

Appendix G

Hazardous Material Management

G-1. Purpose. This appendix outlines policy, establishes responsibilities, and provides operating guidance to meet federal, state, and Army requirements for hazardous material management.

G-2. Definition of hazardous materials.

a. As used in this regulation, the term “hazardous material” (HM) is a serviceable product which requires special management because in a particular form or quantity it has hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) that may pose a risk to human health or the environment. A HM is not a hazardous waste (HW), and the regulatory requirements for the management of each are not the same. HMs become HW or Non-Hazardous Waste (NHW) when they can no longer be used for the intended purpose and must be discarded for disposal. HMs designated for disposal must be managed as HW or NHW. See Appendix H, *Hazardous Waste Management*, this regulation, for management of HW and NHW.

b. HMs are used in many processes that are essential for daily mission activities at Fort Eustis and Fort Story. These HMs will be managed in accordance with (IAW) the requirements provided or referenced in this appendix.

c. The management of HM is an integral part of the Fort Eustis and Fort Story Pollution Prevention Program and compliance with the provisions of the Emergency Planning and Community Right To Know Act (EPCRA). The requirements of this chapter are consistent with and support the pollution prevention actions described in Appendix Q, *Pollution Prevention and Sustainability*, of this regulation.

G-3. Key regulations, orders, and laws.

a. Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, and AR 710-2, *Supply Policy below the Wholesale Level*, both require the establishment of a Hazardous Material Management Program.

b. DA Pamphlet 200-1, *Environmental Protection and Enhancement*, provides technical and procedural information, and further defines policy and responsibilities as directed by AR 200-1.

c. Technical Manual 38-410, *Storage and Handling Hazardous Material*, provides guidance for daily operations.

d. DOD Regulation 4160.21M, *Defense Reutilization and Marketing (DRMO) Manual*, outlines procedures for procurement of hazardous materials for DOD activities.

e. DOD Regulation 4145.19-R-1, *Storage and Material Handling*, identifies proper storage and material handling for DOD activities.

f. OSHA Code of Federal Regulations (CFR), Title 29 CFR 1910.1200, identifies the federal standards for Hazard Communication including proper labeling of hazardous materials.

g. OSHA Title 29 CFR 1910.120 provides the training requirements for handling hazardous materials.

h. OSHA Title 29 CFR 1910.176-1910.181, 1910.184, and 29 CFR 1911 encompass the regulations for proper handling and storage of hazardous materials.

i. EPCRA Title 40 CFR 355 provides information and the list of extremely hazardous substances (EHSs) for reporting to comply with provisions of the Planning and Community Right-To-Know Act (EPCRA).

j. EPCRA Title 40 CFR 370 provides information for the Emergency and Hazardous Chemical Inventory (also referred to as the Tier Two report).

k. EPCRA Title 40 CFR 372 provides information and the list of reportable chemicals and thresholds for the Toxic Chemical Release Inventory (TRI) Report.

l. CAA Title 40 CFR 68 provides information for compliance with Section 112(r) (Accidental Release Prevention) of the Clean Air Act Amendments.

m. Executive Order 13148, *Greening the Government through Leadership in Environmental Management*, directs Federal agencies to ensure all necessary actions are taken to integrate environmental accountability into agency day-to-day decision making and long-term planning processes, across agency missions, activities, and functions.

n. The Emergency Planning and Community Right-To-Know Act (EPCRA) of 1986 directs reporting of hazardous materials on the Toxic Chemical Release Inventory (TRI) Report and the Emergency and Hazardous Chemical Inventory (also referred to as the Tier Two report).

o. The Clean Air Act Amendments, Section 112(r) (Accidental Release Prevention) directs organizations to develop procedures and take actions to prevent accidental releases of hazardous materials.

