

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

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

Each facility that stores hazardous materials is required to prepare a spill prevention and response plan. At WMD facilities, this plan is referred to as the Installation Contingency/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plan. This plan must be kept on file, along with records of the annual training 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 Joint Operations Center on Camp Murray was called.

Training Records

Generators must keep copies of all dangerous waste training and OSHA safety and DOT hazardous material training received by facility personnel. Records will include name and signature of employee, job title, dates of training, type of training, and person who conducted 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 Hazardous Waste Container Accumulation Area

For the Month
of _____, _____

Mark answers Yes or No below

Week 1	Week 2	Week 3	Week 4	Week 5
--------	--------	--------	--------	--------

	Date	Time	Inspector's Printed Name AND Signature
Week 1	/ /		
Week 2	/ /		
Week 3	/ /		
Week 4	/ /		
Week 5	/ /		

- Are all drums and containers marked or labeled as hazardous waste (or "waste pending analysis")?
- Are all drums and containers marked with the risk associated with the waste?
- Are all containers (excluding satellite containers) marked with the accumulation start date?
- Are any drums near or exceeding the LQG 90-day or MQG 180-day timeframe?
- Are all drum labels visible and readable?
- Are all containers closed?
- Are all drums and containers in good condition?
- Are any drums leaking?
- Is there 30 inches of aisle space between rows of containers?

Containment

- Is the secondary containment free of cracks or other failures?
- Are sumps clean and free of contamination, spills, leaks, and standing water?

Safety Equipment

- Are fire extinguishers charged?
- Are spill kits stocked?
- Is the first aid cabinet stocked?
- Is the emergency shower and eye wash station functioning properly?
- Are the emergency communication devices operating properly?
- Is emergency response information posted near all communication devices?

Comments: Describe the actions taken to correct each deficiency noted above, and note date each action was taken.

Chapter 7

TRAINING

Required Training

The following WDOE, DOT, OSHA, and ARNG regulations require that **all** persons working with hazardous materials and/or dangerous waste must be properly trained:

- Dangerous and Universal Waste Management (WDOE): 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 Dangerous Waste Regulations
- Hazardous Waste Operations and Emergency Response (HAZWOPER) (OSHA): 29 CFR 1910.120 (q)(6) requires the appropriate level of training for employees who are expected to participate in responding to HAZMAT incidents
- Hazard Communication (HAZCOM) (OSHA): 29 CFR 1910.120(h) requires facilities to train their employees about the hazardous chemicals to which they are exposed
- Hazardous Material (HAZMAT) Management (DOT): 49 CFR 172.704 requires that employees handling HAZMAT undergo general awareness/ familiarization training, function-specific training and safety training
- HAZMAT Transportation (DOT): 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 include dangerous waste, 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 dangerous waste are thoroughly familiar with proper waste handling and emergency equipment and systems, and emergency procedures.

WMD Dangerous Waste Management Plan

Training for LQGs must be provided by a person knowledgeable in dangerous waste 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)*

Medium quantity generators must provide adequate training to ensure personnel who handle dangerous waste are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities.

Initial training should 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 dangerous waste 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 annual training 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 Environmental Office at 253-512-8717.

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 Environmental Compliance Officer (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 296-800-17030
- Large Quantity Generator Training: WAC 173-303-330
- Small and Large Quantity Handlers of Universal Waste: WAC 173-303-573 (12) and (23), respectively

WMD Dangerous Waste Management Plan

- 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. Environmental Compliance Officer Training Needs (source: ARNG Environmental Training Strategy, 2006)

Training Need	Learning Objectives (skills, knowledge, ability)
Overview of environmental regulations as related to the organization	•Knowledge of major environmental laws and regulations related to organization's training, operations and logistics functions
Conduct Inspection	•Ability to perform a unit environmental self-assessment inspection
Documentation Management	•Ability to manage information concerning the unit's environmental training and certification requirements
Environmental Risk Assessment	•Ability to perform an environmental risk assessment
Dangerous Waste Management and Disposal	•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 and inspecting waste sites, and responding to waste emergencies
Spill Prevention	•Knowledge of preventative steps to minimize spills
Spill Response	•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.
XO AO Platoon Leaders	Both of 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 his/her maintenance activities and personnel are in compliance with regulations. This person 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 have an understanding of 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 have an understanding of hazardous chemical compatibility and storage, shelf life management, and HM and DW management.

WMD Dangerous Waste Management Plan

Job Function	Environmental Responsibility
Hazardous Materials Technician	Hazardous Materials 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 MSDSs, 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 MSDSs, as well as understand 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 MSDSs, as well as understand chemical compatibility, storage, and shelf-life and spill management. In addition they need to understand the requirements for transporting 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. In addition they need to understand the requirements for transporting HM/DW.
Laborer	Laborers may handle hazardous chemicals within the course of their duties. They must understand MSDSs, and have general environmental awareness training to ensure they manage, use, and dispose of these chemicals in a sound manner.

Job Function	Environmental Responsibility
HAZMAT Carrier	HAZMAT Carriers transport HM via public highway and must be trained. The carrier must understand MSDSs 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 MSDSs 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.
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 MSDSs, 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. ECOs must have a general understanding of all Army environmental programs and their relationship to each unit or activity's operation.

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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 Office at 253-512-8717.

- 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
- Dirt, Contaminated (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

(Continued on the next page)

- Used Oil (For Recycle)
- Pharmaceutical Waste
- Pharmaceutical Waste – Albuterol Inhalers
- Pharmaceutical Waste – Silver Nitrate Swabs
- Weapons Cleaning Debris

ABSORBENTS - CONTAMINATED WITH ANTIFREEZE

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

ATTENTION!

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 Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NON-HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

Step 1 Select an Approved Container

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

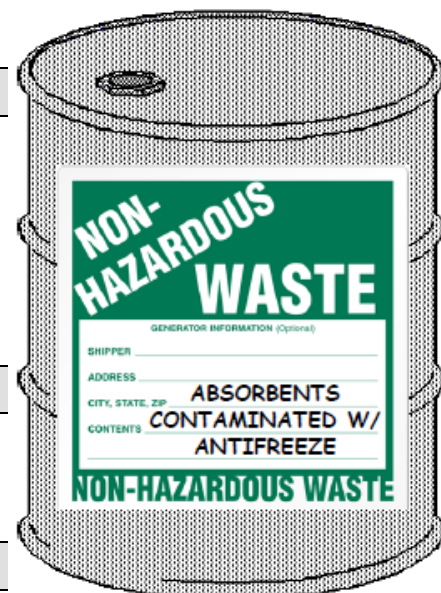
- Approved Container: Removable head drum

Step 2 Prepare, Mark and Label the Container

Labels or markings should clearly show:

- The words “**NON-HAZARDOUS WASTE**”

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 absorbed product’s MSDS.
- Add used absorbents to container, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to containers of non-hazardous waste.

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.

ABSORBENTS - CONTAMINATED WITH POL

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

ATTENTION!

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). Absorbent materials used to clean up other products must be characterized separately. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NON-HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

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

Step 2 Prepare, Mark and Label the Container

Labels or markings should clearly show:

- The words “**NON-HAZARDOUS WASTE**”

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

Step 3 Put Waste in the Container

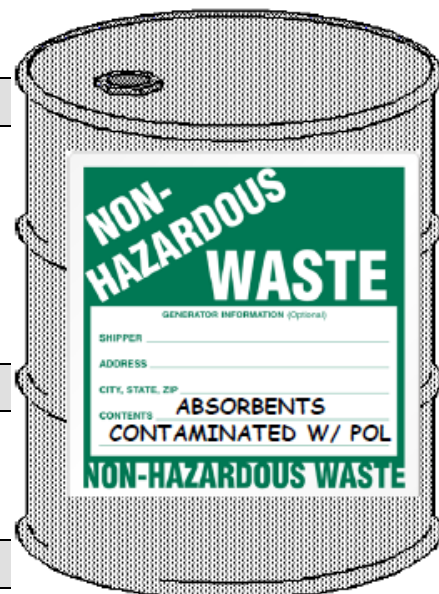
- Wear the proper PPE listed on the absorbed product’s MSDS.
- Add used absorbents to container, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to containers of non-hazardous waste.

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.



