



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON WEST POINT
681 HARDEE PLACE
WEST POINT, NY 10996-1554

IMML-PWE-M

11 July 2016

U.S. ARMY GARRISON WEST POINT POLICY #26

SUBJECT: Installation Hazardous Waste Management

1. REFERENCES:

- a. Title 40, Code of Federal Regulations, Parts 260-279 (40 CFR 260-279).
- b. Title 42, United States Code, Sections 6901-6992, (42 USC 6901-6992), Resource Conservation and Recovery Act (RCRA), as amended.
- c. Title 6, New York Codes Rules and Regulations 370-374 (6 NYCRR 370-374).
- d. AR 200-1, Environmental Protection and Enhancement, dated 13 December 2007.

2. PURPOSE. This policy prescribes responsibilities, standards and procedures for the efficient and economical removal of Hazardous Waste (HW), universal waste, and used oil in an environmentally and legally acceptable manner (Encl 1). If you have questions concerning HW or this policy, please contact the Directorate of Public Works (DPW), Environmental Management Division (EMD).

3. APPLICABILITY. This policy is applicable to all West Point activities; tenants and organizations; and to all users of West Point facilities. West Point is subject to all Federal, state, interstate and local requirements, both substantive and procedural, respecting control and abatement of solid waste or HW disposal and management. This policy includes the management and disposal of HW as defined in Title 6 NYCRR 371, universal waste as defined in 6 NYCRR 374-3, and used oil as defined in 6 NYCRR 374-2. This policy also establishes procedures for handling waste munitions and waste tritium exit signs. This document supplements the rules and regulations annotated in AR 200-1. Therefore, AR 200-1 should always be referenced with this supplement when evaluating the responsibilities, standards, and procedures for the removal of HW.

4. POLICY. All activities are responsible for ensuring any waste they generate is characterized to determine if it is subject to this policy. All activities are responsible for ensuring the HW policy articulated in AR 200-1, para 10-1, and in 6 NYCRR 370-374 is followed. The EMD will provide assistance and analysis services to generators as

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necessary to make this determination. Activities will manage HW, universal waste, used oil, waste munitions, and waste tritium exit signs in accordance with this policy and the enclosed procedures.

5. RESPONSIBILITIES.

a. The Garrison Commander (GC) has the overall responsibility for an Installation's compliance with Federal, state and local HW laws and regulations. The GC will:

(1) Ensure HW management activities are conducted according to Federal, state, local, and Army regulations.

(2) Determine resource requirements.

(3) Provide necessary resources to West Point activities to ensure compliance with Federal, state, local, and Army regulations.

(4) Sign RCRA HW permit applications for the Installation as the "facility" owner. This responsibility cannot be delegated.

(5) Ensure that senior mission commanders immediately report spills or releases of petroleum, hazardous substances, or HW to the fire department and other agencies, in accordance with the Installation Spill Contingency Plan.

(6) Ensure Directors of government owned contractor-operated facilities are verifying that contractors working on West Point are assuming responsibility for management and disposal of contractor-generated solid waste and HW.

(7) Ensure that hazardous materials and wastes are accurately tracked "cradle-to-grave" at all hazardous materials sites using the Enterprise Environmental Safety, and Occupational Health- Management Information System (EESOH-MIS) in accordance with Army regulations.

b. All Major Activity Directors, supervisory personnel, and tenants will:

(1) Ensure that the policies stated in this document are carefully observed within their activity and cooperate fully with the EMD in managing HW.

(2) Ensure that all suspected HW generated by their activity is reported using EESOH-MIS, as required, for the purposes of verification and record keeping.

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(3) Follow "Green Procurement" regulations and purchase environmentally safe products as much as practical. Employ proper inventory control and avoid stock-piling hazardous materials. Recycle wastes when possible and feasible.

(4) Ensure that all HW generated by their activity is accumulated and handled in accordance with this policy.

(5) Ensure that all HW handlers are fully aware and knowledgeable of these HW management requirements and have taken the required training classes.