G-4. General.

a. All activities are required to maintain accountability for and document the flow of hazardous materials from the point of receipt to the point of turn-in for disposal. This includes quantities returned to the supply system, HazMart, used or consumed, released to the environment and/or disposed.

b. All Commands down to battalion or separate company/detachments, and Directorates down to division level will appoint and train one primary and one alternate Activity Environmental Coordinator (AEC) to be the Hazardous Materials Manager/Supervisor for their unit/activity, IAW Chapter 2-7 of this regulation.

c. Material Safety Data Sheet (MSDS) management is the responsibility of tenant activities that store or use hazardous materials. These documents should be organized and updated periodically, and should be available to all personnel who handle hazardous materials. The HazMart issues material safety data sheets to customers when receiving a hazardous material that is new to the Hazmart or if the MSDS was requested by the customer. Other sources for MSDSs include calling the manufacturer of the product and the Hazardous Materials Information Resource System (HMIRS) at www.dlis.dla.mil/hmirs.

d. Personnel who handle or use hazardous materials must be trained IAW Appendix C, *Training Requirements*, of this regulation.

G-5. Acquisition of hazardous materials.

a. The HazMart will effectively manage hazardous materials by reducing the acquisition of hazardous materials and reducing the amount of waste generated. Added benefits include better health and safety practices and better regulatory compliance. Environmentally Preferable Products, i.e., less hazardous, will be chosen when possible.

b. HazMart Customers: The HazMart provides centralized acquisition, storage, distribution, and management of hazardous materials utilized by base operations and tenants working within the fence lines of both installations.

(1) All hazardous materials must be purchased from the FE HazMart or the Naval Amphibious Base (NAB) HazMin Center/Little Creek for Fort Story activities, IAW Chapter 2-9c of this regulation. Activities may not use credit cards or GSA accounts to purchase hazardous materials, unless the materials appear on the exemption list. Copies of the FE & FS USATC *HazMart Informational Handbook* maybe obtained from the FE HazMart, Bldg 1205.

(2) All activities will maintain an accurate and up to date Authorized Use List (AUL) with the HazMart. Activities will update the AUL at least annually.

(3) Activities are only allowed to keep a 7-day supply of HMs on-hand. HMs not on the activity's Authorized Use List (AUL) will be ordered through the HazMart after receiving approval for the new product from the ENRD Hazardous Materials Manager.

(4) Activity Deployment. The HazMart will not keep a continual "deployment stock" on hand in case of deployments. For an actual deployment, units are required to notify the HazMart as soon as possible of all HMs the unit will need for that deployment. To allow time for the HazMart to obtain any HMs they do not stock that are needed for deployment, units should tell the HazMart their needs, items and quantities, NLT two weeks before the HMs are needed by the unit.

(5) Activity Redeployment. Upon redeployment, HMs purchased from other sources must be reported to the ENRD Hazardous Materials Manager including an MSDS and total quantity on hand for each product.

(6) Pesticides. Units on Fort Eustis and Fort Story are prohibited from obtaining or using pesticides. The only activities authorized to obtain and use pesticides is Fort Eustis DPW and the Navy PWC for Fort Story. If personnel from DPW or PWC want to obtain new pesticides, the order must be approved by both the ENRD Hazardous Materials Manager and the Installation Pest Control Coordinator before ordering the new pesticides through Hazmart. All other units will request pesticide application through the DPW Service Order Desk. See Appendix U, *Pesticides*, of this regulation for further information.

G-6. Hazardous material identification. It is essential that hazardous materials are accurately identified to insure safe storage, handling and disposal. Title 29 CFR 1910.1200 provides the requirements for proper labeling of hazardous materials.

G-7. Transportation.

a. Transportation of HMs is highly regulated by DOT and must meet stringent requirements. DOL, Transportation Division should be contacted for additional on-post and off-post transportation requirements.

b. On-Post transportation must meet the following requirements:

(1) Only government approved or licensed contractor vehicles should be used. HazMart will not issue HMs to personnel in POVs.

(2) Vehicles will have fire extinguishers appropriate for the type of materials being moved.

(3) If containers have free liquids, then a spill kit will be carried.

(4) Containers will be secured to prevent movement of containers or spills.