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 may be disposed of in the trash. Aerosol cans that contain(ed) insecticides, herbicides, fungicides and chlorinated solvents must be managed differently. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) 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

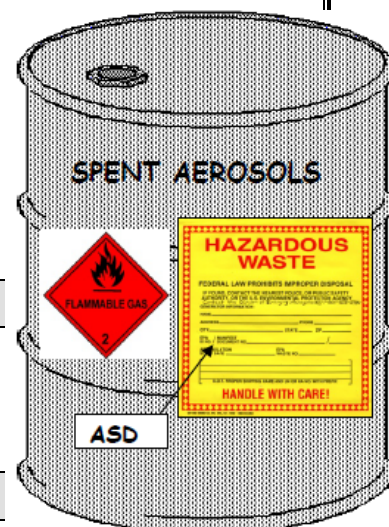
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

- Wear the proper PPE listed on the product's MSDS.
- 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 Dangerous Waste 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 Dangerous Waste

ATTENTION!

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. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept of Ecology – **NOT CONSIDERED DANGEROUS WASTE IF RECYCLED**
- 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: Non-removable head drum

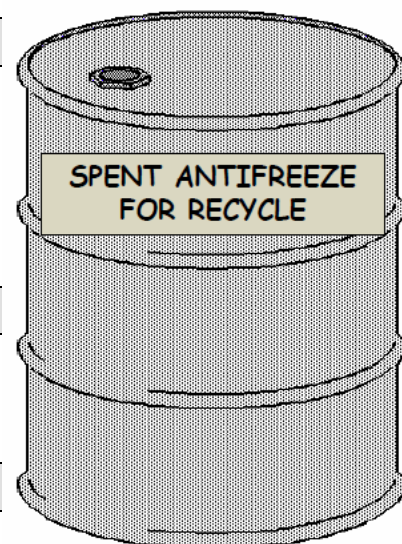
NOTE: UN-approved containers are required for accumulation and transportation of this waste. Typically, the original container should be used for accumulation of spent antifreeze.

Step 2 Prepare, Mark and Label the Container

Ensure containers are clearly labeled or marked with the following:

- contents of container: **“SPENT ANTIFREEZE FOR RECYCLE”**

The container should resemble the figure on the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product's MSDS.
- Add spent antifreeze, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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.

AQUEOUS PARTS WASHER SLUDGE

All Aqueous Parts Washer Sludge

ATTENTION!

This WPS applies to sludge generated from aqueous parts washers. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) 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

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

- Approved Container: Removable head drum

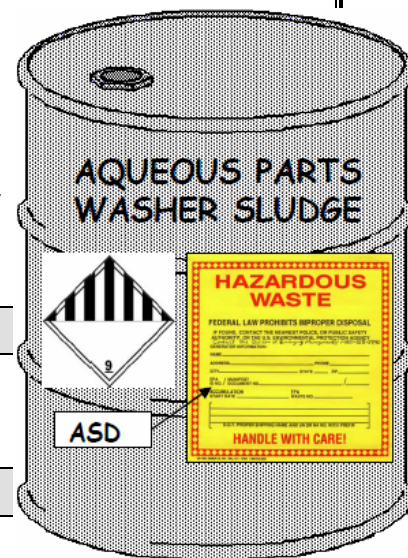
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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 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

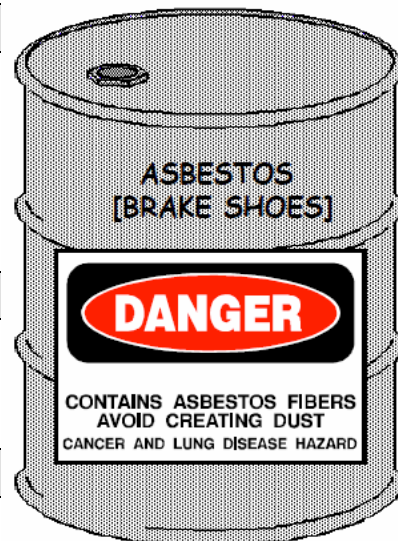
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

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 MSDS.
- 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.

BATTERIES - ALKALINE

All Used Alkaline Batteries

ATTENTION!

This WPS applies ONLY to used alkaline batteries.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **UNIVERSAL WASTE**
- Transportation – U.S. Department of Transportation – **DOT HAZARDOUS MATERIAL (Class 8)**

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: UN-approved bucket with lid

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

Step 2 Prepare, Mark and Label the Container

Labels on universal waste containers should clearly show:

- The words “**UNIVERSAL WASTE**”
- **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 MSDS.
- Add used batteries and then secure the container.

Step 4 Accumulate Waste in an Approved Location

You can accumulate universal waste batteries for one year from the Accumulation Start Date.

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.

BATTERIES – NON-ALKALINE

All Used Lithium, Magnesium, Mercury, and Nickel-Cadmium

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

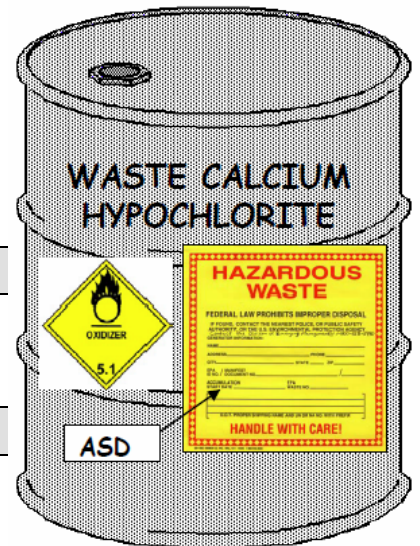
Step 1	Select an Approved Container
<p>Determine if a container has already been established for your waste. If one has, skip to Step 3.</p> <ul style="list-style-type: none"> • Approved Container: UN-approved bucket with lid (separate bucket for each type of battery). <p>NOTE: UN-approved containers 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 MSDS. • <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 Accumulation Start Date.</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 Office (253-512-8717) 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 or metal (not aluminum) 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 dangerous waste containers should clearly show:</p> <ul style="list-style-type: none"> • The words “DANGEROUS WASTE” or “HAZARDOUS WASTE” • Risk labels, such as Flammable, Corrosive or 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 MSDS. • 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 Dangerous Waste 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. 	



DIRT, CONTAMINATED

Dirt contaminated POL (i.e., spill cleanup debris)

ATTENTION!

This WPS applies ONLY to soils contaminated with POL. Dirt contaminated with other products must be characterized separately. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NON-HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

Step 1 | Select an Approved Container

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

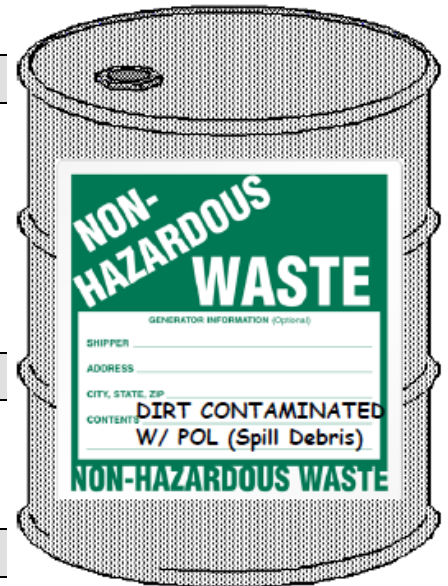
- Approved Container: Small Amounts – Clear plastic trash bags (double-bagged)
Large Amounts – Removable head drum

Step 2 | Prepare, Mark and Label the Container

Labels or markings should clearly show:

- The words “**NON-HAZARDOUS WASTE**”

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 absorbed product’s MSDS.
- Add dirt to container, and then secure the container.

Step 4 | Accumulate Waste in an Approved Location

Accumulation time limits do not apply to containers of non-hazardous waste.

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 FILTERS - MOGAS

All Spent MOGAS Fuel Filters

ATTENTION!

This WPS applies ONLY to spent MOGAS fuel filters.

Drain free-flowing fuel from filters, and manage IAW the WPS for Off-Spec Gasoline.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **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

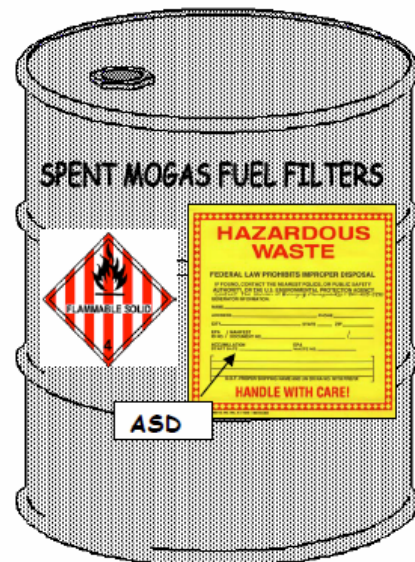
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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 FILTERS – METAL ENCASED – DIESEL/JP-8/OIL FOR RECYCLE

ATTENTION!

