

JLW

Danzon

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 3/17/86

TO:

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DIR, NAT RESOURCES & ENV. AFFAIRS

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For your file following receipt

~~2. Please initial, or comment, and return all papers to this office.~~

*v/r
Bob A*

3. Your file copy.

“LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE”

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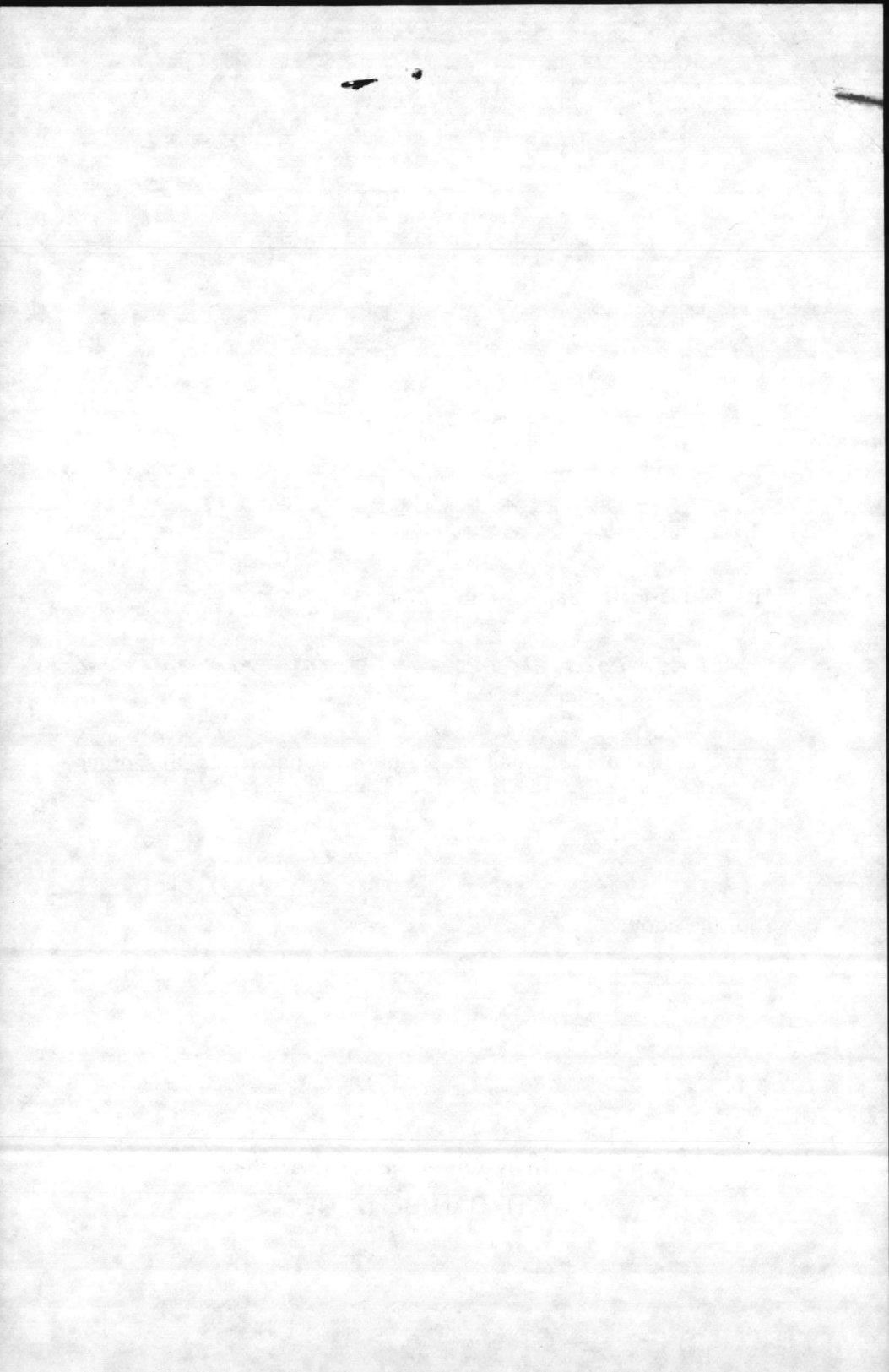
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Bob A*

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“LET’S THINK OF A FEW REASONS
WHY IT CAN BE DONE”



Subj: SOP RELATIVE TO PROCESSING MISIDENTIFIED HAZARDOUS PROPERTY

- Distribution: (Continued)
- NAVRADSTA R Sugar Grove
- NAVORDSTA Louisville
- MARCORB Camp Lejeune ←
- MCAS Cherry Point
- NAVAIREWORKFAC Cherry Point
- MCAS New River
- ABL Cumberland
- NAVSTA Keflavik
- NAVSECGRUACT Edzell
- NAVSECGRUACT Athens
- NAVSECGRUACT Sabana Seca
- NAVCOMMSTA Balboa
- NAVSTA Roosevelt Roads
- NAVSTA Panama Canal
- NAVSTA Rota
- NAVSTA Guantanamo
- NAVSUPPACT Naples
- NAS Sigonella
- NAVSUPPO La Maddalena
- NAVSUPPACT Souda Bay
- NAVCOMMSTA Nea Nakri
- NAF Lajes
- NAS Bermuda
- NAVFAC Argentia
- NAVFAC Antigua
- NAVFAC Brawdy
- NAVSUPPACT Holy Loch
- NAVCOMMSTA UK Thurso

Env Engr *ONE*

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10

11

12

Subj: SOP RELATIVE TO PROCESSING MISIDENTIFIED HAZARDOUS PROPERTY

Distribution: (Continued)

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DEPARTMENT OF THE NAVY

ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

TELEPHONE NO.
(804) 445-2935

IN REPLY REFER TO:
6280
1143SGO

11 MAR 1986

From: Commander, Atlantic Division, Naval Facilities Engineering Command

Subj: SOP RELATIVE TO PROCESSING MISIDENTIFIED HAZARDOUS PROPERTY

Ref: (a) OPNAVINST 5090.1
(b) DOD 4160.21M Chapter 21

Encl: (1) DRMS Battle Creek ltr DRMS-HP of 8 Oct 85

1. Enclosure (1) has been provided to local Defense Reutilization and Marketing Offices (DRMOs) to establish operational procedures for processing misidentified Hazardous Property from DOD components. This guidance is therefore forwarded to assist Activities attempting to turn in Hazardous Materials/Hazardous Waste (HM/HW) through local DRMOs.

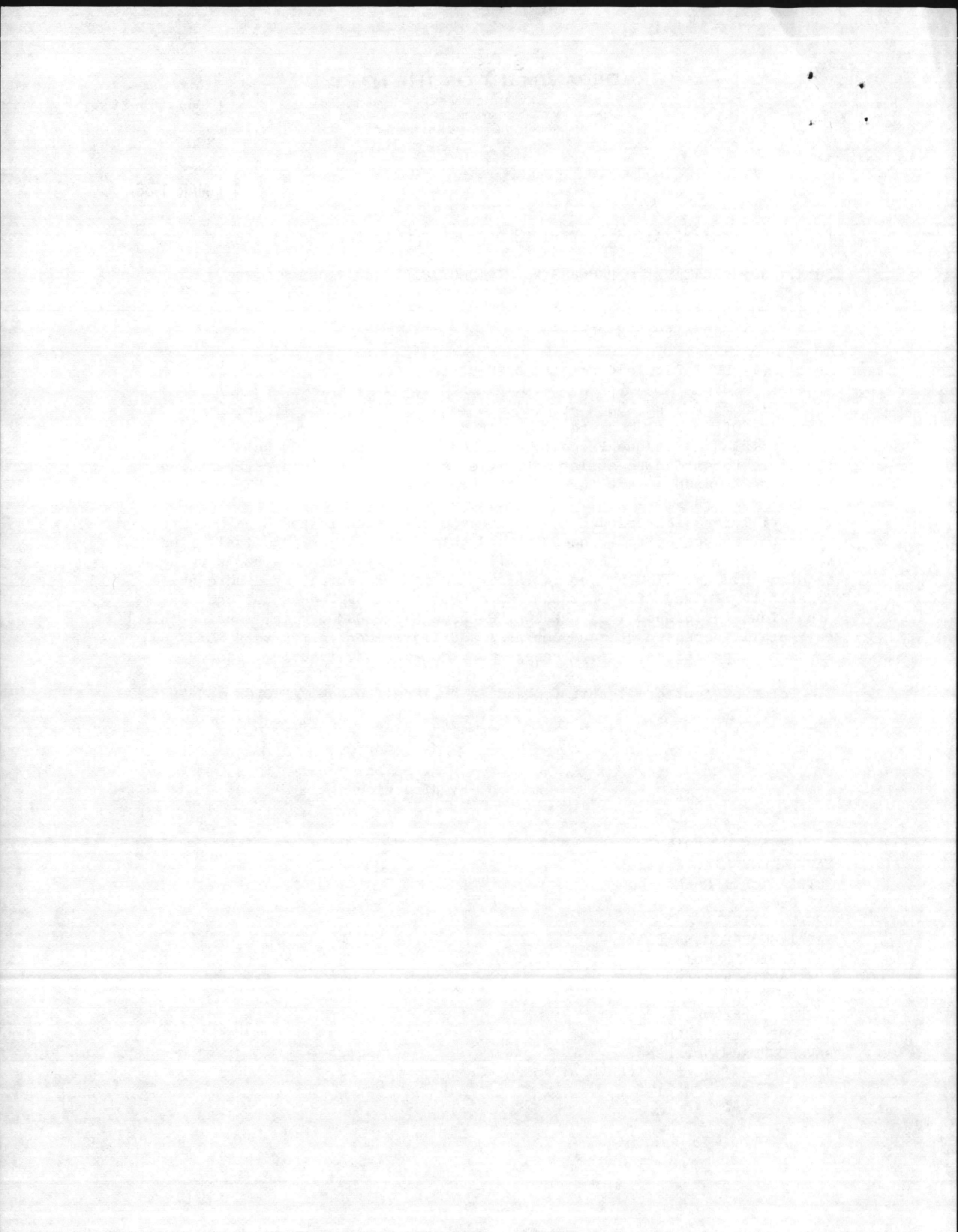
2. Activities are reminded however that every attempt should be made to meet the requirements of references (a) and (b) to the extent practical prior to attempting to turn in. Enclosure (1) specifically addresses HM/HW turn-in requirements and DRMO procedures for rejecting or correcting discrepancies related to misidentified hazardous property. This SOP does not contain provisions for disposal of unknown HW through the DRMO. Implementing this SOP may entail increased command emphasis and improvement of current HM/HW management practices, i.e., segregation, collection, labeling, etc.

3. Point of contact at this Command is Mr. Steve Olson, AUTOVON 565-2935.

J. R. Bailey
J. R. BAILEY
By direction

Distribution:

COMNAVBASE Norfolk
NAVPHIBASE Little Creek
FCTCLANT Dam Neck
NAS Oceana
PWC Norfolk
NAVAIREWORKFAC Norfolk
NAVSHIPYD Norfolk
AFXTRACTY Camp Peary
NSC Norfolk
WPNSTA Yorktown
NAVHOSP Portsmouth
NAVSECGRUACT Northwest
NAVCAMS LANT Norfolk (NAVRADTRANSFAC Driver)





DEFENSE LOGISTICS AGENCY
DEFENSE PROPERTY DISPOSAL SERVICE
FEDERAL CENTER
BATTLE CREEK, MICHIGAN 49016

OCT 08 1985

IN REPLY
REFER TO DRMS-HP (D. Severson/(AV)369-6977/wkh)

SUBJECT: SOP Relative to Processing Mis-Identified Hazardous Property

TO: DRMR-Columbus DRMR-Ogden
DRMR-Europe DRMR-Pacific
DRMR-Memphis 80-5 Group (See Distribution)

1. Enclosed for immediate implementation is the recently developed SOP that sets forth the DRMS procedure governing the processing of mis-identified hazardous property. This SOP affords the user the ability to provide a timely response to the majority of the mis-identified hazardous property situations the DRMO encounters. Your cooperation in the implementation of this SOP and development of additions/changes thereto will be appreciated.