(6) Ensure that all HW handlers meet Occupational Safety and Health Administration (OSHA) training requirements.

(7) Report any spills or leaks of HW in accordance with the Installation Spill Contingency Plan.

(8) Provide keys to HW accumulation areas to the Fire and Emergency Services Division.

c. DPW EMD will:

(1) Plan, direct, and coordinate HW determination; ensure proper compliance of accumulation, handling, and removal.

(2) Develop contract specifications for off-site disposal of HW, for inclusion in Defense Reutilization and Marketing Office (DRMO) contract and review DRMO specifications.

(3) Maintain overall surveillance of HW areas to ensure compliance with this policy.

(4) Maintain inventory and inspection records for the 180-day accumulation site

(5) Consult, coordinate and report HW activities as required by Federal, New York State and Headquarters Department of the Army (HQDA) agencies.

(6) Maintain and operate the West Point <180-day accumulation site. DPW will transport wastes to the <180-day accumulation point as required.

(7) Identify and provide HW training required by West Point personnel.

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(8) Assist Directorate and other Installation activities as required in complying with Federal and state HW regulations.

d. The Installation Safety Officer will monitor the accumulation and handling of HW to ensure compliance with current Federal and state OSHA safety standards.

e. The Office of Staff Judge Advocate will:

(1) Provide guidance and legal opinions to EMD and other personnel on the applicability of Federal, state and local laws and regulations governing HW, universal waste, and used oil.

(2) Provide advice and guidance to Academy officials on their legal responsibilities for complying with all applicable environmental requirements.

f. Directorate of Plans, Training, Mobility and Security will:

(1) Ensure that any explosive ordnance disposal activity on the ranges conforms to section f (3) of Enclosure 1 of this policy.

(2) Ensure that burning of excess propellant generated during training is conducted in accordance with section f (4) of Enclosure 1 of this policy.

g. Directorate of Emergency Services will provide fire suppression and control during excess propellant training.

h. HW Generators will:

(1) Ensure that all HW generated during operations are identified with a Safety Data Sheet (SDS).

(2) Develop a method of tracking these wastes to minimize the potential for mixture with non-hazardous wastes, worker exposure, and spills.

(3) Identify, package, and accumulate HW in accordance with this policy.

(4) Provide a satellite accumulation point for HW, as required.

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(5) Notify the West Point Fire Department and Directorate of Emergency Services (DES) immediately of any spills or releases of petroleum, hazardous substances, or HW leaks or other problems in accordance with the Installation Spill Contingency Plan

6. EXPIRATION: This policy will remain in effect until superseded or rescinded.

- 4 Encls
1. HW Management Procedures
 2. Acronyms/Abbreviations
 3. HW <180 Day Accum. Site
 4. Tritium Exit Sign Data Sheet



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HAZARDOUS WASTE MANAGEMENT PROCEDURES

1. General Hazardous Waste Requirements.

a. Characterization.

(1) HW is defined in 6 NYCRR 371.

(2) Generators are responsible for ensuring all wastes are properly characterized and have an SDS prior to disposal.

(3) HW will be turned into the Solid Waste Management Branch (SWMB) of the Environmental Management Division (EMD) immediately or accumulated on site in compliance with this policy.

(4) Generators accumulating HW will immediately notify the EMD if the process generating the waste changes.

(5) Once notified of the change, the EMD will reanalyze the waste, if necessary, to ensure it is still classified as a HW.

(6) HW will not be mixed with non-HW; mixing causes the entire mixture to be regulated as a HW.

b. Accumulation.

(1) HWs are accumulated in Satellite Accumulation Points (SAP's) or at the <180-Day Accumulation Site located in MAG-9 (Bldg 1241).

(2) All HW accumulation will be coordinated with the EMD and SWMB.

(3) Any activity accumulating HW on-site on a one-time-only basis will be subject to the requirements in this policy.