This WPS applies to metal-encased oil filters as well as metal-encased diesel and JP-8 fuel filters. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

Drain free-flowing fuel from filters, and manage IAW the WPS for Off-Spec JP-8/Diesel.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NOT CONSIDERED DANGEROUS WASTE IF RECYCLED**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

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

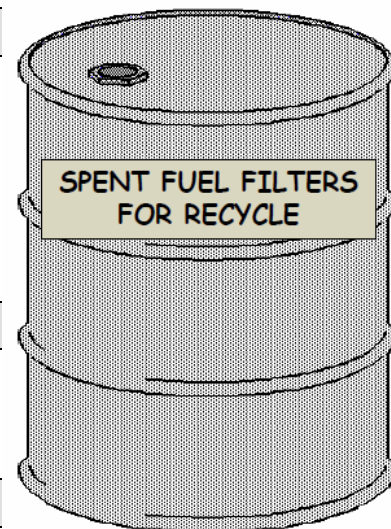
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Clearly label or mark the container with the following information:

Contents of container: **SPENT FUEL FILTERS FOR RECYCLE** or **SPENT OIL FILTERS FOR RECYCLE** (if container is only used for oil filters)

The container should resemble the figure on the right.



Step 3 Put Waste in the Container

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

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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 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 Office (253-512-8717) 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

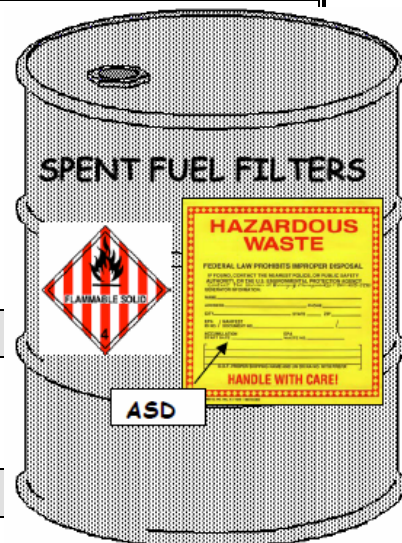
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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 Office (253-512-8717) for assistance regarding other types of fuel.

REGULATORY STATUS

- 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

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

- Approved Container: Removable head plastic or metal drum

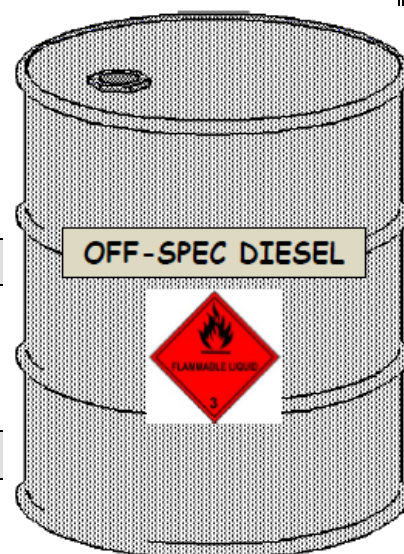
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Clearly label or mark the container with the following information:

- Contents of container
- Risk label(s), such as Flammable, Corrosive or Toxic

The container should resemble the figure on the right.



Step 3 Put Waste in the Container

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

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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 MOGAS

All Off-Spec MOGAS

ATTENTION!

This WPS applies ONLY to off-spec or unusable gasoline (MOGAS).

REGULATORY STATUS

- 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**

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

- Approved Container: Closed-head plastic or metal container

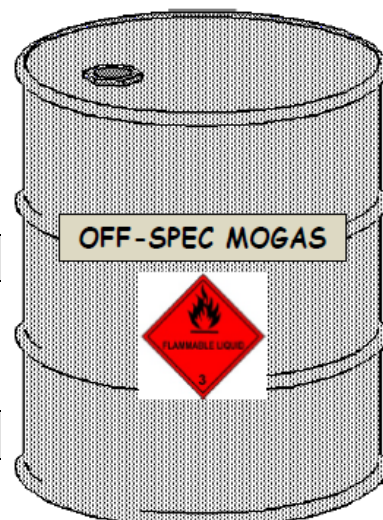
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 **Prepare, Mark and Label the Container**

Clearly label or mark the container with the following information:

- Contents of the container
- Risk label(s), such as Flammable, Corrosive or Toxic

The container should resemble the figure on the right.



Step 3 **Put Waste in the Container**

- Wear the proper PPE listed on the product's MSDS.
- Add spent fuel, and then secure the container.

Step 4 **Accumulate Waste in an Approved Location**

Accumulate time limits do not apply to this waste stream.

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.

GREASE, OFF-SPEC

ATTENTION!

This WPS applies ONLY to grease. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NON-HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

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

Step 2 Prepare, Mark and Label the Container

Labels or markings should clearly show:

- The words “**NON-HAZARDOUS WASTE**”

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 MSDS.
- Add waste, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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.

LIGHT BULBS

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

ATTENTION!

This WPS does not apply to fluorescent and halogen bulbs, which can be bagged and disposed of in the dumpster.

This WPS does not apply to broken bulbs, which must be managed differently. Contact your supporting maintenance activity or the Environmental Office (253-512-8717) 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.

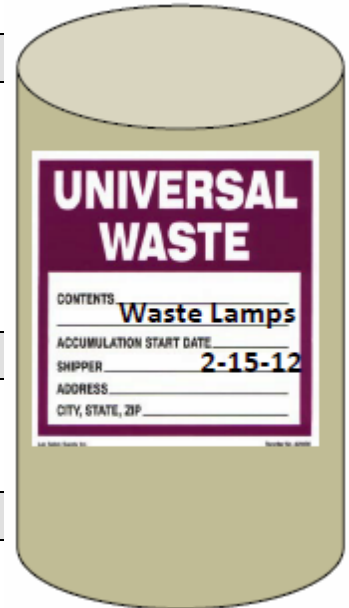
- Approved Container: Place in cardboard box or fiberboard drum. Used light tubes can be stored in their original box but must be labeled as shown below.

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 container 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 Accumulation Start Date.

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 Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **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 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 dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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 Office (253-512-8717) 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 head drum

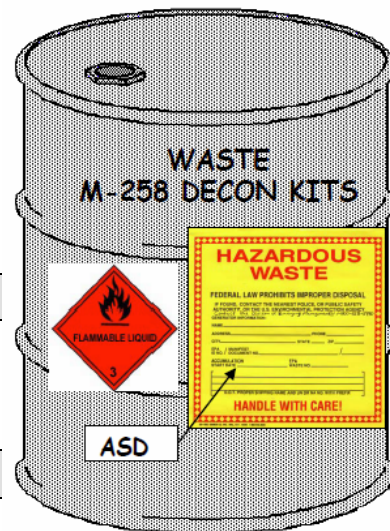
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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

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

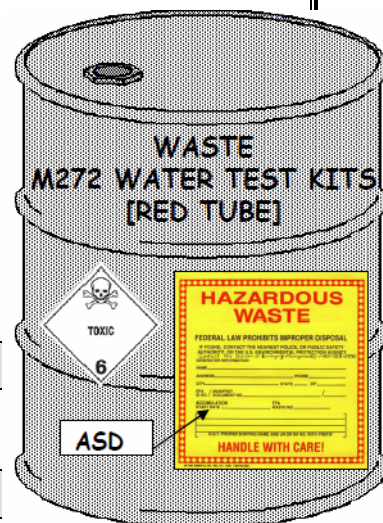
- Approved Container: UN-approved bucket (separate bucket for each type of test kit).

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

Wear the proper PPE listed on the product's MSDS.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste Accumulation Area IAW Chapter 4.

Step 5 Turn-in Procedures

- **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 Office for assistance (253-512-8717).
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 	
The container should look similar to the figure on the right.	
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 Environmental Office.	



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, whether the heaters have been activated or not. 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

If possible, use the original container when possible to turn in case lots of unused MRE heaters.