2. It should be recognized that this SOP does not address individual state and local government requirements. Therefore, the individual DRMRs are responsible for assuring the SOP is responsive to and not in conflict with their specific directives. If conflicts develop, the DRMRs shall resolve these conflicts and inform DRMS of their actions. If the problems cannot be resolved at the DRMR level, the problem will be elevated to DRMS for resolution. The attached SOP will be incorporated into the DRMS regulatory guidance.

3. DRMS point of contact on this subject is Don Severson, AUTOVON 369-6977.

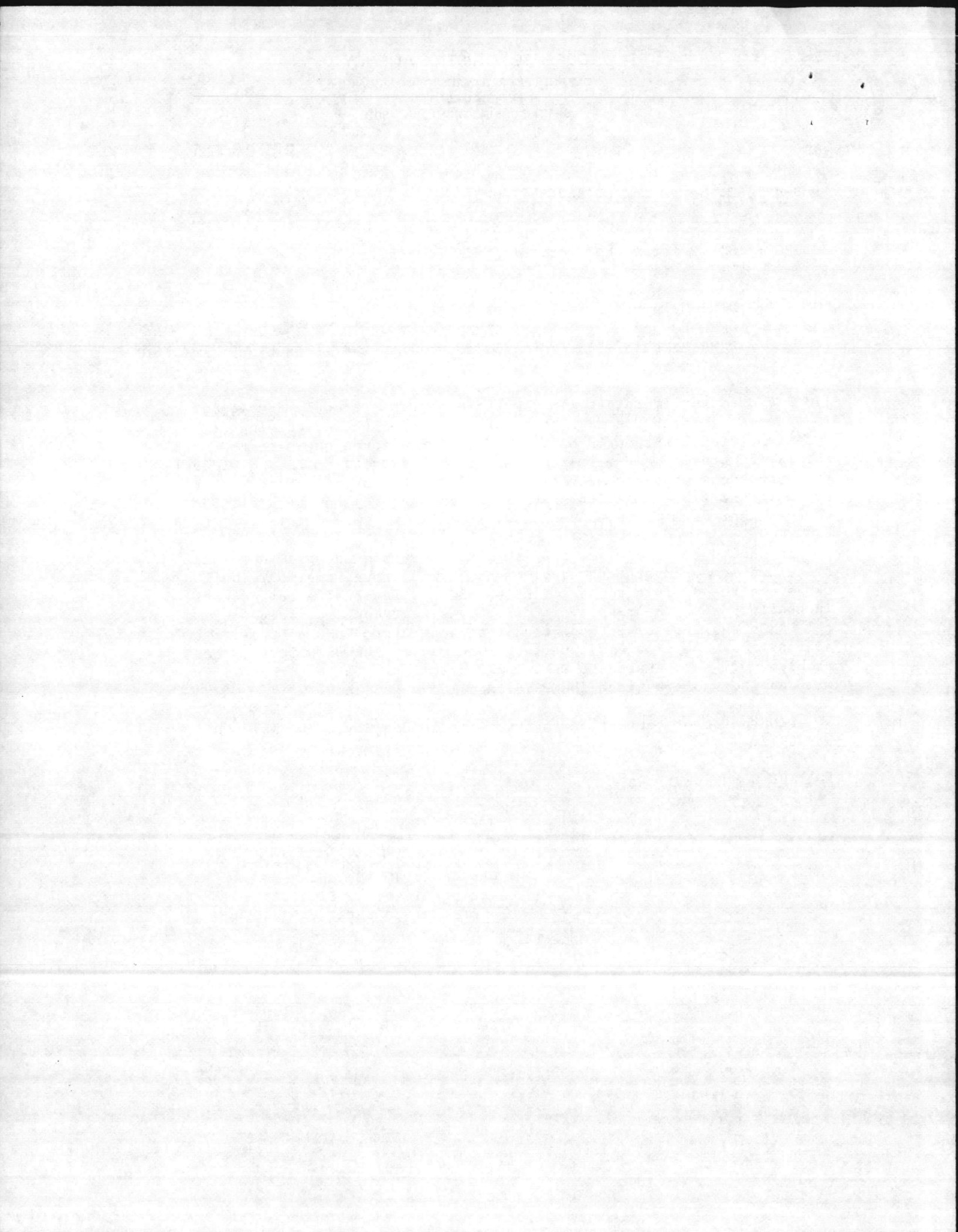
FOR THE COMMANDER:

1 Encl

for

GEORGE M. JONAS, JR.
Acting Director, Directorate
of Environmental Protection

Encl (1)



DISTRIBUTION

Director
Defense Logistics Agency
ATTN: Technical and Logistics Service
Property Utilization and Disposal Division
(DLA-SME Paula McLain) (info only)

Director
Defense Logistics Agency
ATTN: Executive Directorate Supply Operations
Depot Operations Division (DLA-OW John Frick)

Deputy Chief of Staff for Logistics
ATTN: DALO-SMP-U (Mary Jackson)
Pentagon, Room 1D573
Washington, D.C. 20310

USA Material Development and Readiness Command
ATTN: DRCSM-PS
5001 Eisenhower Avenue
Alexandria, VA 22333

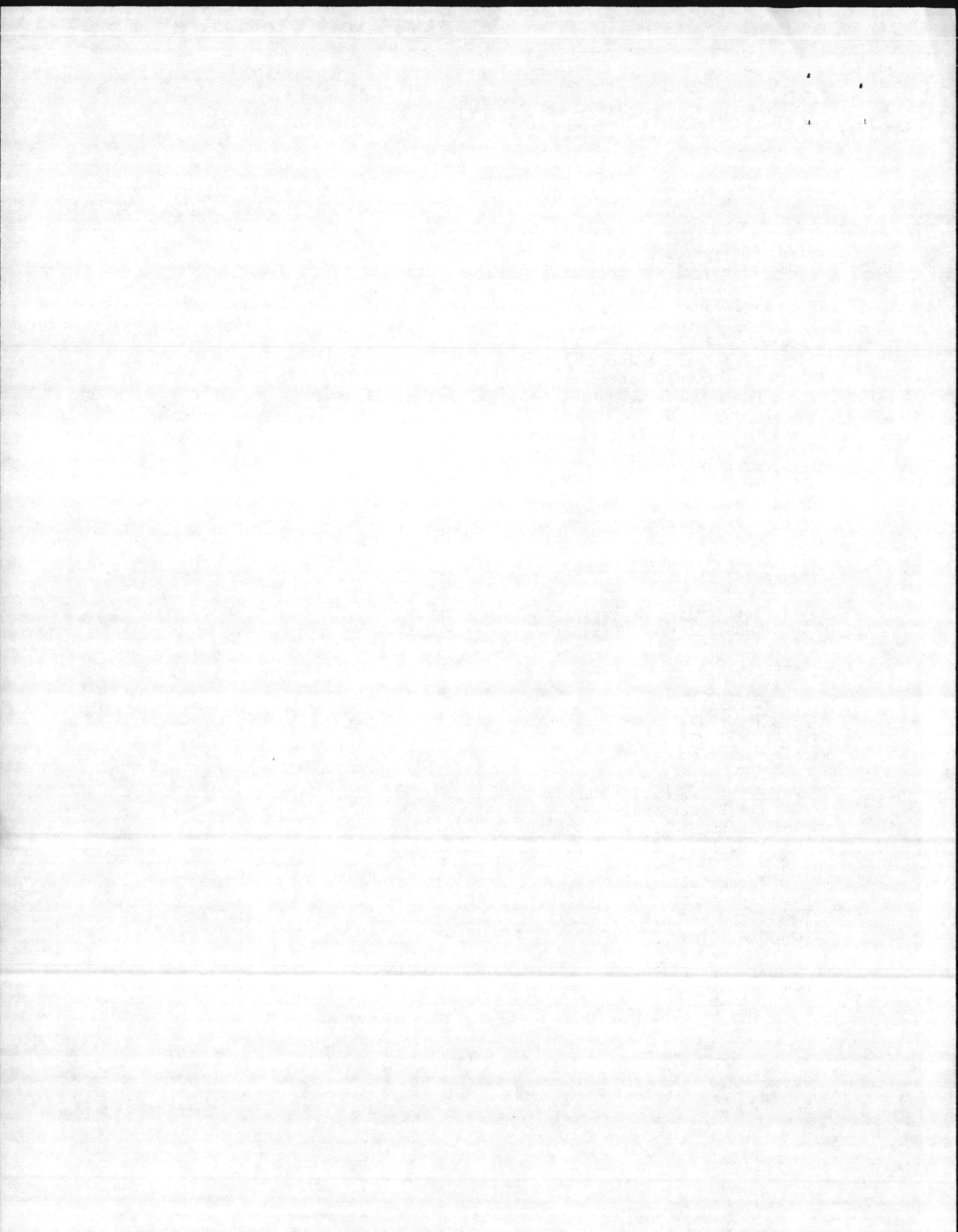
Naval Facilities Engineering Command
ATTN: CODE 112 (Ted Zagrobelny) ←
200 Stovall
Alexandria, VA 22332

Naval Supply System Command
ATTN: CODE 0322 (John Dickhute)
Crystal Mall Bldg. 3
Washington, D.C. 20376

HQ United States Marine Corps
ATTN: LMM-2 (Rose Massey)
Common Wealth Bldg., Room 358
Washington, D.C. 20380

HQ Air Force Logistics Command
ATTN: AFLC-MMLII (Larry Kildow)
Wright-Patterson AFB
Dayton, OH 45433

HQ Department of Army
ATTN: DAEW-ZCE (Kathleen O'Halloran)
Washington, D.C. 20310-2600



STANDARD OPERATING PROCEDURE

(Prescribing Authority: DPDS-R 5025.1)