2. Site Requirements.

a. Site Requirements: Prior to accumulating HW, generators must coordinate with the EMD. Each activity will designate a point of contact (POC) and alternate to handle HW. Names and phone numbers of POC's will be forwarded to the EMD. SAPs and the <180-day accumulation site will meet the following site requirements:

(1) HWs will be placed within an area taking into consideration the hazard potential resulting from incompatible materials storage.

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(2) HWs shall be placed on spill containment pallets or other appropriately contained areas to catch waste in case of a spill.

(3) Appropriate spill response materials will be available.

(4) Areas, if enclosed, must be provided with adequate ventilation and lighting.

(5) Areas will keep proper fire/safety equipment. An appropriate fire extinguisher will be maintained within 75-feet of area. "No Smoking" signs and/or "No Open Flame" signs will be posted if there is a fire hazard. Provide signage in compliance with NFPA 704.

(6) Areas shall make provisions for security. The area will not be readily accessible by unauthorized personnel.

(a) All drums or containers not located in a secure locked area or cabinet will be secured by a bung lock.

(b) All activities will provide access to secure HW areas to DPW, EMD, SWMB as required.

b. Container Maintenance: Containers at SAPs or the <180-day accumulation site will meet the following requirements:

(1) Only new/unused or used re-certified United Nations (UN) approved containers may be used to accumulate HW.

(2) Containers will be kept upright.

(3) Containers at outdoor sites will be covered to prevent moisture damage.

(4) Containers of HW must not be opened, handled or stored in a manner that may rupture the container or cause it to leak.

(5) Containers of waste must always be closed, except when it is necessary to add or remove waste.

(6) Containers shall be made of, or lined with, materials that are compatible with the HW to be stored.

(7) Containers holding HW must be in good condition. Any container of hazardous material or waste that exhibits signs of severe rusting, structural defects, or that begins to leak will be handled in one of the following ways:

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(8) Transfer the material/waste to a container that is in good condition.

(a) Over Pack the Container. If you require assistance, please call the SWMB.

(b) Incompatible wastes shall be segregated by berms.

(c) Containers will not be completely filled. Space will be left to allow for expansion of the waste in changing temperatures.

c. Container Labels. Containers used to accumulate HW must be marked with the words "Hazardous Waste" and with other words that identify the contents of the container.

3. Satellite Accumulation Points.

a. Accumulation.

(1) SAPs must be approved by the SWMB and EMD prior to use.

(2) No SAP may accumulate more than 55 gallons of any waste stream.

(3) SAPs that accumulate acute HW ("P" listed waste) will not accumulate more than one quart of these wastes at any time.

b. Container Labels.

(1) Generators will fill out the contents section of the label. They will leave the start date blank.

(2) SWMB personnel will fill in the start date when the container is full and moved to the <180-day accumulation site.

c. Excess Accumulation at SAPs.

(1) Up to 55-gallons of each HW stream may be accumulated at SAPs.

(2) When containers are nearly full the accumulation point manager should contact the SWMB to arrange for pickup of the waste.

(3) Generators should plan ahead so that pickup can be arranged before the container is full.

(4) If the SWMB is unable to pick up the waste before the container is full, waste may be accumulated in another container for up to 72 hours.

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(5) In addition to the labeling requirements of paragraph b(3), the container used to accumulate the excess waste must be labeled with the date the excess began to accumulate. This is the only time a generator at a SAP will put a date on a HW container.

(6) Once the 55-gallon limit is reached at a SAP, the waste must be moved to the <180-day site within 72 hours.

d. Training. HW personnel responsible for managing SAPs will receive a HW briefing from EMD.

4. <180-Day Accumulation Site.

a. Small Quantity Generator Status: Under normal circumstances West Point is a Small Quantity Generator (SQG) of Hazardous Waste. Occasionally a situation will arise that causes West Point to become a Large Quantity Generator (LQG). In the event that West Point becomes a LQG, the <180- day accumulation site will become a <90- day accumulation site and the regulations that apply to 90- day sites will be complied with.

b. Turn-In Inspection.