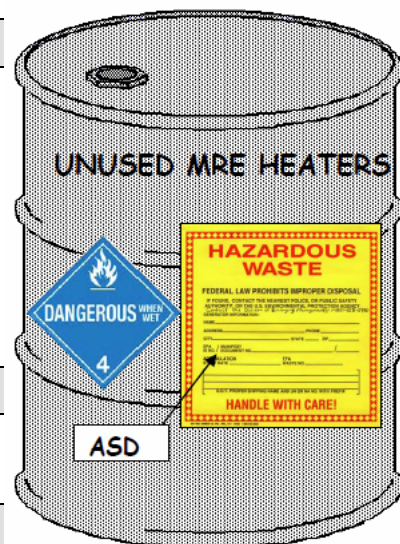
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

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.

Accumulate waste in the Dangerous Waste 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.

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 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 dangerous waste (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.

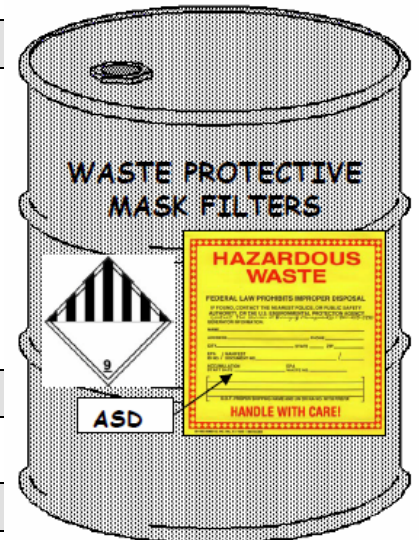
NOTE: UN-approved containers are required for proper accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words "**DANGEROUS WASTE**" or "**HAZARDOUS WASTE**"
- **Risk label(s)**, such as Flammable, Corrosive or 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

- Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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!

Night vision intensifier tubes contain cadmium and lead.

Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) 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

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

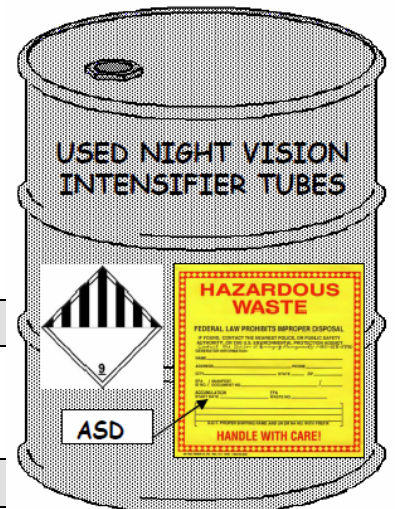
NOTE: UN-approved containers are required for proper accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk labels**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

OIL CANS, CRUSHED – FOR RECYCLE

ATTENTION!

This WPS applies to ONLY to crushed oil cans. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NOT CONSIDERED DANGEROUS WASTE IF RECYCLED**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

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 metal container

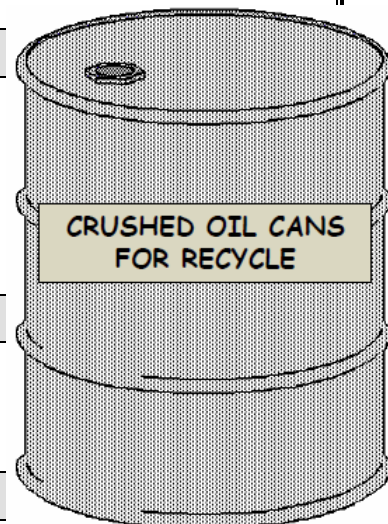
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Clearly label or mark the container with the following information:

- contents of container: **CRUSHED OIL CANS FOR RECYCLE**

The container should resemble the figure on the right.



Step 3 Put Waste in the Container

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

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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.

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 Office (253-512-8717) 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

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

- Approved Container: Removable head drum

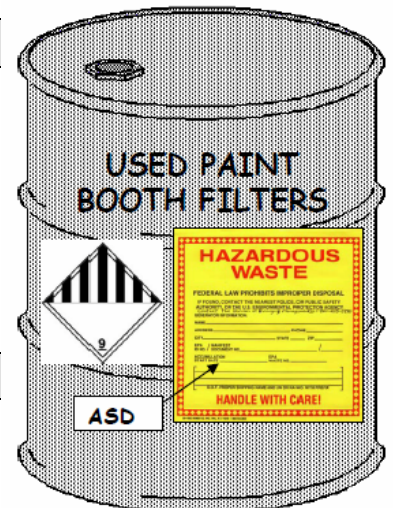
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

PAINT RELATED MATERIAL, LIQUID – NON-LATEX

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

ATTENTION!

This WPS applies ONLY 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 managed according to a different WPS. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) 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

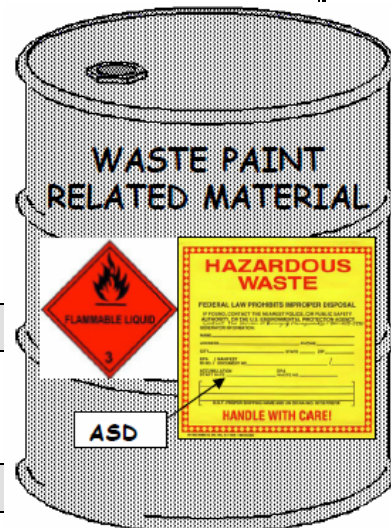
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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 Office (253-512-8717) 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

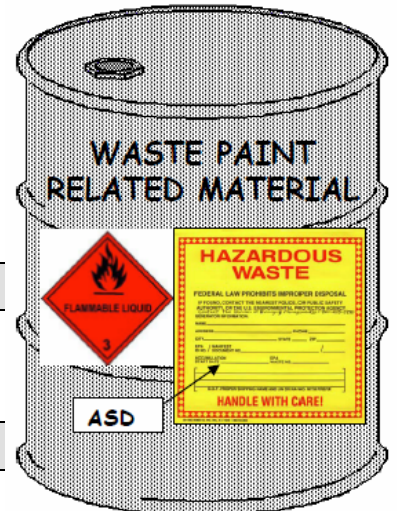
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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 Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- 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

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

- Approved Container: Removable head metal or plastic drum

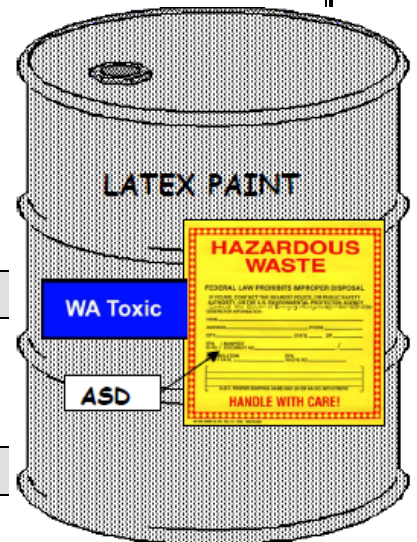
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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 Office (253-512-8717) 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

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

- Approved Container: Removable-head drum

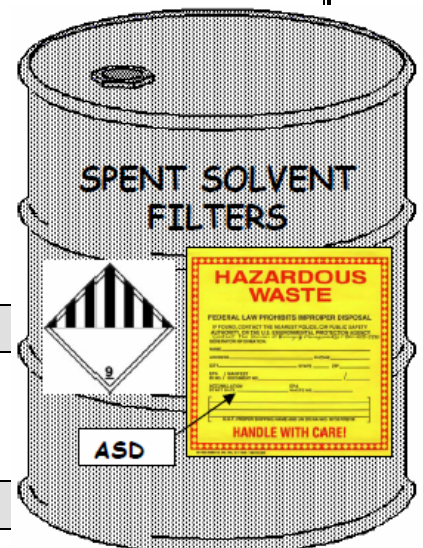
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

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

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

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

All Spent PD-680 Type II or III

ATTENTION!

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 Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- 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

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

- Approved Container: Non-removable head metal or plastic drum

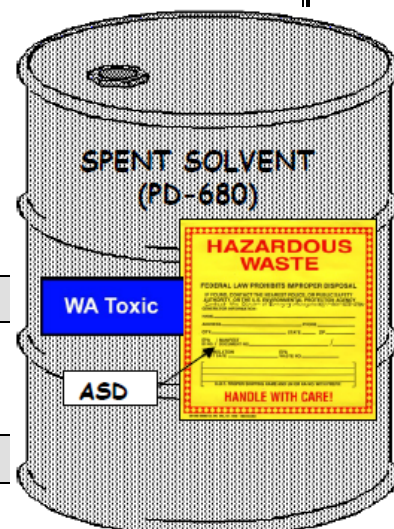
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**DANGEROUS WASTE**” or “**HAZARDOUS WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

- Wear the proper PPE listed on the product's MSDS.
- Add solvent then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste 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.