DATE
Oct 85

NUMBER

TITLE

Processing Mis-Identified Hazardous Property

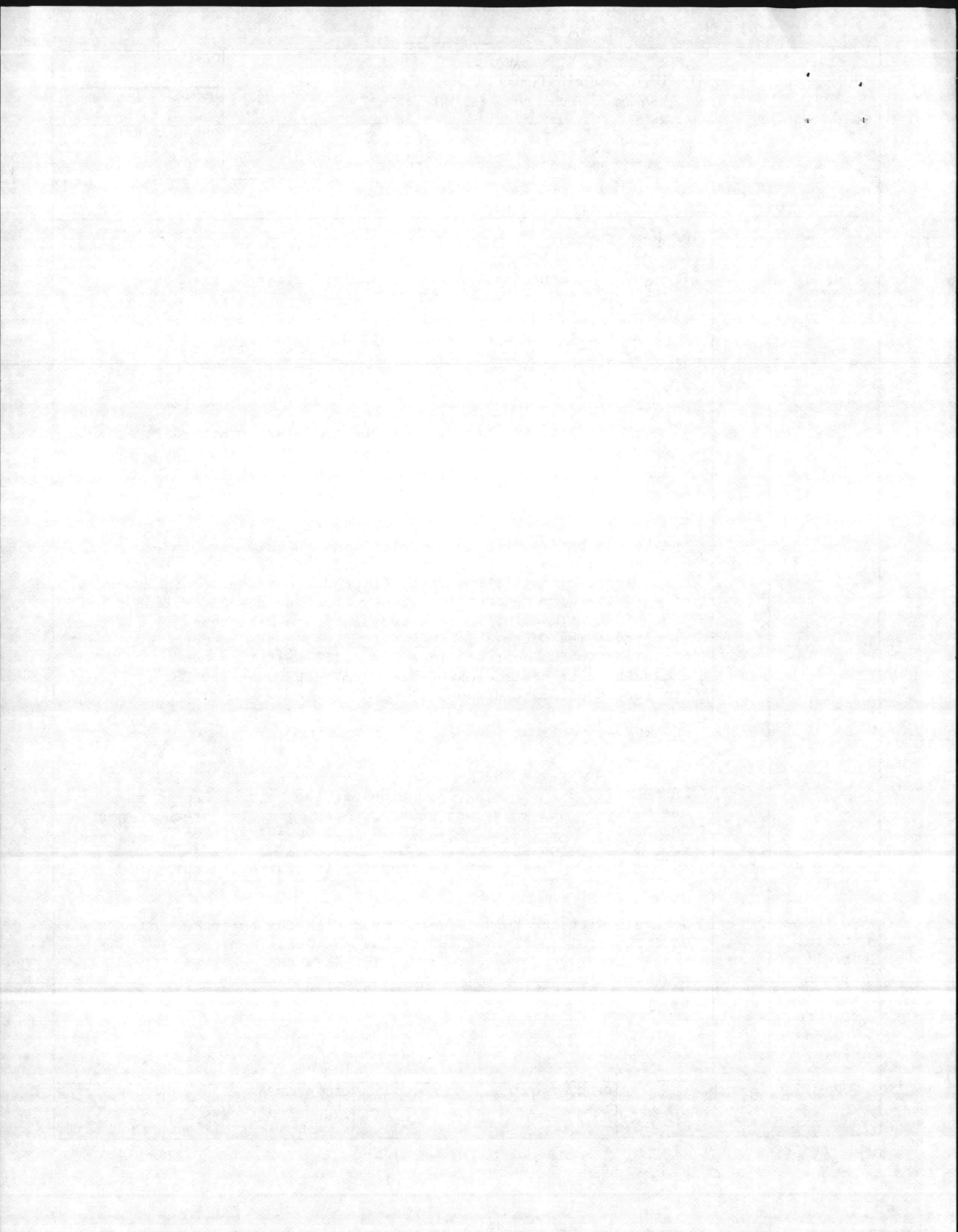
ORGANIZATION

RESPONSIBILITY	STEP	ACTION
		<p>GENERAL COMMENT</p> <p>The guidance contained in this Standard Operating Procedure is provided for in: 40 and 49 CFRs (applicable parts); DEQPPM 80-5, 80-8 and 80-9; DoD 4160.21-M, Chapter XXI; DPDS-M 6050.1; and applicable state and local laws and regulations.</p> <p>NOTE:</p> <ol style="list-style-type: none"> 1. DoD regulations which govern the transfer of hazardous property require the generator to properly identify the property. If proper identification of such wastes is not provided, the DRMO/OSB must refuse acceptance. 2. It is the Government's desire that the hazardous property in the disposal contractor's possession quickly move to ultimate disposal. The contractor, therefore, is required to immediately notify the Contracting Officer Representative of any situation that will delay or preclude the accomplishment of the timely ultimate disposal of the hazardous property. The Contracting Officer, through the latitude contained in the contract language, will negotiate, on a case-by-case basis, actions to permit the property to proceed to ultimate disposal. <p>PRE-TURN-IN ACTION</p> <p>NOTE: Pre-turn-in inspections may be accomplished pursuant to DRMS-M 4160.3, Receiving Operations at the Defense Reutilization and Marketing Offices, Enclosure 2, Step 1; e.g., Pre-coordination for hazardous property may require on-site inspection.</p>
Turn-In Activity	1.	Inform the DRMO of hazardous property it desires to turn-in.
DRMO/Environmental Specialist/Environmental Monitor/or Designated Representative	2.	Schedule with the turn-in activity a time for the DRMO Environmental Specialist and/or Environmental Monitor Representative to visit on a timely basis the generator (turn-in site) and inspect the property intended for turn-in.

ORIGINATOR
Donald Severson *Donald Severson*

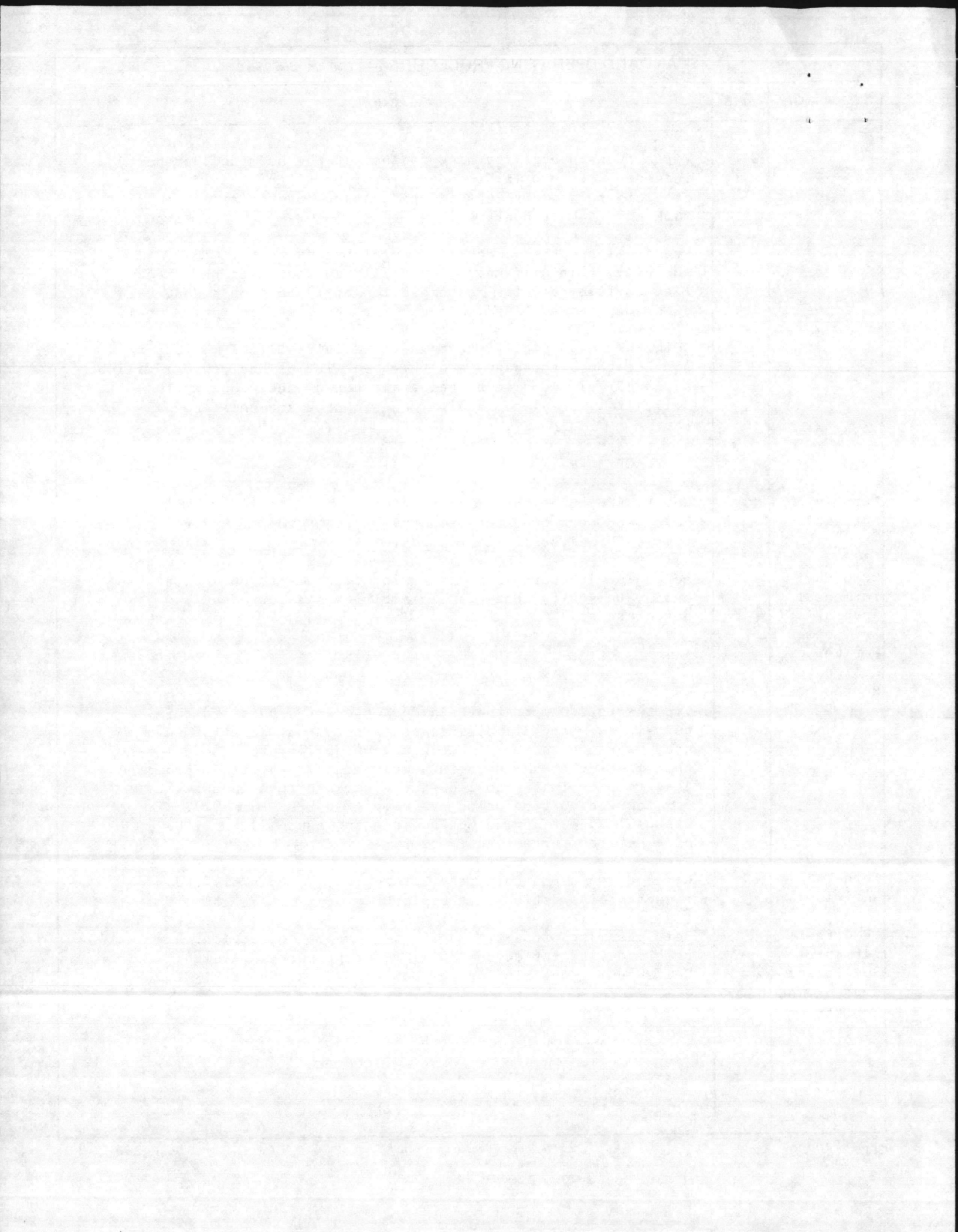
DPDR APPROVAL

DPDS APPROVAL
GEORGE M. JONAS, JR. *George M. Jonas, Jr.*



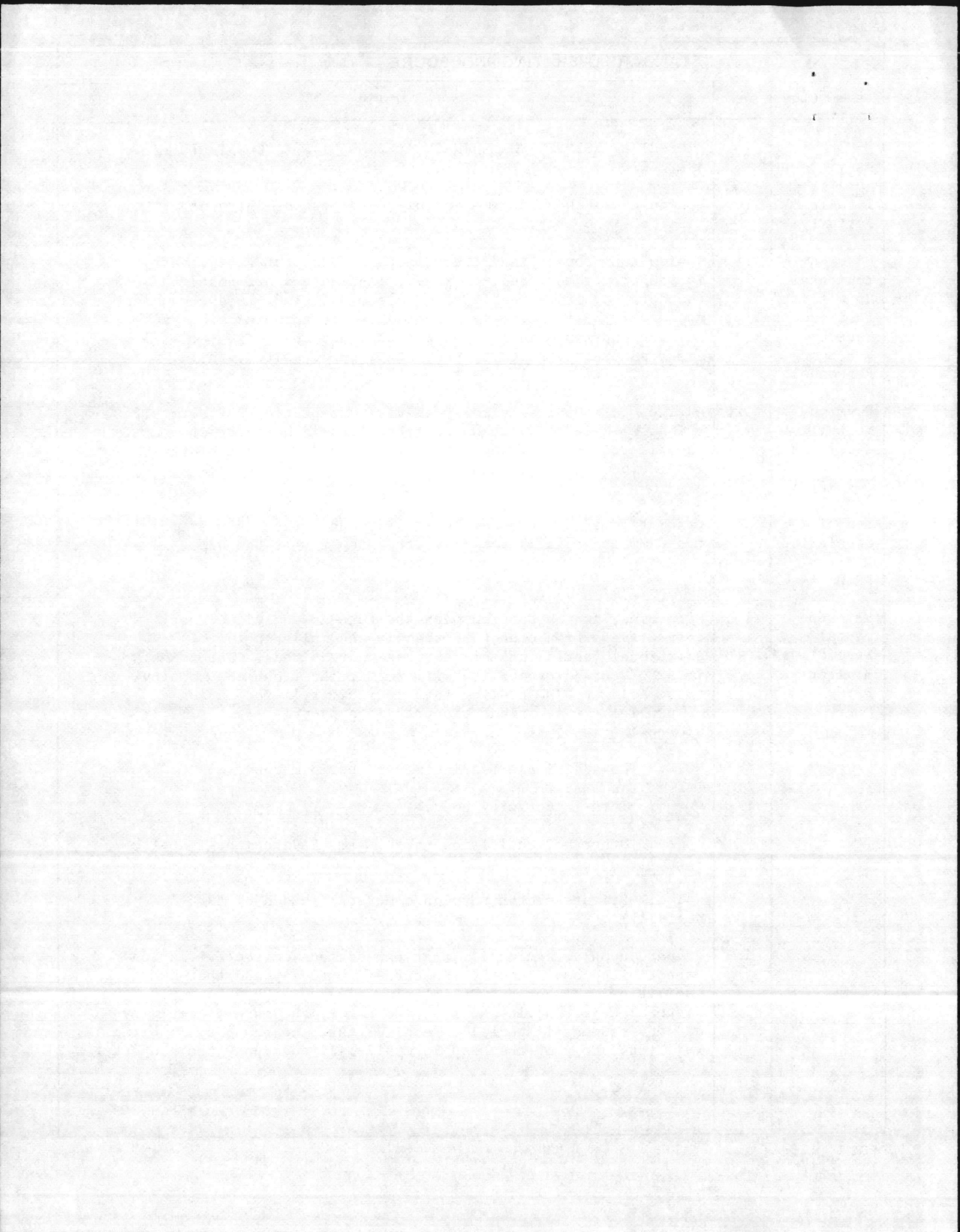
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
	3.	Visit turn-in activity site to inspect the hazardous property intended for turn-in; inspect the property and record any problems relative to the identification, packaging or marking of the property.
	4.	<p>Prepare inspection checklist, furnish copy to turn-in activity, file original in hold file and annotate the checklist on file relative to completion of inspection and number of discrepancies found. Inspection checklist at Enclosure 1.</p> <p>NOTE: When possible, the turn-in activity will immediately correct the discrepancy and the checklist of Enclosure 1 will be so noted. If no discrepancies are noted, the property will, if an in-place receipt, be accepted and receipted for.</p> <p>IN PLACE TURN-IN</p>
Turn-In Activity	5.	Notify DRMO that the discrepancies identified in 3 above have been corrected and property is ready for transfer to the DRMO accountable records.
DRMO/Environmental Specialist/Environmental Monitor or Designated Representative	6.	Schedule with turn-in activity for site visit, on a timely basis, to verify that turn-in activity has corrected deficiencies.
	7.	Visit site, inspect the hazardous property scheduled for turn-in assuring all discrepancies noted on report of 4 above were corrected. Accept accountability for the property that meets the DRMS turn-in requirements. Refer any property that remains in a troubled status back to turn-in activity for correction/resolution. A completed DPDS Form 917, Disposal Reject/Advice Notice (see Enclosure 2), will be provided the turn-in activity.
Turn-In Activity	8.	Correct, when possible, the discrepancy immediately and request reinspection of the property.
DRMO/Environmental Specialist/Environmental Monitor or Designated Representative	9.	Reinspect the property and if on-the-spot corrections have been made, accept accountability for property. Assign DoT shipping description per DoD 4160.21-M, Chapter XXI.