G-8. Storage. Storage of HMs including management of HM storage sites will be conducted IAW Appendices I, *Container Management*, and K, *Storage and Accumulation Site Management*.

G-9. Handling and use.

a. Before handling or using any hazardous material, always check the label and/or MSDS, which identifies contents, hazards, and precautions.

b. Technical Manual: The Joint Service “Storage and Handling of Hazardous Material Manual,” dated 13 January 1999, is an essential reference for those responsible for the proper storage and handling of a wide range of hazardous materials within the government. The manual (TM 38-410) is available in Portable Document Format (pdf) from the Hazardous Technical Information Services (HTIS) web site at <http://www.dscr.dla.mil/htis/htis.htm>. The document is also available via a link to the HTIS web site from your service component sector on the Defense Environmental Network & Information Exchange (DENIX) web site at <http://www.denix.osd.mil/denix/Public/Policy/policy.html>.

G-10. Inventory and reporting.

a. Hazardous material inventory data collection. Data concerning hazardous material inventories is collected from the HazMart and activities each quarter based on a calendar year. This data represents documentation required to meet the installations’ compliance with the Emergency Planning and Community Right to Know Act (EPCRA). See Tab 1 of this Appendix for HazMart, activity, and installation procedures for hazardous material inventory reporting.

b. EPCRA requires specific reporting requirements. Such requirements include the Emergency and Hazardous Chemical Inventory (Tier Two) and Toxic Chemical Inventory (Form R). The Emergency and Hazardous Chemical Inventory is submitted to the State Emergency Response Council (Virginia Department of Environmental Quality), respective Local Emergency Planning Committees (see Chapter 3 of this regulation) and respective local fire departments. The Form R is submitted to the Environmental Protection Agency Region Three and the Virginia Department of Environmental Quality. The Tier Two report provides information to emergency planners and responders in the event of a chemical accident. The Form R report provides information concerning releases of hazardous materials as a result of use of certain toxic chemicals. Such information includes quantities and types of pollutants released into media (air, land and water) and transferred off site as waste. Both reports become public record. Hazardous material inventory data is used to meet these requirements.

c. Section 112(r) of the Clean Air Act Amendments require that Risk Management Programs and Risk Management Plans be prepared and implemented if the regulated substances are stored or used above the respective regulatory quantity or other regulatory criteria is met. Additionally, Fort Eustis and Fort Story are subject to the General Duty Clause of Section 112(r) of the Clean Air Act Amendments. This states that all handlers and users of any hazardous substance must identify associated hazards, design safe facility operations, prevent releases, and minimize consequences of releases.

d. Hazardous material inventory data collection also serves as an audit trail for risk management, waste minimization, identification of less toxic substitutes, cost-saving measures and various other pollution prevention activities.

G-11. Hazardous material inspections. Accident prevention surveys and inspections and sound operating procedures are among the principal elements of a total safety and health program. In addition to these inspections, organizations are subject to both announced and unannounced inspections conducted by state and federal agencies under authority of the Federal Facilities Compliance Act (FFCA), Title 29 CFR and 40 CFR. Appendix J, *Inspections*, of this regulation contains HM inspection information.

G-12. Disposition.

a. Disposition of HMs does not necessarily imply disposal, which is a waste operation.

(1) HMs no longer needed for the original process may be reused for another process.

(2) HMs may be returned to the Hazmart for restocking. The Hazmart will make a determination based on several factors, for example: condition, date, demand, etc., to determine if the HMs can be re-stocked.

(3) In a limited number of cases, HMs may be recycled.

b. HMs may have to be “wasted out” as Hazardous Wastes or a Non-Hazardous Wastes.

G-13. Training. Federal, State, and Army regulations require that individuals who perform functions associated with the storage or use of HM or with the management of HW be trained for the functions performed. The design and conduct of personnel training programs can reduce serious injury and provide for environmental protection. Appendix C, *Training Requirements*, addresses environmental training requirements for all personnel that use, store, or handle HMs.