UNKNOWN WASTES

All Unknown Wastes

ATTENTION!

This WPS applies to all unknown wastes. Immediately contact the WMD Environmental Office upon discovery (253-512-8717).

REGULATORY STATUS

- 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

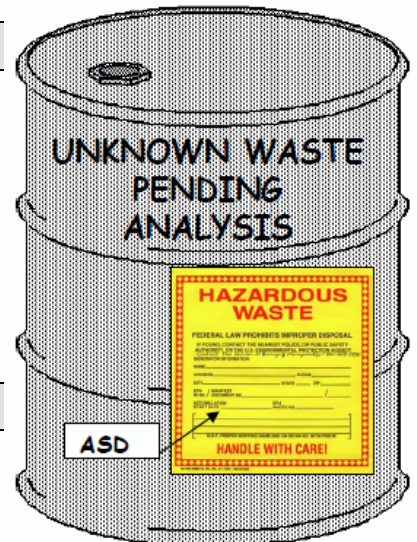
- Approved Container: Original container if in good condition. Otherwise, use an over-pack drum.

Step 2 Prepare, Mark and Label the Container

Labels should clearly show:

- 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

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



Step 3 Put Waste in the Container

Wear appropriate PPE.

Step 4 Accumulate Waste in an Approved Location

Accumulate waste in the Dangerous Waste Accumulation Area IAW Chapter 4.

Step 5 Turn-in Procedures

- **Units** contact your supporting maintenance activity for disposal instructions.
- **Maintenance activities** contact the WMD Environmental Office for disposal options (253-512-8717). 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 dangerous waste. If used oil is contaminated with dangerous waste such as solvent, it is a dangerous waste. Contact your supporting maintenance activity or the WMD Environmental Office (253-512-8717) for assistance.

REGULATORY STATUS

- Environmental – WA Dept of Ecology – **NOT CONSIDERED DANGEROUS WASTE IF RECYCLED**
- Transportation – U.S. Department of Transportation – **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: Plastic or metal non-removable head drum

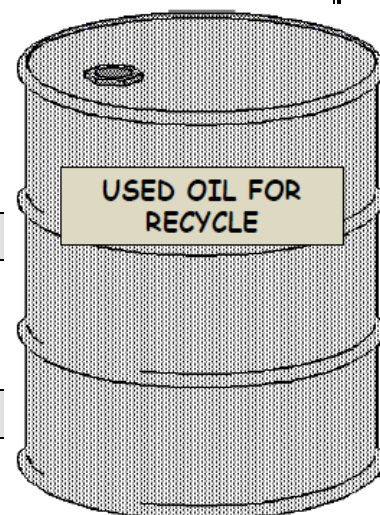
NOTE: UN-approved containers are required for accumulation and transportation of this waste.

Step 2 Prepare, Mark and Label the Container

Clearly label or mark the container with the following information:

- contents of container: **USED OIL FOR RECYCLE**

The container should resemble the figure on the right.



Step 3 Put Waste in the Container

- Wear the proper PPE listed on the product's MSDS.
- Add used oil and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulation time limits do not apply to this waste stream.

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.

PHARMACEUTICAL WASTE

ATTENTION!

With the exception of controlled substances, all open or partially used pharmaceuticals are considered dangerous waste 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 containers (refer to the WPS for albuterol inhalers and silver nitrate swabs).

For more detail about pharmaceutical waste management, refer to Appendix D of the WMD Dangerous Waste Management Plan. You may also call the Environmental Office at 253-512-8717 if you need assistance.

REGULATORY STATUS

- 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

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

- Approved Container: UN-approved bucket

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

Step 2 Prepare, Mark and Label the Container

Labels on pharmaceutical waste containers should clearly show:

- The words “**NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location

- Accumulate waste in the Dangerous Waste Accumulation Area IAW Ch 4.
- You can accumulate pharmaceutical waste for 180 days from the Accumulation Start Date.

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.

PHARMACEUTICAL WASTE – ALBUTEROL INHALERS

ATTENTION!

The profile applies ONLY to discarded albuterol inhalers.

For more detail about pharmaceutical waste management, refer to Appendix D of the WMD Dangerous Waste Management Plan. Call the Environmental Office at 253-512-8717 if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **HAZARDOUS MATERIAL (Class 2.2)**

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: UN-approved bucket

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

Step 2 Prepare, Mark and Label the Container

Labels on pharmaceutical waste containers should clearly show:

- The words “**NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location

- Accumulate waste in the Dangerous Waste Accumulation Area IAW Ch 4.
- You can accumulate pharmaceutical waste for 180 days from the Accumulation Start Date.

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.

PHARMACEUTICAL WASTE – SILVER NITRATE SWABS

ATTENTION!

The profile applies ONLY to silver nitrate swabs.

For more detail about pharmaceutical waste management, refer to Appendix D of the WMD Dangerous Waste Management Plan. Call the Environmental Office at 253-512-8717 if you need assistance.

REGULATORY STATUS

- Environmental – WA Department of Ecology – **DANGEROUS WASTE**
- Transportation – U.S. Department of Transportation – **HAZARDOUS MATERIAL (Class 5.1)**

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: UN-approved bucket

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

Step 2 Prepare, Mark and Label the Container

Labels on dangerous waste containers should clearly show:

- The words “**NON-VIABLE HAZARDOUS PHARMACEUTICAL WASTE**”
- **Risk label(s)**, such as Flammable, Corrosive or 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

Add waste and then secure the container.

Step 4 Accumulate Waste in an Approved Location

- Accumulate waste in the Dangerous Waste Accumulation Area IAW Ch 4.
- You can accumulate pharmaceutical waste for 180 days from the Accumulation Start Date.

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.

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 Office (253-512-8717) if you need assistance.

REGULATORY STATUS

- Environmental – WA Dept. of Ecology – **NON-HAZARDOUS WASTE**
- Transportation – U.S. Department of Transportation – **NOT REGULATED BY DOT**

Step 1 Select an Approved Container

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

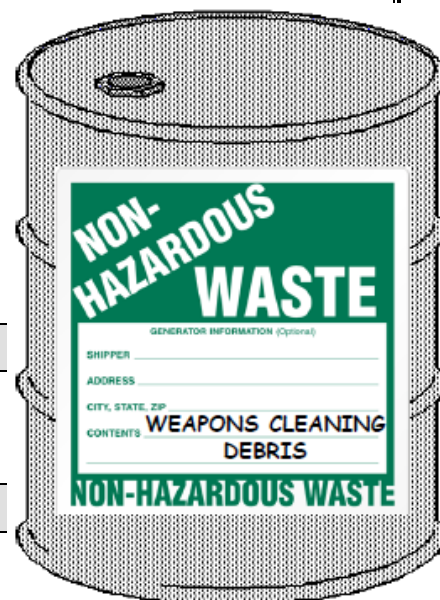
- Approved Container: Small Amounts – Clear plastic trash bags (double-bagged)
Large Amounts – Removable head drum

Step 2 Prepare, Mark and Label the Container

Labels or markings should clearly show:

- The words “**NON-HAZARDOUS WASTE**”

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 MSDS.
- Add waste, and then secure the container.

Step 4 Accumulate Waste in an Approved Location

Accumulate time limits do not apply to this waste stream.

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.

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Appendix B

SPILL RESPONSE PROCEDURES

Emergency response activities relating to DW, such as spills or fires, shall be conducted in accordance with the applicable site-specific Installation Contingency Plan/Spill Prevention, Control and Countermeasure (ICP-SPCC) Plan. A quick reference guide is provided below.