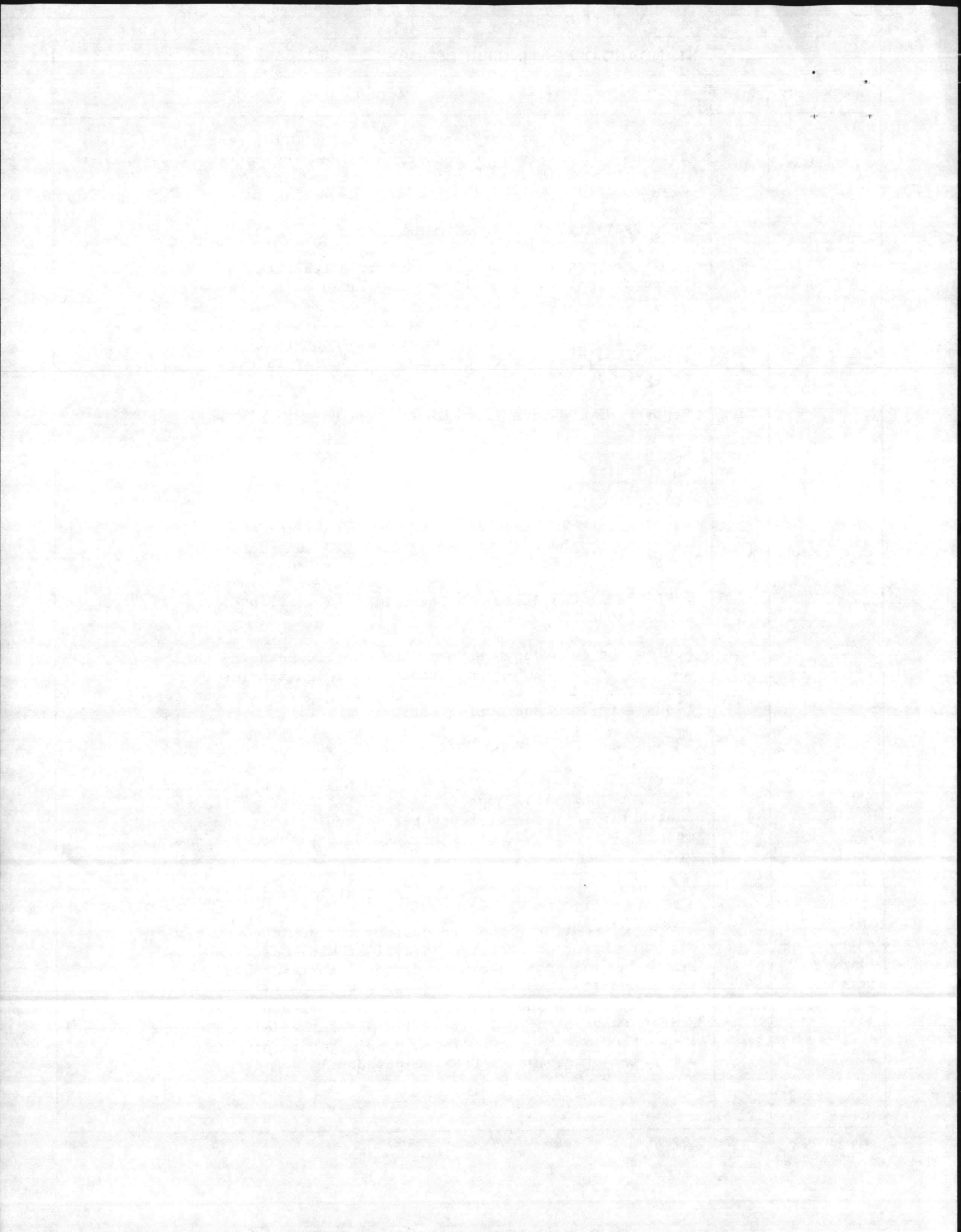
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
		PROPERTY PRESENTED FOR TURN-IN AT DRMO SITE (ACCOUNTABILITY AND CUSTODY)
Turn-In Activity	10.	Schedule with DRMO a time and place for the delivery of hazardous property.
DRMO/Environmental Specialist/Environmental Monitor/Receiving Personnel	11.	Review the property and the DTID to assure that the property is properly identified, packaged, labeled and off-post receipts requiring manifesting, are manifested. Discrepancies noted will be immediately reported to the turn-in activity's environmental specialist/monitor and host environmentalist if discrepancy originates on property from off-site turn-in.
Environmental Specialist/Monitor	12.	Advise, telephonically followed via a completed DPDS Form 917 (Disposal Reject/Advice Notice) the turn-in activity of the discrepancy and, where feasible, coordinate immediate resolution of the problem.
Environmental Specialist/Monitor/DRMO	13.	Hold, if DRMO facilities will permit and if short term resolution of the problem is evident and agreed upon by the DRMO and turn-in activity, the property at the DRMO.
Environmental Specialist/Monitor/DRMO	14.	<p>Determine, in conjunction with the turn-in activity, that corrective action cannot be readily accomplished (e.g., additional testing and/or repackaging required). Determine if DRMO storage capability will permit the troubled property to be held at DRMO pending turn-in activity's resolution of problem, if so, place property in appropriate interim storage.</p> <p>NOTE: The additional testing may be performed by:</p> <ul style="list-style-type: none"> a. Turn-in activity/host. b. Other DoD activities (e.g., Army Environmental Health Agency). c. Private sector through contract (funded by turn-in activity).
	15.	Prepare, upon determination that expeditious corrective action cannot be accomplished by the turn-in activity and that DRMO facilities will not permit interim storage, a DPDS Form 917, Disposal Reject/Advice Notice, and notify the turn-in activity and environmental specialist/monitor that the property is being rejected. Copy of the DPDS Form 917 will accompany the property.



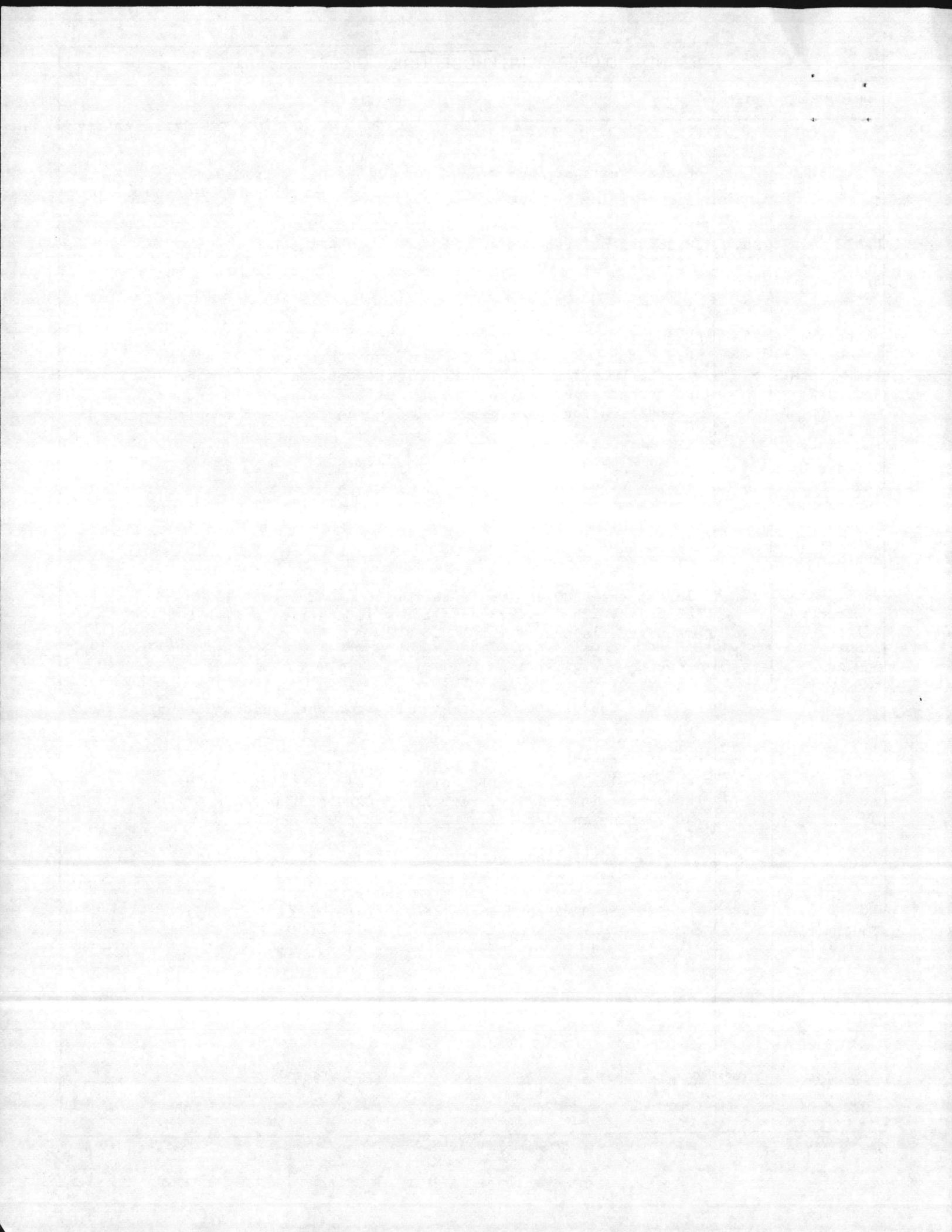
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
DRMO/Environmental Specialist/Monitor/COR	16.	Accept, through proper annotation of the DTID, accountability and physical custody of hazardous property reflected in 11 through 15 above that is determined acceptable for turn-in.
		DRMO PREPARATION OF DPDS FORM 1669, DELIVERY ORDER REQUEST
	17.	Visit the storage site and visually inspect the hazardous property that is scheduled to be placed on the Delivery Order Request to identify any apparent mis-identification (e.g., content listed as liquid when it is a solid, listed as a full drum when the drum is less than full, damaged containers, leaking containers, improperly labeled or marked property.)
	18.	Report the mis-identification to the turn-in activity.
	19.	Coordinate with the turn-in activity action to correct the problem.
DRMR Operations Environmentalist	20.	Prepare, as required, the DPDS Form 1669; tag the container(s) to indicate it/they have been placed on a 1669 Form and forward the request package to DRMS Contracting Directorate with info copies to DRMR and DRMS-HO.
		DRMR OPERATIONS REVIEW OF THE DPDS FORM 1669, DELIVERY ORDER REQUEST
	21.	Review the info copy of Form 1669 and accompanying data and advise the DRMS-HO of suspected irregularities and recommended corrections. DRMS-HO will coordinate the corrections with the Contracting Officer.
DRMS-HO Action Officer/Specialist		DRMS-HO REVIEW OF DPDS FORM 1669, DELIVERY ORDER REQUEST
	22.	Review the info copy of Form 1669 and accompanying data from a technical standpoint, assign CLINS and advise the Contracting Officer of suspected irregularities and recommended corrections to the contract data previously provided DRMS-P.
DRMS-P Contracting Officer/Specialist		DRMS-P RECEIPT AND PROCESSING DELIVERY ORDER REQUEST
	23.	Review of delivery order request by the assigned Contracting Officer and/or Contracting Specialist who, based on general knowledge and past hazardous disposal contract history, will identify suspected irregularities. Coordinate with DRMS-HO, region and DRMO to resolve the irregularities. NOTE: Contracting Officer will process the delivery order request unless he identifies a problem or is notified of a problem by region or DRMS-HO personnel (see steps 21 and 22).