(1) When containers of waste are brought to the <180- day accumulation site the <180- day manager will visually inspect the container and its cover and closure devices to check for visible cracks, holes, gaps, or other open spaces into the interior.

(2) If a defect is detected, the site manager will repair the container, over pack the container, or transfer the contents to a new container.

(3) Repair, over pack, or transfer will be initiated within 24 hours of discovering the defect and completed within 5 days.

(4) Defects and the steps taken to correct them will be annotated in the facility log.

c. Container Date.

(1) Each waste container in the <180-day accumulation site will be marked with an accumulation date.

(2) Each container will have a label as specified in paragraph b(3).

(3) For waste received from SAPs, the date on the label will be the day the drum was moved to the <180-day accumulation site (except as noted in section b(5)).

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(4) For waste accumulated at the <180-day accumulation site, the date will be the day waste was first put into the drum.

d. Site Requirements.

(1) Personnel entering the <180-day accumulation site will have a two-way radio or cell phone capable of summoning emergency assistance from local police and fire departments.

(2) Portable fire extinguishers, spill control equipment, eyewash station and decontamination equipment will be located at the site.

(3) All communications and safety equipment will be tested and maintained as necessary to assure its proper operation in an emergency. Inspections and testing will be documented on the weekly inspection forms (Encl 3).

(4) Aisle space will be maintained to allow the unobstructed movements of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the site in an emergency.

(5) A copy of the Installation Spill Contingency Plan will be kept available at the hazardous waste management office. Any response to spills or emergencies will be conducted in accordance with the Installation Spill Contingency Plan.

(6) Incompatible wastes will be separated by a dike, berm, wall, or other device.

e. Inspections.

(1) The <180-day accumulation site will be inspected weekly using Enclosure 3.

(2) Completed inspection forms will be submitted to the SWMB weekly.

f. Personnel Records. The contractor responsible for management of the <180-day accumulation site will maintain records for personnel who work at the site in accordance with NYSDEC regulations.

5. One Time Collection Sites.

(a) One-time-only sites will be subject to the same West Point compliance programs until their wastes have been properly removed for disposal.

(b) Any deterioration or malfunction of equipment/structures, will be scheduled for correction so as to ensure that no environmental or human health hazard develops.

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(c) Immediate remedial action will be taken for hazards that have already occurred, such as spills, etc.

(d) All spills will be immediately reported and cleaned up in accordance with proper procedures. Further guidance on spill response can be obtained in the Installation Spill Contingency Plan.

f. Training Requirements.

(1) HW personnel responsible for managing the <180-day accumulation site will receive a HW briefing from EMD once a year.

(2) Newly assigned personnel will not work unsupervised until they have completed training.

5. Procedures for Turn-in, Transportation, and Manifests. Generators will contact the SWMB to arrange for turn-in of HW. HW manifests are not required for transportation of HW between contiguous enclosure areas of West Point, including transportation from the ranges to the <180-day accumulation site. All HW shipped from West Point for disposal will be properly manifested, labeled, and placarded in accordance with New York State and Federal regulations.

a. SAP Turn-in of Hazardous Waste. SAP managers will contact SWMB and follow the procedures in this chapter to arrange for the turn-in of HW.

(1) HW must be turned into the <180-day accumulation site immediately (within 72 hours) upon accumulation of 55-gallons.

(2) A Material Safety Data Sheet (MSDS) will be turned in with the hazardous waste.

b. 180-day Turn-in of Hazardous Waste.

(1) The SWMB will coordinate with the Defense Reutilization and Marketing Office (DRMO) for the removal of HW from West Point to a permitted HW Treatment, Storage and Disposal Facility (TSDF). All HW must be removed from the <180-day accumulation site within 180 days of the accumulation start date.

(2) Prior to shipping HW, the SWMB will obtain written confirmation from the TSDF that they are authorized, have the capacity, and will assure the ultimate disposal is followed for the particular waste on the manifest.

(3) Prior to shipping, the SWMB will obtain written confirmation from the transporter that they are authorized to deliver the waste to the TSDF.