If You Detect a Spill of a Known Hazardous Material

If the spill can be contained safely by the responsible organization:

- STEP 1. Contain and/or control the release. Close valves, disconnect pumps or plug lines as necessary to prevent further discharge.
- STEP 2. Notify the Joint Operations Center (253-512-8773) or toll free (888-276-4362), and provide the following information:
- Name and phone number of individual reporting spill
 - Location of spill
 - Number of injured personnel and nature of injuries (if applicable, call 911 immediately)
 - Substance spilled
 - Amount spilled (estimated)
 - Rate material is currently spilling (estimated)
 - Time spill occurred
 - Extent to which spill has traveled
 - Resources affected (i.e., soil or surface waters)
 - Any efforts that have been made to control the spill
 - Any additional information (i.e., other potential hazards).
- STEP 3. Using appropriate PPE, clean up the release using proper absorbent media for the substance spilled. Recover as much of the spill as possible with absorbent materials. If soils are impacted by the spill, surface-scrape (about 1/4 inch of soil at a time) until you reach clean dirt (i.e., no visible stain or odor). Do not hose spilled material into floor drains or storm drains.
- STEP 4. Containerize or double-bag contaminated media (soil, gravel, etc.) for disposal. Label the contents (i.e., "Contaminated Absorbent" or "Contaminated Soil"). Contact the WMD Environmental Office and/or DW Program Manager for direction regarding DW turn-in.

If the Spill Cannot be Safely Contained by the Responsible Organization

- STEP 1. Activate emergency alarm system, if any.
- STEP 2. Evacuate to an area upwind of the spill, if warranted by type of release.
- STEP 3. Ensure all employees shut down their operations and secure their equipment, if time permits.
- STEP 4. Notify the Joint Operations Center (253-512-8773) or toll free (888-276-4362), and provide the following information:
- Name and phone number of individual reporting spill
 - Location of spill
 - Number of injured personnel and nature of injuries (if applicable call 911 immediately)
 - Substance spilled
 - Amount spilled (estimated)
 - Rate material is currently spilling (estimated)
 - Time spill occurred
 - Extent to which spill has traveled
 - Resources affected (i.e., soil or surface waters)
 - Any efforts that have been made to control the spill
 - Any additional information (i.e., other potential hazards).
- STEP 5. Stop the source of the spill when possible without undue risk of personal injury, including the use of on-site spill containment equipment and materials.
- STEP 6. Make the spill scene OFF LIMITS to unauthorized personnel.
- STEP 7. Restrict or eliminate all sources of ignition.
- STEP 8. Report to the On-Scene Coordinator (OSC) or Incident Commander (IC) upon his arrival.
- STEP 9. Ensure an employee roll call is conducted to ensure all personnel are accounted for and not trapped in the affected area.
- STEP 10. Perform or assist with the post-emergency cleanup operations within the activity's capabilities and under the direction of the WMD Environmental Office.

Release of Unknown Origin, Discovery of Abandoned Waste

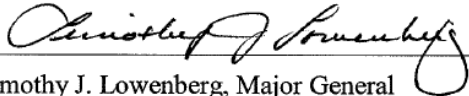
WMD personnel will report all releases of unknown origin or discoveries of abandoned wastes to the Joint Operations Center and await instructions from the WMD Environmental Office. Do not come in contact with unknown or abandoned wastes.

Spill Response Forms

This section contains the following forms and figures:

- Unified Spill Reporting Policy No. 10-04
- Emergency Response Notification and Spill Response Flowchart
- Spill Incident Report Form

**Unified Washington Military Department and National Guard Policy
No. 10-04**

Title	Spill Reporting
References	WAC 173-303-145(2)
Cross-Reference Number	Military Department Policy EMS-500-1-05-10
Information Contact	Washington Military Department Environmental Office Building #36, Camp Murray (253) 512-8717
Effective Date	January 1, 2011
Revised	New
Approved By	 Timothy J. Lowenberg, Major General The Adjutant General WMD Director

Purpose

The purpose of this policy is to provide a consistent and unified reporting structure for Washington Military Department (WMD) communications with local, state and federal regulators in the event of a spill emergency. A spill emergency is an accidental release or discharge of a known or unknown substance, that by its release poses potential harm to the environment (human, ground, water or air).

Scope

This policy applies to all state and federal civilian employees of the WMD and all members of the Washington National Guard.

Policy

This policy outlines the reporting requirements for any hazardous material spill on Military Department property:

- Life threatening spill emergencies should be reported to emergency services through the 911 system. After a spill-related call is reported to 911, a follow up call must be made to the Joint Operations Center (JOC).
- Non-life threatening spill emergencies must be reported to the JOC upon discovery even as the unit containment and cleanup plans are initiated. The JOC will assure the report is

forwarded to the Environmental Section within the Joint Facilities and Environmental Services as soon as possible. The Environmental Section will assure response efforts and reporting requirements are met.

- Spills that occur on WMD properties located on federal facilities, (e.g. Joint Base Lewis McCord, Yakima Training Center and Fairchild Air Force Base) must also be reported according to that federal facility's spill prevention plan or the base/tenant support agreement. Additional reporting requirements may be specified by the managing WMD division, and may be outlined in a Spill Prevention Countermeasure and Control Plan (SPCCP).

The JOC is located in Building 17 and can be reached at:
On Camp Murray: (253) 512-8773
Externally: (888) 276-4362

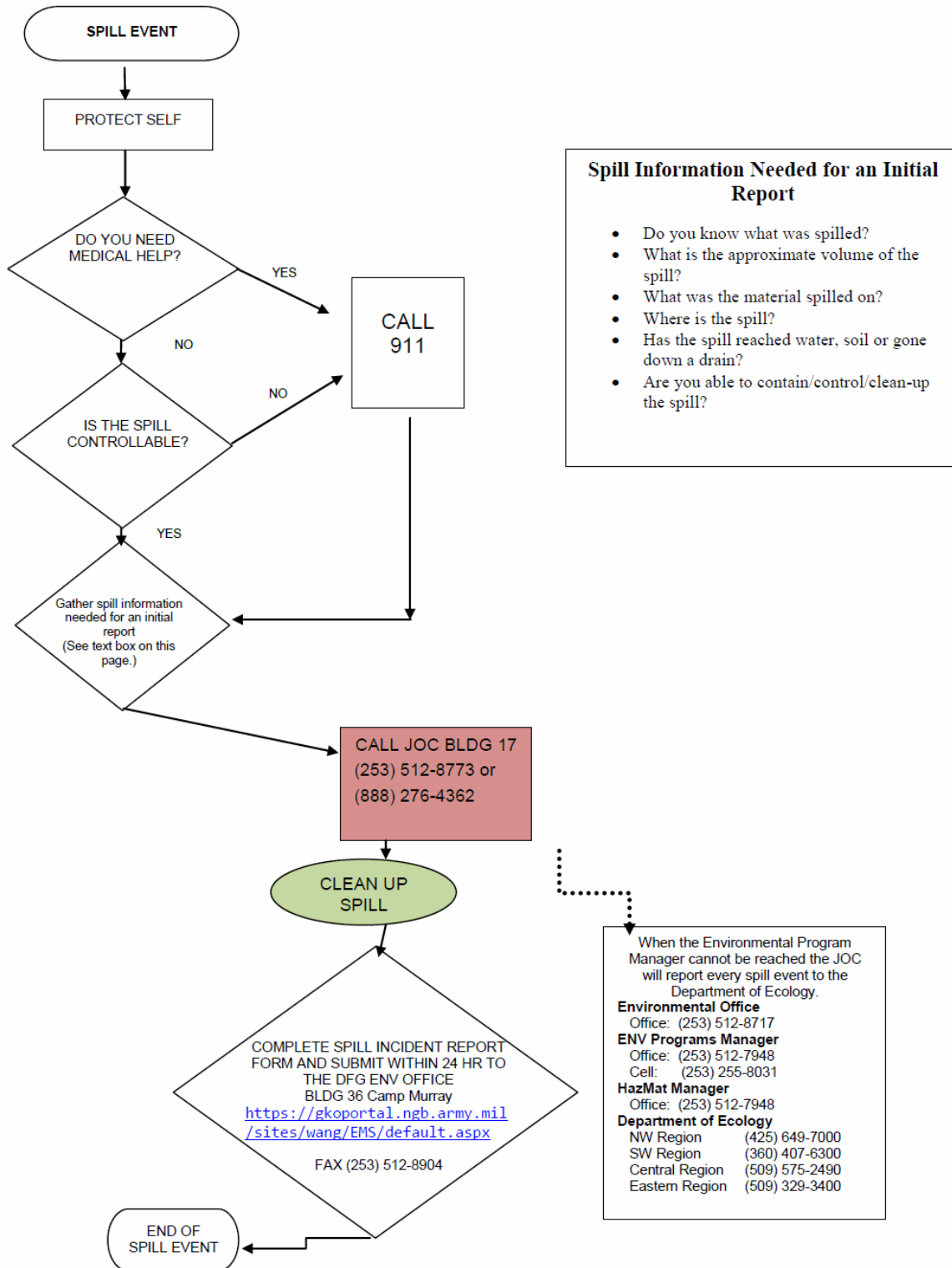
The Environmental Program Section of the Joint Facilities and Environmental Services is the point of contact for agency environmental hazardous-materials spill reporting activities to the Department of Ecology. The Environmental Section's phone number: (253) 512-8717.