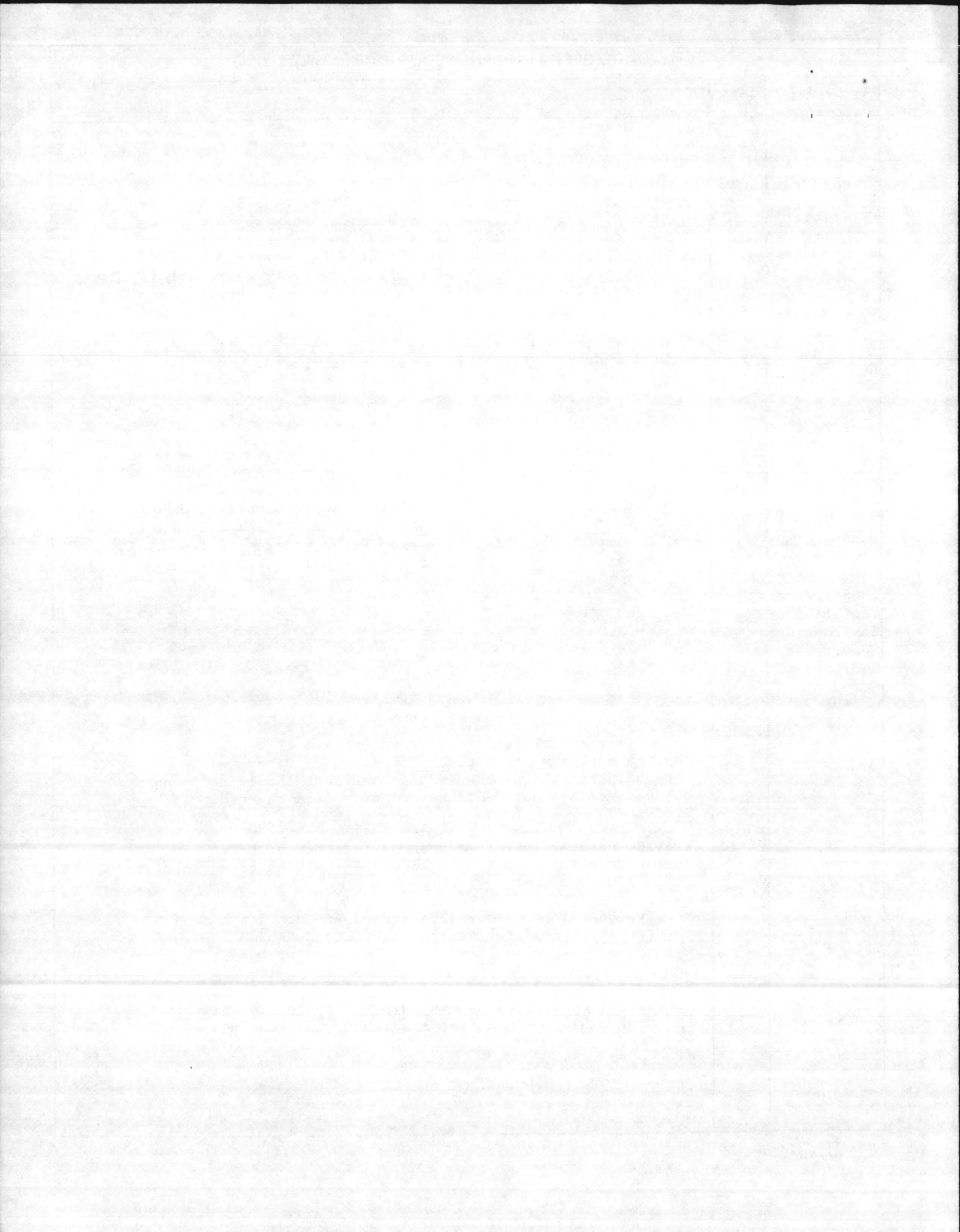
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
	24.	<p>Formulate, process and issue delivery order. Notify contractor of award. Issue DD Form 1155, Delivery Order.</p> <p>CONTRACTOR ACKNOWLEDGES AND ACCEPTS CONTRACT AWARD</p>
<p>DRMS Contractor or Designated Representative</p> <p>Contractor or Designated Representative and DRMS Contracting Officer/ Contracting Officer Rep. and DRMO Environmental Specialist/ Monitor</p>	25.	<p>Receives delivery order issued by DRMS-P Contracting Officer (CO).</p>
<p>DRMS Contracting Officer</p>	26.	<p>Request from contractor for approval to make a pre-pickup visit to storage site. As result of this visit, the contractor may formally request of the Contracting Officer Representative a response to questions relative to property identification, packaging, labeling and manifest requirements.</p>
<p>DRMS-HO Action Officer/ Specialist</p>	27.	<p>Inform the DRMO environmentalist of the contractor's concerns. The environmentalist will coordinate with DRMS-HO required actions.</p>
	28.	<p>DRMS-HO action officer/specialist will:</p> <ul style="list-style-type: none"> a. Coordinate with region Environmental Operations Division to resolve the contractor's concerns. b. Schedule, if the problem(s) cannot be resolved telephonically, a meeting of concerned activities (DRMS, COR, turn-in activity, region and DRMO) for purpose of addressing and resolving the contractor's concerns. c. Advise the Contracting Officer of the resolution action(s).
<p>DRMS-P Contracting Officer</p>	29.	<p>Advise the DRMS contractor of the resolution action(s).</p>



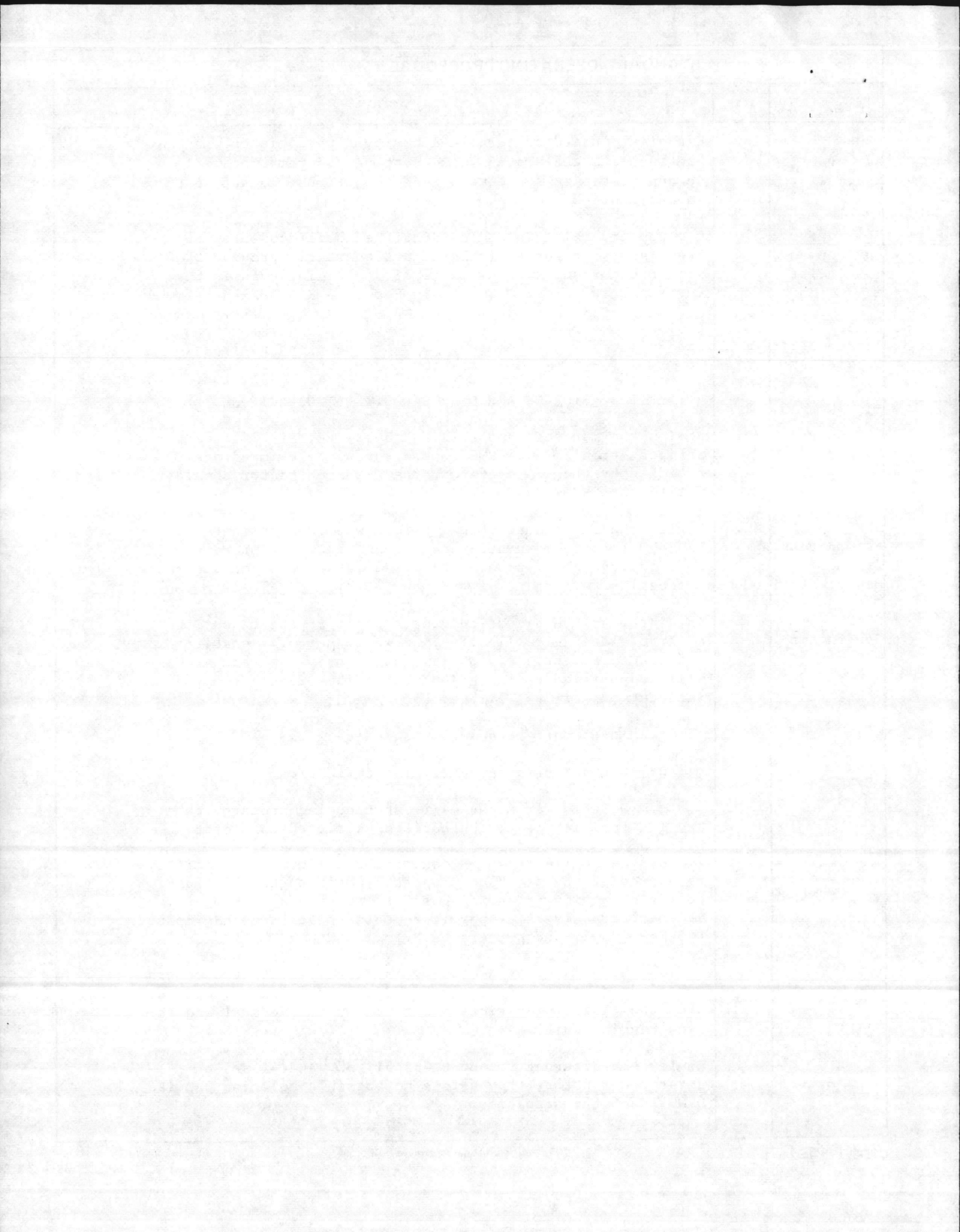
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
DRMS Contractor or Contractor Representative	30.	<p>CONTRACTOR ARRIVAL ON SITE TO CUTOLOAD HAZARDOUS PROPERTY</p> <p>Notification from contractor of intent to question items on the delivery order and contractor's decision to accomplish additional testing or refusal to accept the property will be provided Contracting Officers Representative with the rationale for determining the property to be troubled property. Contractor rationale could include, but is not limited to such as:</p> <ul style="list-style-type: none"> a. Visual observation, e.g., container certification, labels and identification missing or obscured. b. Content tested, e.g., type of test performed and the results of the test. c. Who performed the test and who observed the testing.
DRMS Contracting Officer/ Contracting Officer Representative DRMS Environ- mentalist/DRMO Environmental Specialist/ Monitor/ Turn-In Activity	31.	<p>Conduct review of the suspected troubled property. Contracting Officer/Contracting Officer Representative, DRMR, DRMO and turn-in activity representative will participate as required. When possible, provide immediate resolution of the issue(s) and advise the DRMS contractor accordingly.</p>
	32.	<p>Estimate the time required for resolution of problem and through coordination with the contractor, determine if the delivery/pickup order and/or manifest should be amended to permit out loading of the property less the troubled items.</p>
Contractor or Contractor Representative	33.	<p>Provide Contracting Officer a copy of contractor identification test analysis if the contractor elects to perform identification test.</p>
DRMS Contracting Officer	34.	<p>Receive container test analysis data and provide a copy to Contracting Officer Representative and DRMS-HO.</p>
DRMS-HO Action Ofc Specialist	35.	<p>Schedule, as determined/required or upon turn-in activity request, a meeting with turn-in activity to discuss with the DRMR and/or DRMS-HO the results of the testing.</p>