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c. Hazardous Waste Manifests.

(1) All HW manifests will be routed through the EMD for signature, tracking and recordkeeping.

(2) Only trained and authorized personnel from the EMD will sign manifests.

(3) Personnel who sign manifests will be specified in writing and will successfully complete a training course in HW and DOT regulations.

(4) Personnel will inspect that the manifest is correct and ensure that the vehicle is properly loaded and placarded.

6. Record Keeping.

a. Manifests.

(1) The EMD will keep a copy of each complete manifest, Land Disposal Restriction (LDR), and analysis result or MSDS as required by Federal and state regulations.

(2) The EMD will submit a copy of the manifest to the NYSDEC within 5 days of shipping the waste.

b. Exception Reports.

(1) If a copy of the manifest is not received from the TSDf within 35 days of the date of shipping, the EMD will contact the transporter and/or the TSDf to determine the status of the shipment.

(2) If a copy of the manifest signed by TSDf receiving the waste is not received within 45 days of the date of shipping, the Environmental Management Division (EMD) will file an exception report as specified in 6 NYCRR 372.2 (c).

c. Annual Hazardous Waste Report. EMD shall submit completed annual report forms to NYSDEC no later than 1 March for the preceding calendar year. Copies of the report will be kept in the EMD files.

7. Munitions/Explosives. This section covers explosive training, range clearance activities and storage of waste military munitions (WMM) under the Military Munitions Rule (MMR). The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DOD components, including bulk explosives and chemical warfare

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agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges and devices and components thereof. West Point will manage waste munitions and explosives in accordance with the DOD Policy to Implement the EPA's Military Munitions Rule, date 1 July 1998. When applicable, West Point will store WMM in accordance with the conditional exemption (CE). To ensure that we are in compliance with Federal and state regulations, use the DOD Implementation Policy for EPA's Military Munitions Rule.

a. Storage of Waste Military Munitions (WMM). In the event West Point generates or acquires waste military munitions that must be managed on-site the waste will be stored at Building 1281 at the Ammunitions Supply Point by LRC personnel. New York amended Part 374-1.13(f)(h) of their state rule to state that WMM must be stored at government-owned facilities. This will preclude military munitions from being stored at any facilities in the State of New York other than government-owned facilities.

(1) Waivers or exemptions to Department of Defense Explosive Safety Board (DDESB) standards make the unit ineligible for storage under the conditional exemption

(2) The WMM accumulation point manager will do the following:

(a) Keep written records of all WMM stored under CE. These records will contain the following information:

(1) The type of WMM accumulated by standard nomenclature, Lot Number, Federal Supply Class (FSC), National Stock Number (NSN), Department of Defense Ammunition Code (DODAC) and condition code.

(2) The quantity of each type waste military munitions stored.

(3) The date that each military munitions, by type, was identified as waste.

(4) The last storage date for each, by type, waste military munitions.

(5) The storage location or locations (e.g., building number or storage pad, and grid coordinates) used.

(6) The disposition (e.g., destroyed, demilitarized, shipped) and date of action, by type, of the waste munitions.

(7) When applicable, the sending and receiving sites for those WMM received from or shipped to off-site sources.

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(b) Make available to EMD personnel or the appropriate Federal or state environmental regulatory authority these records when requested.

(c) Inventory any WMM stored under CE at least annually.

(d) Inspect any WMM stored under CE, at least quarterly, for compliance with the conditions of CE and maintain records of the inspections.

(e) Limit access to appropriately trained, specifically authorized personnel.

(f) Brief any Federal and state environmental regulatory agency personnel, who require access to determine whether WMM are stored per CE, on explosive safety concerns and cleared for access, are considered trained and authorized.

(g) Assign a person trained in the management and handling of ammunition and explosives to escort the above personnel.

(3) Comply fully, without waiver or exemption, with DOD 6055.9-STD.

(4) Each unit storing CE WMM or explosives must be included in a DDESB-approved explosives safety site plan that the installation or responsible activity keeps on file.