Responsibilities

The Environmental Program Manager of Joint Facilities and Environmental Services is designated as the agency point of contact for communications with other agencies regarding spill reports.

The JOC is designated as the twenty-four hour-a-day; seven-day-a-week (24/7) response dispatcher for spill incidents and will initiate the WMD procedures for spill response by contacting the Environmental Program Manager or designated spill coordinator within the Environmental Program section. The JOC initiates the primary notification procedure; however there may be secondary notification procedures within different divisions of the WMD.

EMERGENCY RESPONSE NOTIFICATION AND SPILL RESPONSE FLOWCHART



SPILL INCIDENT REPORT

1. **FACILITY NAME:** _____
ADDRESS: _____
CITY or TOWN: _____
Nearest Highway or Intersection: _____

2. **DATE AND TIME OF INCIDENT:** _____

3. **NAME AND TEL. NUMBER OF ON-SCENE CONTACT:** _____

4. **SEVERITY OF THE INCIDENT:** Spill Fire Explosion Other _____

a. Name of Spilled Material: _____

b. Total Amount Spilled (lbs, gal): _____

c. Amount Recovered (lbs, gal): _____

d. Fate of Recovered Materials (i.e., oil, water, soil, absorbents): _____

Facility Evacuated Injuries: _____ Spill Team Activated Photos

5. **SIGNIFICANT AREAS AFFECTED BY THE SPILL:** (Indicate location of any of the following affected areas, and estimate amount spilled in or on each area). **Affected Area (sq ft):** _____

- Building Area Surface Water
 Floor Drains Storm Drains
 Drainage Ditches Soil or Gravel Surfaces

SPECIFICS

Nearest body of water: _____

6. **LOCAL TERRAIN CONDITIONS:** (Check off most appropriate description).

- Flat: (no significant slope) Somewhat Flat: (1-5% slope) Gently Rolling: (5-10% slope)
 Sharply Rolling: (10-20% slope) Steep: (>20% slope)

7. **WEATHER CONDITIONS:** (Check off most appropriate condition).

- Dry Fog or Drizzle Rain Snow Other

8. **CAUSE AND SOURCE OF INCIDENT:** (Check off most appropriate choice and give a brief description of the problem): _____

- Equipment Failure Accident Human Error Other

9. **OFFICES NOTIFIED:** (Check-off the offices that were notified and the name of the person who took the report over the telephone).

- CFMO/ENV Office WA DOE
 Emergency Operations Center JOC
 National Response Center Other

Name: _____
Org: _____
Position: _____
Phone: _____

Name: _____
Org: _____
Position: _____
Phone: _____

10. **FUTURE PREVENTION:** (Note any equipment repairs or other measures taken to prevent recurrence): _____

Send or Fax Spill Report after initial cleanup has been completed and as conditions allow.

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Appendix C

MANAGING DANGEROUS WASTE IN THE FIELD

Dangerous waste 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 dangerous wastes and hazardous materials in the field occurs throughout the following stages:

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

This appendix provides detailed instructions for managing dangerous waste and hazardous materials 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 Yakima Training Center (YTC), and applies to WAARNG personnel. The WAARNG adopts FL 200-1 waste and material guidelines for operations conducted at Local Training Areas and Camp Murray as well. This appendix applies to the following training areas:

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

Preparation & Planning

Units and activities must consider hazardous material and dangerous waste 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 hazardous materials must have appropriate placards, if applicable
- Drivers of hazardous materials must be trained in accordance with DOT standards
- Units must obtain supplies to prevent and prepare for spills to the environment
- Units must obtain supplies to manage dangerous wastes, such as containers, labels, etc.
- Units must have a current MSDS 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 hazardous materials 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 hazardous materials that are opened and in-use.
- Step 4. Perform weekly inspections on hazardous materials 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 “Polysafetypack” 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 in accordance with 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, Yakima Training Center, 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 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 subinstallation) must have proper U.S. Department of Transportation (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 hazardous materials (HM) and Dangerous Wastes (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 MSDSs 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?			
DANGEROUS WASTE 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)

DANGEROUS WASTE 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 Yakima Training Center. 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):

_____ _____ _____ _____
_____ _____ _____ _____

WMD Dangerous Waste Management Plan

- 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 be 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*)
 - _____

WMD Dangerous Waste Management Plan

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 be immediately reported to the Operations Center by calling 577-3280.
 - (2) Spills occurring in the Range Area will 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) Time spill occurred or was first observed.
 - (2) Where spill occurred and unit's present location, if unit is moving.
 - (3) Type of material spilled.
 - (4) Estimated quantity of material spilled, or if still leaking, rate of release.
 - (5) Environmental conditions such as wind direction and speed, precipitation, cloud cover. etc.
 - (6) Description of the area likely to be affected such as river or stream banks, private properties, and wildlife areas.
 - (7) Cause of spill.
 - (8) Actions being taken to contain and control the spill.
 - (9) Agencies already notified.
 - (10) 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

Managing Dangerous Waste in the Field

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.
- g. 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; Annual Training; Deployment) designate as dangerous waste if discarded and must be managed in accordance with 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 Dangerous Waste 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 dangerous waste in accordance with 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 in accordance with 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 dangerous waste 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 dangerous waste turn-in).

DRMO Waste Turn-In Request												
Unit/Activity:			Facility:			POC:			Phone#:			
											USPFO & CFMO-ENV use only	
Item #	Nonreclosure	Waste Profile # or MSDS	Hazard Class	Solid, Liquid, Gas?	URI Container Type	Container Size	# of Containers	Weight in Pounds	EPA/State Waste Code	CLIN	Total Cost Per Item	Reimb Y/N
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												
17												
18												
19												
20												

MIL FORM 3161a

STEP 3. Your supporting maintenance facility will forward the Dangerous Waste Turn-in Request to the USPFO Warehouse. The USPFO will complete the required paperwork and send it to DRMO.

STEP 4. The USPFO will contact the requesting unit/activity with a pickup date. DRMO will most likely pick up pharmaceutical waste at the same time as other dangerous wastes.