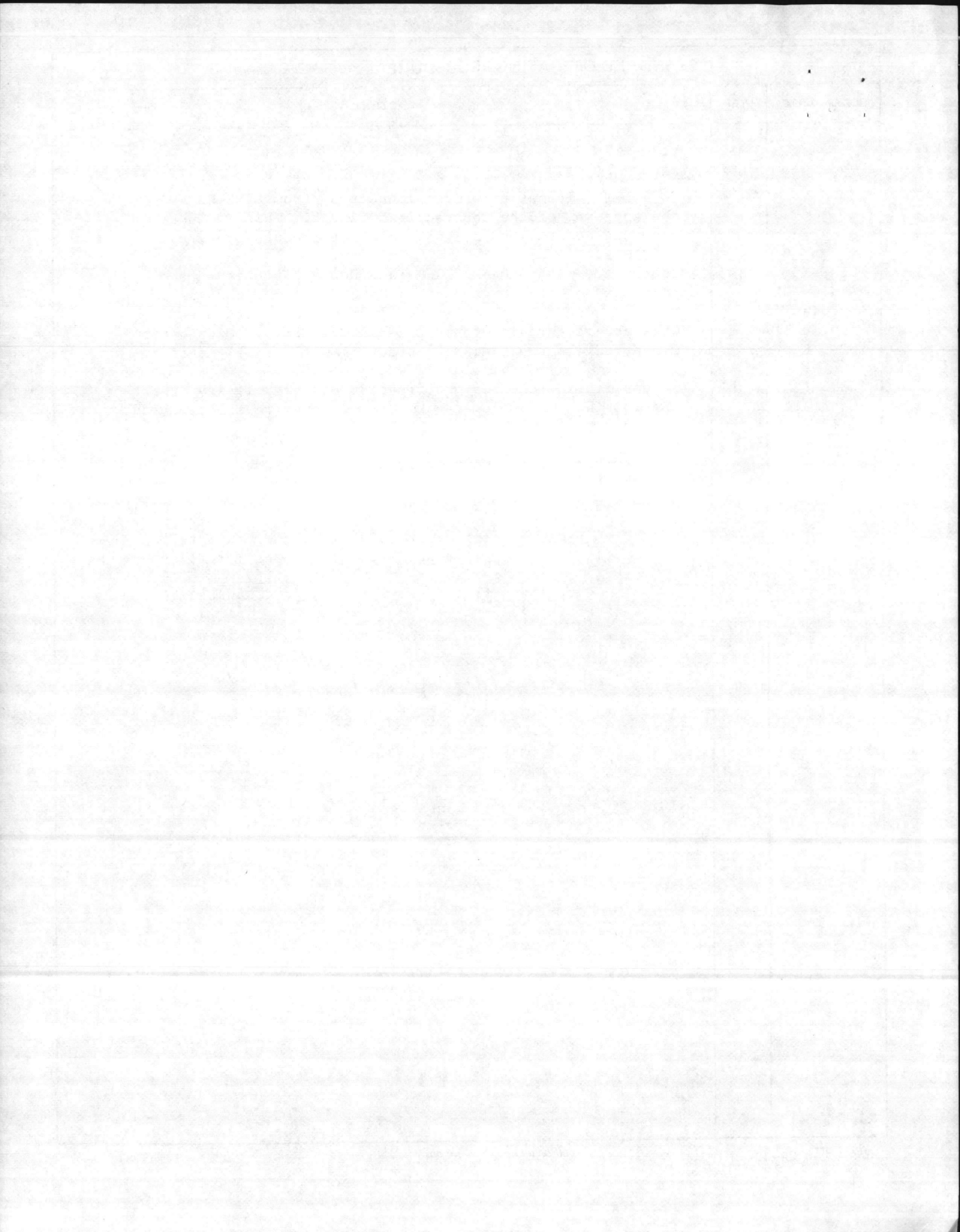
STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
DRMS-HO Action Officer/ Specialist	36.	Establish, based on turn-in activity's past history, a pre-turn-in accelerated waste testing program that will be applicable to subsequent turn-in actions, as set forth in Enclosure 3.
DRMR Environmental Specialist	37.	Develop and maintain a mis-identified hazardous property trend analysis for their DRMOs and quarterly provide DRMS with trend results. This analysis to be included in the Environmental Program Quarterly Report - RCA DPDS-H-1-1000(Q).
DRMS-H Action Officer/ Specialist	38.	Analyze the trend results and provide 80-5 Working Group and Services Major Commands copy of the trend analysis.
TREATMENT STORAGE AND DISPOSAL SITE (TSD) ACTIONS		
TSD Operator	39.	Review the manifest and related paperwork, if TSD operator surfaces problem(s), DRMS contractor will be immediately notified by the TSD operator, the DRMS contractor should then notify the DRMO/COR."
DRMO or Contracting Officer Representative	40.	Notify the DRMS Contracting Officer who in turn contacts DRMS-HO for recommendation to accept return of property rejected by the disposal site or designation of an alternate disposal site.
DRMS Contracting Officer	41.	Initiate, as the situation dictates and to the extent the contract language will allow, actions that will enable the TSD to accept the property. The individual activity will be notified of the adjustment. These actions may include, but are not limited to:
		a. Adjustment to quantities indicated.
		b. Correction of property identification.
		c. Deletion from the manifest troubled property that the TSD facility is not authorized/permitted to accept.
		d. Authorize the DRMS contractor to, upon TSD facility rejection of the troubled property, annotate the manifest to reflect delivery and disposal of the troubled property at an alternative site permitted to dispose of such property. (40 CFR 263.21 and paragraphs H.15.1 and b).
		e. Negotiate, on a case-by-case basis, with the contractor a mutually acceptable price adjustment(s) in accordance with the claims/provisions set forth in the Federal Acquisition Regulation (FAR).
	42.	Review the alternatives of steps 31, 32, and 41 and on determination that they afford no possible solution, advise DRMS-HO of the situation.



STANDARD OPERATING PROCEDURE — (Continuation Sheet)

RESPONSIBILITY	STEP	ACTION
DRMS-HO Action Ofr/ Specialist/ Applicable 80-5 Rep(s)	43.	<p>NOTE: Under no circumstance will property be returned to a DRMO without prior recommendation from DRMS-HO and the approval of the Contracting Officer. This includes unannounced attempts by contractors to return property to DRMOs.</p> <p>Coordinate with DRMS-R, DRMRs and DoD activities in the proximity of the TSD to determine a site that possesses adequate conforming/most nearly conforming storage and will accept turn-in of the troubled property. Once determined, advise the DRMS-P Contracting Officer of the site.</p>
DRMS-P Contracting Officer	44.	<p>Accomplish as feasible modification of the delivery order and initiate a supplemental manifest covering the troubled property.</p> <p>a. Provide the contractor with the amended delivery order. NOTE: Only Contracting Officer has authority to amend the delivery order.</p> <p>b. Direct the contractor to deliver the property to a specified facility at a specific government installation.</p> <p>c. Negotiate with the contractor a price adjustment for this additional work.</p>



CHECKLIST FOR HAZARDOUS PROPERTY (HM/HW) TURN-INS
AND COMPLETION OF DD FORM 1348-1, DISPOSAL TURN-IN
DOCUMENT (DTID)

NOTE 1: The key to the disposal system is proper identification of the property upon receipt. To assure proper identification, the DRMO must:

1. Assure it accepts accountability of only HM/HW which is properly identified, packaged and labeled.
2. Reject, via the DPDS Form 917, Disposal Reject/Advice Notice, that property which does not meet minimum turn-in (identification, packaging, labeling) procedures.
3. Notify Environmental Specialist/Monitor of rejection.
4. Coordinate and assist the turn-in activities in understanding the DRMS turn-in requirements and assist them in the proper preparation of the Disposal Turn-In Document (DTID).
5. Preplan, schedule and coordinate hazardous property turn-ins.

NOTE 2: If the questions are not applicable, indicate N/A in the satisfactory column.

ACTION REQUIRED FOR TURN-IN

I. IDENTIFICATION/DESCRIPTION OF PROPERTY

A. NSN or LSN/FSC identifying hazardous property

1. Valid NSN (13 number code assigned to each item in Federal Supply System)

2. Noun name as cataloged in the supply system is required with NSN.

3. Chemical name of hazardous components (LSN only)

4. Chemical name of hazardous contaminants and noun name of non-hazardous contaminants.

Satisfactory
Yes/No

ACTION REQUIRED FOR TURN-IN

Satisfactory
Yes/No

5. Amounts of hazardous and non-hazardous contaminants based on users knowledge or testing of the item expressed in a range of content or parts per million as applicable.

B. PCB Items

1. Scientific analysis accompanies the item.

2. Item bears a manufacturers label or nameplate indicating PCBs.

3. PCB analysis stipulates PCB in following parts per million (PPM)

a. Less than 50 PPM - non-PCB

b. 50 PPM to 499 PPM - PCB Contaminated

c. 500 PPM and up - PCB item

4. Each item has an individual analysis attached or accompanying.

5. Hermetically sealed capacitors, etc., suspected of containing PCBs, but which have not been analyzed will be worse cased (500 PPM or over).

6. Batch tested mineral oil dielectric items have DLA/DRMS approval for batch test.

II. PACKAGING OF HAZARDOUS PROPERTY

A. Containers - Any portable device in which a material is stored, transported, disposed or, otherwise handled.

1. Non-leaking, safe to handle, able to withstand normal handling.

2. Hazardous wastes are contained in DoT specified containers.

3. Property intended for public highways travel meets DoT requirements.

ACTION REQUIRED FOR TURN-IN

Satisfactory
Yes/No

4. Property in original military containers must include certification of condition of the container.

5. DoD property in foreign countries or territories is packaged in conformance with Host Country's environmental laws and/or status of forces agreements.

III. LABELING AND MARKING OF HAZARDOUS PROPERTY

A. Marking - applying the required descriptive name, instructions, cautions, weight or specifications marks on containers, (49 CFR 171.8).

1. Marking for off-site turn-in (49 CFR 172. et seg.).

a. Label is durable, in English (for domestic shipments) printed on or affixed to the surface of the package or on a label, tag or sign (49 CFR 172.304(a)(1)).

b. Foreign shipments marking comply with foreign government regulation.

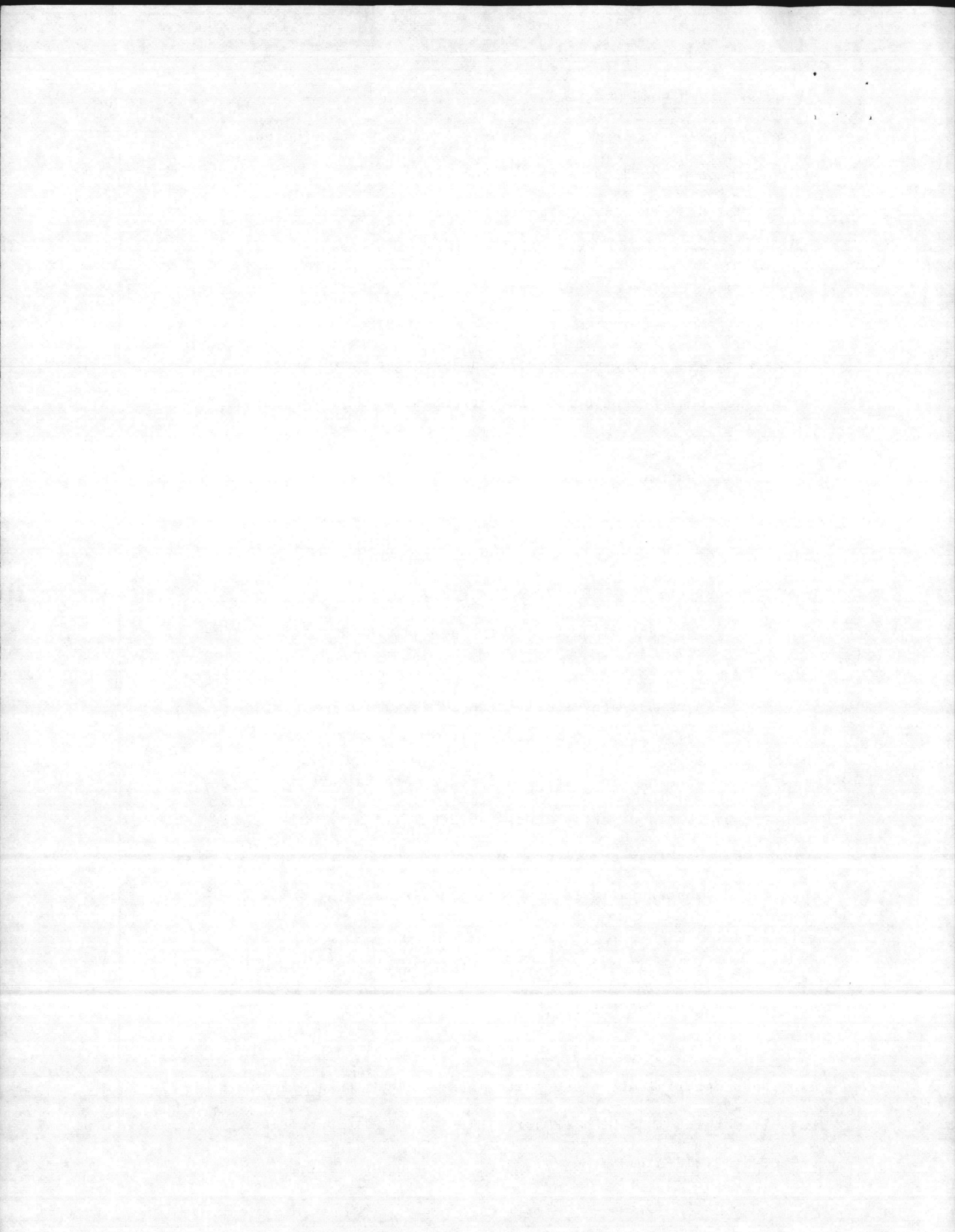
c. Markings are displayed on a background of sharply contrasting color (49 CFR 172.304(a)(2)).

d. Markings indicating hazardous material are not obscured by labels or attachments (49 CFR 172.304(a)(3)).

e. Markings are located away from any other marking that could substantially reduce its effectiveness (49 CFR 172.304(a)(4)).

f. Other Regulated Material (ORM) has proper ORM markings on the package (49 CFR 172.316(a)).

g. Packages having an inside package containing liquid hazardous material are packed with inner closure upwards and legibly marked "THIS SIDE UP" or "THIS END UP" as appropriate (49 CFR 172.312(a)(1) and (2)).