(5) Those portions of the site plan addressing units storing WMM under CE shall be made available to the appropriate Federal or state environmental regulatory authority upon request.

(6) Physically separate (e.g., on a separate pallet or shelf, etc.) WMM from non-WMM when both are stored in the same storage unit or area.

(7) The storage area will be marked "Hazardous Waste Munitions."

(8) Storage records will comply with the DOD Implementation Policy for EPA's Military Munitions Rule, Chapter 7, Section C2a5.

(9) For non-chemical agent WMM that contain liquids (e.g., munitions or missiles that use liquid propellants), the facility used to store the WMM must have either a secondary containment system, which ensures that any released liquids are promptly detected and detained until properly removed from the area, or a vapor detection system, which ensures that any released liquids or vapors are promptly detected so that an appropriate response is taken. (An appropriate response may include additional containment, such as repair of the container, over packing, or removal from the storage

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area.) For these WMM, the storage of non-leaking weapons in their shipping or storage container is considered a means of secondary containment.

(10) The WMM accumulation point manager will notify the EMD as soon as possible upon learning of the theft or loss of any WMM or the failure to meet any of the storage requirements of this section that may endanger health or the environment (e.g., fire, explosion, release, discharge). EMD will notify the New York State Department of Environmental Conservation (NYSDEC), Division of Hazardous Substances Regulation within 24 hours of the release. EMD will follow up with written notice within 5 days of the release.

b. Non-Military Munitions.

(1) Waste non-military munitions will be handled as HW.

(2) When West Point ranges are used by civilian organizations, that organization will keep and be responsible for properly managing any excess munitions generated during training.

(a) Prior to using the range, the organization must sign a statement stating they will not leave any munitions at West Point.

(b) West Point personnel will not take possession of non-military munitions unless seized by the Military Police (MP). Disposal of explosive reactive wastes is very expensive and every effort will be made to return the munitions to the owner or bill the owner for the cost of disposal.

(3) If West Point personnel come into possession of non-military munitions, they will be turned into the MP for storage at SWMB's <180-day accumulation site.

(4) If stable munitions/explosives are seized by the MP, the items become HW at the time they are no longer needed as evidence. The MP will turn the waste munitions over to the SWMB for storage at their <180-day accumulation area.

(5) Storage of Non-Military Munitions.

(a) Any HW munitions (non-military) will be stored in the <180-day accumulation site.

(b) LRC will supply a qualified storage container for munitions.

(c) LRC will supply the proper explosive placards and labels.

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(d) SWMB will set a separate area aside for munitions storage in the <180-day accumulation site if and when waste munitions are required to be stored.

(e) LRC will assist and provide SWMB with munitions training computer courses in accordance with Department of DDESB Standards.

(f) LRC and SWMB will document the training and SWMB will retain records of the training.

c. DPTMS/Range Control will ensure EOD personnel comply with the requirements of this section. EOD personnel may use West Point ranges for training, explosives emergencies, and range clearance activities.

(1) EOD Training:

(a) The use of military munitions in the training of military personnel is not subject to regulation under RCRA. It is the responsibility of the unit conducting the training to maintain records documenting the training in accordance with DOD policy.

(b) Copies of training records must be maintained and available to inspectors.

(c) Training records will include units trained, purpose, dates, training standards, lesson plans, and defined munitions support requirements.

(d) Prior to using the range for training, the EOD unit conducting the training will sign a statement stating the range is being used for training.

(2) Explosives Emergency.

(a) EOD units responding to explosives emergencies at West Point will conduct operations in accordance with DOD policy and any Memorandums of Understanding existing between the unit and the NYSDEC.

(b) If the EOD unit determines the situation does not require an emergency response the items will be turned over to West Point for storage and disposal as HW.

(c) An emergency is defined as an imminent threat to safety, environment, or property and is determined by the emergency response specialist.

(d) After using a range for an emergency, the emergency response specialist will sign a statement prepared by Range Control stating the range was used for an explosives emergency.