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

Figure D-1. Management of Waste Pharmaceuticals Flow Chart

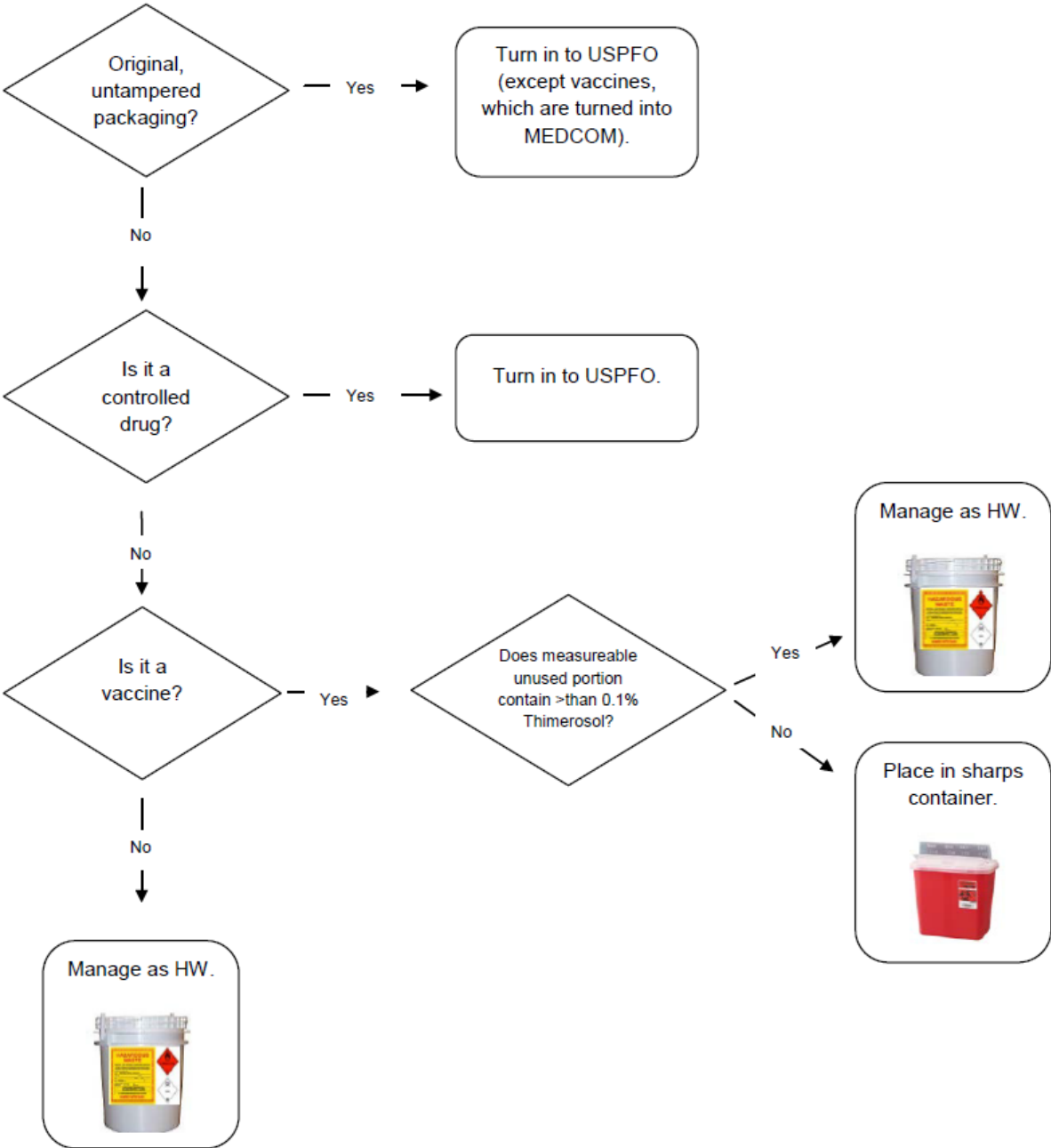




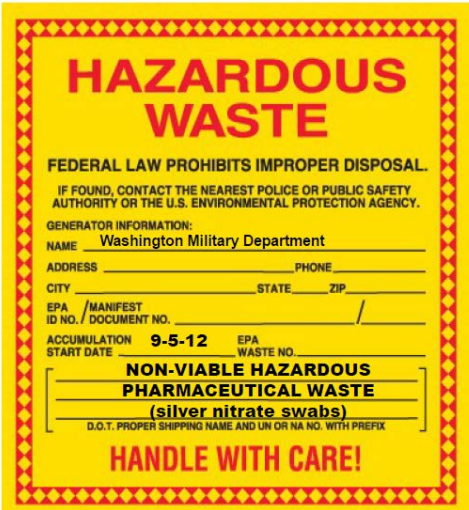



Table D-1. Accumulation Requirements for Pharmaceutical Waste

Accumulation Amount	No limit
Accumulation Time Limit	180 days
Appropriate Container	UN-approved containers
Container Labeling	Containers must be marked or labeled with the following information: <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 dangerous waste (i.e., Environmental Compliance Officer 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

Dangerous waste 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 dangerous waste 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, dangerous waste 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 and Army regulations mandate dangerous waste 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 dangerous waste 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 dangerous wastes

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 DRMO; the acid then becoming a dangerous waste. The production of spent sulfuric acid represented the second largest dangerous waste 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 off-set 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 dangerous waste. 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 in the trash

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 Environmental Office located an antifreeze recycling service

Result: Because the spent antifreeze is recycled, it does not count towards dangerous waste generator status

Shop Towel Laundering

Issue: Contaminated rags may be considered dangerous waste 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, DRMO.*

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 Environmental Compliance Officer (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 Environmental Office 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 hazardous waste?

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

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.***

WMD Dangerous Waste Management Plan

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.hq.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 dangerous waste must ensure their operations are in compliance with site procedures. A single Environmental Protection Agency (EPA) identification number identifies each contiguous site generating dangerous waste. 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 dangerous waste 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 dangerous wastes 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 dangerous waste be self-transported off-site?

A: *No. Dangerous waste, 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, dangerous waste will be turned in through coordination with the installation's Environmental Office. Dangerous waste generated at armories will be consolidated (State Maintenance AND Unit wastes collected together) and a pick-up by DRMO will be arranged through the USPFO.*

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 dangerous wastes?

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 dangerous waste generators and their waste. Identification numbers are required for medium and large quantity generators. Small quantity generators with EPA ID numbers have usually had medium or large quantity status in the past. Refer to Chapter 3 of this plan for a description of each generator type.

The table below identifies the generator status of WMD facilities. As shown, generator status can vary from year to year based on the amount of waste generated or accumulated. The WMD Environmental Office (253-512-8717) will notify appropriate personnel in the event of significant changes to a facility's generator status.

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

Generator Name	Location	EPA ID Number	Status 2009	Status 2010	Status 2011
CSMS	Camp Murray	WAD980725626	LQG LQHUUW	LQG LQHUUW	LQG LQHUUW
MATES	Yakima	WA4214005395	LQG SQHUW	LQG SQHUW	LQG SQHUW
UTES	Fort Lewis	WAD981772205	MQG LQHUUW	MQG LQHUUW	inactive*
AASF#1	Fort Lewis	WA 6211890052	MQG LQHUUW	inactive*	inactive*
FMS #1	Seattle	WA1211890040	MQG SQHUW	LQG SQHUW	MQG SQHUW
FMS #2	Ephrata	WAD981772130	XQG SQHUW	SQG SQHUW	MQG SQHUW
FMS #3	Sedro Woolley	WAH000003814	SQG SQHUW	XQG SQHUW	SQG LQHUUW
FMS #4	Montesano	WA9211890034	MQG SQHUW	SQG SQHUW	XQG SQHUW
FMS #5	Spokane	WA5921180043	SQG SQHUW	XQG SQHUW	XQG* SQHUW
Armory	Grandview	WAH000039451	N/A	LQG SQHUW	XQG SQHUW
Armory	Kent	WA0211890041	MQG SQHUW	XQG SQHUW	XQG SQHUW
Armory	Bremerton	WAH000039451	XQG SQHUW	MQG SQHUW	XQG SQHUW
Armories	Statewide	Exempt**	SQG SQHUW	SQG SQHUW	SQG SQHUW

*These WAARNG facilities are permanently located on Federal Installations, and as of the date indicated by the asterisk, are managed under the Federal Installation's EPA ID number for waste generation.

**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

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 Dangerous Waste 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 dangerous waste 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 dangerous waste 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 hazardous waste 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 MSDS, 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 hazardous materials are considered hazardous chemicals, but not all hazardous chemicals are hazardous materials. Defined by the U.S. Department of Transportation (DOT), it is anything that due to its chemical, physical or biological nature causes safety, public health or environmental concerns. Hazardous materials include hazardous waste 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 MSDS for chemicals procured through military supply channels.

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

- 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 hazardous materials or prepare them for shipment and/or persons responsible for hazardous materials transportation safety or who operate a vehicle used to transport hazardous materials.

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

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

Material Safety Data Sheet (MSDS) - A collection of information required by the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard. A MSDS 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 hazardous waste per month and does not accumulate more than 13,200 pounds of hazardous waste at any one time. An MQG may accumulate hazardous waste for no more than 180 days from the Accumulation Start Date. MQGs located more than 200 miles from a hazardous waste Treatment, Storage, and Disposal Facility (TSDF) may accumulate hazardous waste for no more than 270 days from the Accumulation Start Date.

Personal Protective Equipment (PPE) - Any protective clothing or device worn by the employee to prevent contact with, and exposure to, hazardous materials

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 hazardous waste 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 hazardous waste
- Accumulate no more than 1000 kg [2200 lb] of hazardous waste 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 dangerous waste that is solid only (nonliquid, nonaqueous, nongaseous), that is: Corrosive waste (WAC 173-303-90 (6)(b)(ii)), toxic waste that has Category D toxicity (WAC 173-303100(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 hazardous waste 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 hazardous waste 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
AO	Administrative Officer
AR	Army Regulation
ARNG-ILE	Army National Guard Environmental Programs Division
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
DRMO	Defense Reutilization Marketing Office
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
FM	Field Manual
FMS	Facility Maintenance Shop
HAZMAT	Hazardous Materials
HAZWOPER	Hazardous Waste Operations and Emergency Response
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
MSDS	Material 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
UECO	Unit Environmental Compliance Officer
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
XO	Executive Officer
XQG	No regulated waste generated
YTC	Yakima Training Center

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