ACTION REQUIRED FOR TURN-IN

Satisfactory
Yes/No

2. Marking for on-site turn-in (see 49 CFR 127. et seq.).

NOTE: On-site turn-in of HW. The date on which accumulation of waste began in the container must be marked on each container if the host installation is not permitted and must comply with the 90 day accumulation rule.

a. Is each package of hazardous waste offered for or transported off-site marked with the applicable DoT markings (49 CFR Part 172, 40 CFR 262.32(a)).

b. Each container of 110 gallons or less used to transport hazardous waste off-site is marked, in accordance with 49 CFR 172.304, as below:

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal.

If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generators Name and Address _____

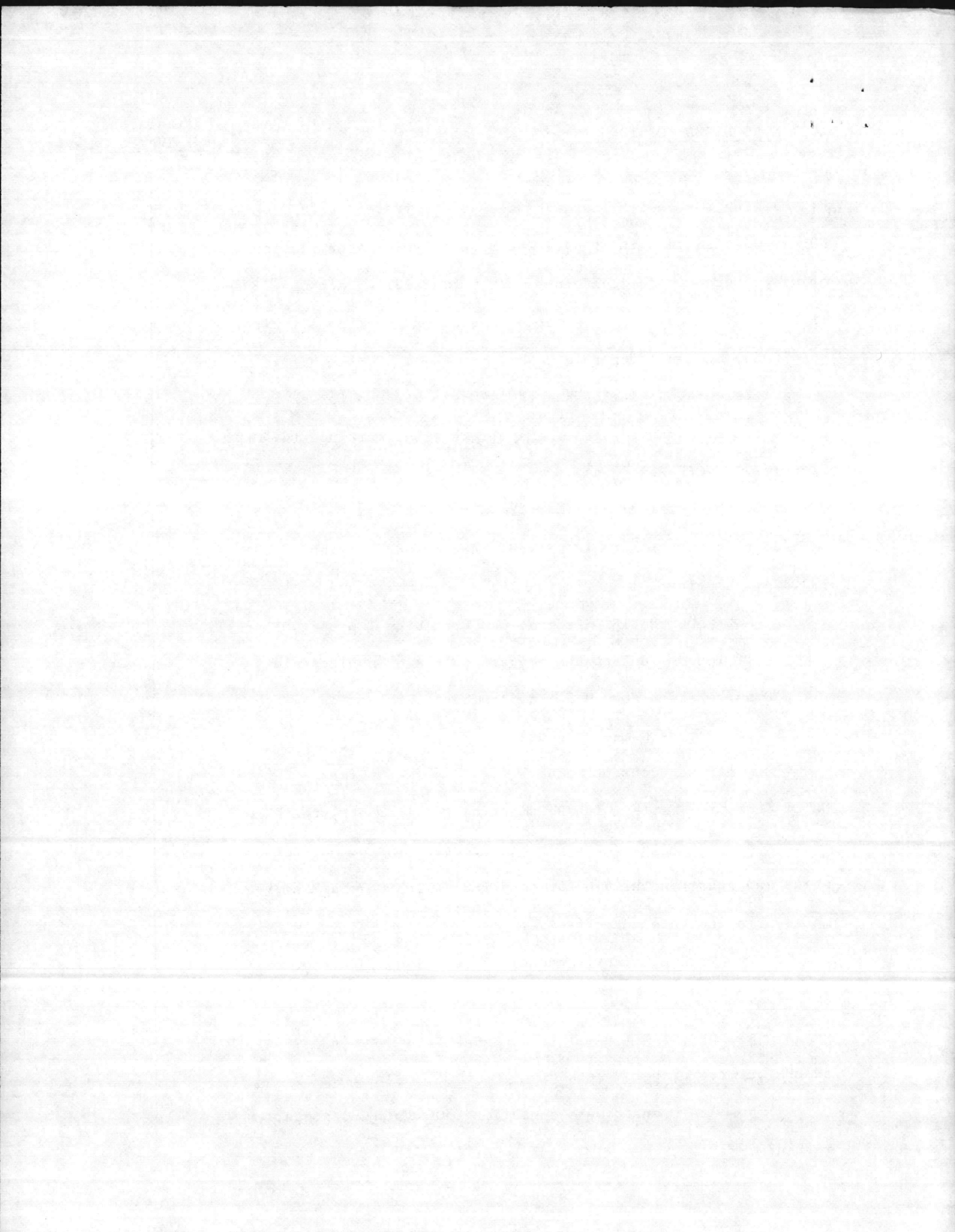
Manifest Document Number _____

NOTE: For compliance with DoT marking requirements, the DRMO is considered the generator for on-site turn-ins of hazardous waste and thus responsible for compliance with DoT marking requirements prior to shipment off-site.

3. PCB Markings (Environmental Protection Agency (40 CFR 761.45)).

a. Are electronic items, except transformers, containing 50 PPM or more properly marked?

b. Are transformers containing 500 PPM PCBs properly marked?



ACTION REQUIRED FOR TURN-IN

B. Labeling - any diamond, square or rectangular shaped attachment affixed to a package that identifies the hazardous nature of the material (49 CFR 172).

1. Labeling for off-site turn-in (49 CFR 172).

a. Does the package bear the label which represents the hazardous class of the material (49 CFR 172.401(a)(2))?

b. Lab packs containing a hazardous material applicable to more than one hazardous class is labeled as required for each hazardous class (49 CFR 172.402(a)).

c. Compatible hazardous materials packaged within the same overpack or outside container is labeled to reflect each class of hazardous property contained therein (49 CFR 172.404(a)).

d. Is the required label printed on or affixed to the surface of the package near the marked proper shipping name (49 CFR 172.406(a))?

e. When required, are the two or more labels affixed next to each other (49 CFR 172.406(a)) and are they affixed to contrasting colored background or bordered by solid line outer border (49 CFR 172.406(d))?

f. Are the labels weather resistant and durable (49 CFR 172.407(a))?

2. Labeling for on-site turn-ins (49 CFR 172).

NOTE: Although no specific labeling requirements exist for on-site turn-in of HW, most generators find it convenient to utilize the hazardous waste mark in label form which also allows them to indicate accumulation start date.

ACTION REQUIRED FOR TURN-IN

Satisfactory
Yes/No

a. DRMO is considered the generator for on-site turn-in of hazardous waste and thereby responsible for complying with DoT labeling requirements prior to transporting off-site.

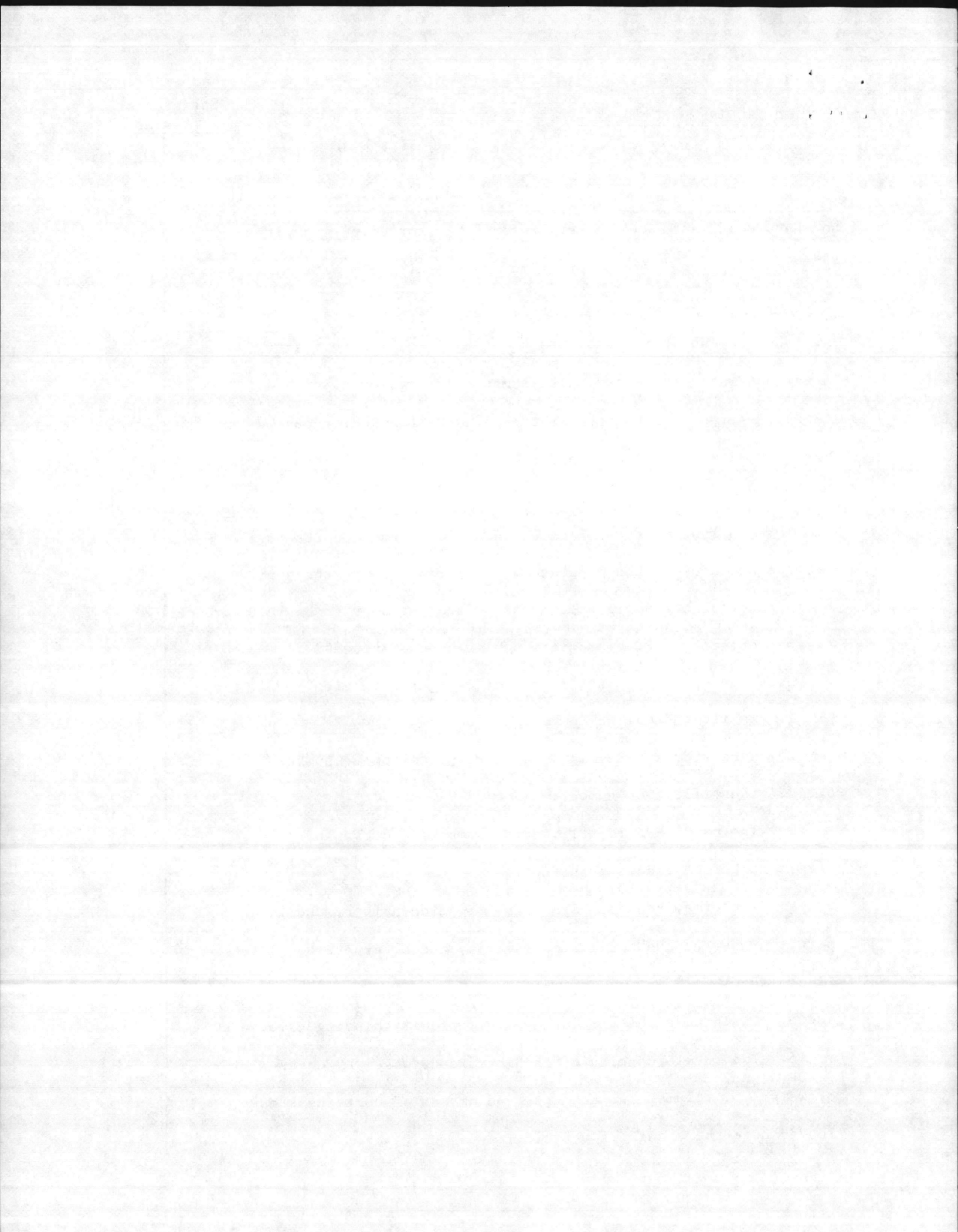
IV. MANIFESTING OF HAZARDOUS WASTE

A. When a generator transports or offers for transportation hazardous waste for off-site treatment, storage or disposal (TSD), EPA requires the preparation of a Uniform Hazardous Waste Manifest, EPA Form 8700-22 and 8700-22A, Uniform Hazardous Waste Manifest and Continuation Sheet. Is the manifest attached?

B. The manifest must be prepared in at least four copies to provide one copy to the generator, each transporter, the owner or operator of the designated facility and one copy to be returned to the generator. Have adequate copies been provided?

C. Does the manifest contain the following information?

1. Manifest document number.
2. Generator's name, mailing address, telephone number, and EPA identification number.
3. The name, EPA identification number, and transporter permit number of each transporter.
4. The name, address, EPA identification number, and TSD permit number of the designated facility and alternate facility, if applicable.
5. Description of the waste, e.g., proper shipping name, etc.
6. The total quantity of each hazardous waste by units of weight or volume, and the type and amount of containers as loaded onto the transport vehicle.



ACTION REQUIRED FOR TURN-IN

Satisfactory
Yes/No

7. The following certification must appear on the manifest:
"I certify that, if I am a generator of more than 1,000 kg of hazardous waste a month or lesser amounts of acutely hazardous waste as identified in 40 CFR 261.5(e), I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations."

D. The generator must sign the manifest by hand and obtain the hand-written signature of the initial transporter, retain one copy and give the transporter the remaining copies. The permit holder (Installation Commander) has primary responsibility for signing manifest, but may delegate signature authority. The DRMO, however, will sign all manifests for shipments of hazardous property on DLA accountability records. In those instances where the permit holder delegates signature authority to the DRMO, then only one signature will appear on the manifest.

E. Is all hazardous waste that was transported over a public highway accompanied by a proper manifest?

PROPERTY DISPOSAL REJECT/ADVICE

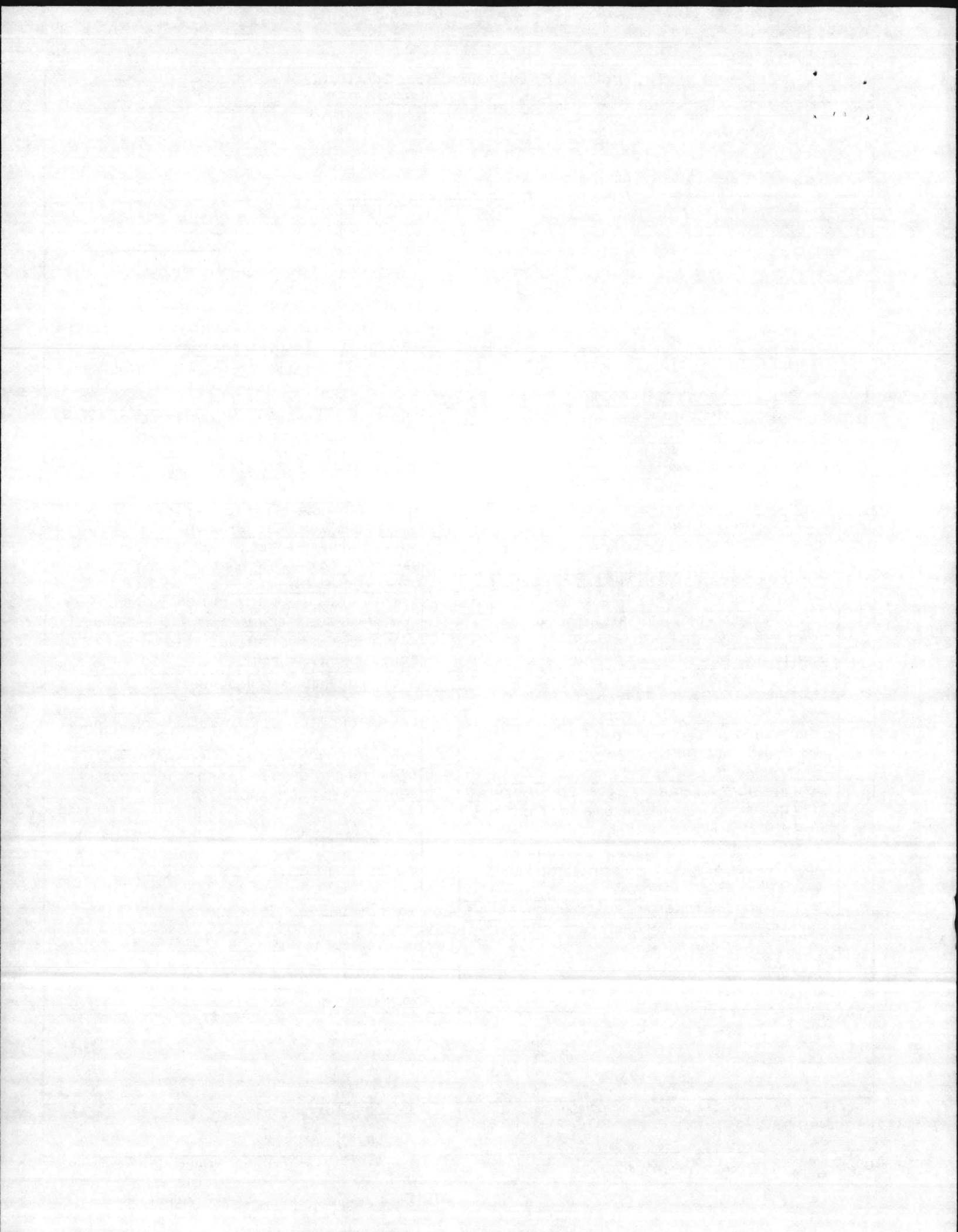
(Prescribing Authority: DPDS-M 4160.3 & 4160.6)

FROM	DATE
	TID NO.
TO	NSN/LSN
	<p>THIS PROPERTY IS BEING</p> <p><input type="checkbox"/> RETURNED</p> <p><input type="checkbox"/> HELD WITHOUT PROCESSING</p> <p>FOR THE REASON(S) LISTED BELOW.</p> <p><u>PLEASE TAKE PROMPT CORRECTIVE ACTION.</u> (Refer to DoD 4160.21-M, Chapter IV, unless otherwise specified.)</p>

<p>PROPERTY RECEIVED WITHOUT TID.</p> <p>INSUFFICIENT NUMBER OF COPIES OF TID.</p> <p>NATIONAL STOCK NUMBER (NSN) IS INCORRECT. (DPDS-H 4160.3, Volume II).</p> <p>PROPERTY RECEIVED IS NOT PROPERLY DESCRIBED ON TID.</p> <p>DoD CONDITION CODE NOT ON TID.</p> <p>INERT CERTIFICATE REQUIRED. (DoD 4160.21-M-1, Chapter II).</p> <p>ITEM IS INCOMPLETE. VALUE AND LIST OF COMPONENT PARTS THAT HAVE BEEN REMOVED IS REQUIRED.</p> <p>CONTAINERS LEAKING. REQUIRES REPACKAGING. (DoD 4160.21-M, Chapter VII).</p> <p>DEMILITARIZATION CODE NOT ON DTID OR INCORRECT.</p> <p>DEMILITARIZATION CODE "G". PROPERTY MUST BE DEMILITARIZED PRIOR TO TRANSFER TO DPDO. (DoD 4160.21-M-1).</p> <p>DEMILITARIZATION CODE "F". INSTRUCTIONS FOR DEMILITARIZATION MUST ACCOMPANY TID. (DoD 4160.21-M-1).</p> <p>DEMILITARIZATION CODE "X". LOCAL DEMILITARIZATION DETERMINATION REQUIRED PRIOR TO DISPOSAL. (DoD 4160.21-M-1).</p> <p>PROPERTY DEMILITARIZED PRIOR TO TURN-IN. REQUIRES CERTIFICATION ON DTID. (DoD 4160.21-M-1, Chapter II).</p> <p>MUTILATED ITEM ACCEPTABLE ONLY AS SCRAP.</p> <p>INVALID DoD ACTIVITY ADDRESS CODE (DoDAAC)</p>	<p>PROPERTY NOT DPDO RESPONSIBILITY. SEE DEOPPM 80-5.</p> <p>NSN/LSN/FSC REQUIRE CHEMICAL NAME OF HAZARDOUS COMPONENTS/CONTAMINANTS; NOUN NAME OF NON-HAZARDOUS CONTAMINANTS; PERCENTAGE/RANGE OF CONTAMINANTS.</p> <p>MANIFEST REQUIREMENTS FOR PRE-DETERMINED HAZARDOUS WASTE NOT SATISFIED.</p> <p>DOT (OR EQUIVALENT) CONTAINER, DOT SHIPPING NAME, HAZARD CLASS, ID NUMBER REQUIRED FOR OFF-SITE SHIPMENT.</p> <p>CERTIFICATION OF TRUE CONDITION/RELIABILITY OF CONTAINER REQUIRED (DoD 4160.21-M, Chapter VI).</p> <p>CONTAINER UNSAFE TO HANDLE/WILL NOT WITHSTAND NORMAL HANDLING.</p> <p>LABEL REQUIRED/LABEL INCORRECT.</p> <p>LAB ANALYSIS REQUIRED FOR PCBS.</p> <p>CONFORMING STORAGE/MOST NEARLY CONFORMING STORAGE IS UNAVAILABLE</p> <p>DTID IMPROPERLY PREPARED (SEE REMARKS).</p> <p>DEMILITARIZATION CODE ASSIGNED TO DTID IS INCORRECT AND WAS CHANGED:</p> <p>FROM _____ TO _____ AS REQUESTED BY _____</p> <p>OF _____</p> <p>IN A TELECON WITH _____</p> <p>OF THIS DPDO ON _____</p> <p>(DoD 4160.21-m-1, Chapter I).</p>
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REMARKS

SIGNATURE (Chief, Defense Property Disposal Office)	DATE
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Pre-Turn-In Accelerated Property Testing Program

General: This accelerated waste testing program's purpose is to assure that hazardous property presented for turn-in has been, by the turn-in activity, properly identified, containerized and marked in accordance with all applicable federal, state and local directives. Turn-in activity compliance will expedite the disposal of the property and reduce or preclude turn-in activity and DRMS citations for non-compliance with the governing directives.

When the DRMO, based on personal knowledge and records, determines a turn-in activity has a history of improper/mis-identification of hazardous waste turn-ins the DRMO may, with DRMR, DRMS and the 80-5 Representatives approval, implement the verification procedure that follows:

Procedure for Verification of Generator's Property Identification

1. All sampling will be accomplished at the DRMO not the generator's location except for property received in place which will necessitate sampling at the generator/host site. This testing to be accomplished prior to DRMOs acceptance of the property.
 2. DRMO will establish the testing lot as being all hazardous property from one generator covered by a single turn-in action.
 3. Unopened commercial chemical products that are properly labelled with original manufacturers labels do not require verification.
 4. Once the test lot is established, the number of samples required from the lot will be in accordance with Schedule A this enclosure. This schedule will prevail for a period of three months.
 5. At the end of the three months testing, if no discrepancies are noted with generator identification, reduced sampling in accordance with Schedule B will apply. If discrepancies are noted, a 100% testing of the lot will be accomplished. This schedule will prevail subject to the provisions of note below.
- NOTE: Recording of any discrepancies under Schedule B operation will mandate the return to Schedule A and also require 100% testing of the lot in question.
6. The parameters for this testing will be:
 - a. Flash point
 - b. PH
 - c. Halides
 - d. Reactivity
 - e. Physical characteristics

2
A
C 1 1 4

7. The DRMO has three options for obtaining this sampling and analysis (physical sampling effort to be accomplished by the analysis activity.)

a. Coordinate with generator/turn-in activity for conduct of this analysis.

b. Obtain the service from another DoD activity (e.g., Army Environmental Health Agency).

c. Obtain the service through contract with private sector source via DRMS. Turn-in activity to provide funding for the sampling and analysis accomplished by 7 b and 7 c above.

Results of testing analysis will be compared to the generator/turn-in activity identification of the hazardous waste.

a. If results disagree with generator/turn-in activity's identification, reject turn-in of the lot or;

b. If results verify generator/turn-in activity's identification, continue the processing of the lot.

8. Analysis activity reports concurred in by the DRMO Environmental Specialist/monitor that contradict information provided by the generator/turn-in activity shall be immediately reported to the DRMO and, by letter to the Commander of the turn-in activity, for appropriate action.

9. Copy of the analytical results shall be maintained in the DRMO/OSB operating records for a three-year period.

6
x
A

Number of Samples to be Collected as a Function
of the Number of Items in the Lot

SCHEDULE A
(once per month)

LOT SIZE	NUMBER OF SAMPLES TO BE TAKEN
2 to 8	2
9 to 15	3
16 to 25	5
26 to 50	8
51 to 90	13
91 to 150	20

SCHEDULE B
(once per quarter)

LOT SIZE	NUMBER OF SAMPLES TO BE TAKEN
2 to 8	1
9 to 15	2
16 to 25	2
26 to 50	3
51 to 90	5
91 to 150	8