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(3) Range Clearance.

(a) Recovery, collection and on-range destruction of military munitions during range clearance activities are not waste management activities.

(b) Used or unused munitions will not be buried on the range.

(c) Used munitions that are removed from the range for storage prior to disposal are HW and will be stored and transported in accordance with this policy.

d. Excess Propellant Training. During the summer, artillery training is conducted at Range 2. Included in the training is instruction in burning excess propellant. The residue from burning excess propellant is a HW and will be managed in accordance with this section.

(1) Before conducting training, the cadre in charge of training at Range 2 will assign two personnel who will be responsible for ensuring waste from burn activities is properly managed.

(2) Before burning excess propellant these personnel will receive a briefing from the EMD.

(3) The EMD will provide containers, labels, and containment pallets for storing the waste.

(4) All burning will be conducted in the containment pan located at Range 2. Residue will be removed from the pan after each use and the pan will be kept covered when not in use.

(5) All waste residues from burning and cleaning the containment pan will be managed in accordance with Section B of this policy.

e. Transportation.

(1) New York State has not adopted the CE for transportation of WMM, and therefore, transportation of WMM must be in accordance with 6 NYCRR 374-1.13. All waste military munitions must be manifested as HW before transporting. A manifest is not required for transportation of waste munitions between contiguous areas of West Point.

(2) Transportation of all WMM off the installation will be coordinated with the EMD in accordance with Section D.

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8. Universal Waste. Universal wastes are HWs that may be managed under simplified requirements. Universal wastes at West Point include some types of batteries and fluorescent light tubes. Personnel who manage Universal Waste will comply with the following:

a. Fluorescent Light Bulbs.

(1) Fluorescent light bulbs will be collected in fiberboard drums supplied by the SWMB. Drums will be kept closed unless lamps are being added or removed.

(2) Broken lamps will be immediately cleaned up and put into a sealed plastic bag before being placed in the fiberboard drum.

(3) Drums will be labeled "Universal Waste Lamps," "Waste Lamps" or "Used Lamps" and the date accumulation began.

(4) Fluorescent light bulbs will not be accumulated for more than one year.

(5) When containers are full, or every 11 months, generators will contact the SWMB for removal.

b. Batteries.

(1) Batteries that must be managed in accordance with this policy include nickel cadmium, mercury, and some types of lithium batteries. Normal household batteries are not considered hazardous waste and may be disposed of with regular garbage.

(2) Batteries will be collected in containers or on spill pallets.

(3) Batteries that show evidence of damage or leaking will be stored in closed containers.

(4) Containers and spill pallets will be compatible with the contents of the battery and capable of containing any leaks.

(5) Spills will be immediately cleaned up and placed in a closed container. Spill cleanup debris will be managed as a HW in compliance with Section A of this policy.

(6) Containers or pallets will be labeled "Universal Waste Batteries," "Waste Batteries" or "Used Batteries" with the date accumulation began.

(7) Batteries will not be accumulated for more than one year.

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c. Training.

(1) Employees who handle or manage Universal Waste will be trained in the requirements of this chapter. Activities will contact the EMD to receive a briefing.

(2) New employees will not work unsupervised until they have been trained.

9. Used Oil. Used oil will be accumulated in accordance with this Chapter. Used oil that is properly managed is not regulated as a HW. Used oil that is mixed with a HW must be managed in accordance with the requirements of Chapter 3. Care shall be taken to ensure used oil does not become mixed with other chemicals.

a. Site Requirements.

(1) Used Oil generators are subject to the requirements of the Installation Spill Contingency Plan.

(2) Used Oil containers are required to have secondary containment when required by regulation, or to prevent a release to the environment, and spill cleanup kits.

b. Container Maintenance. Containers and above ground tanks used to store used oil at generator facilities must be:

(1) In good condition and not leaking.

(2) Repair or replace any damaged containers immediately.

(3) Spills must be cleaned up immediately.

c. Container Labels.

(1) Containers and above ground tanks used to store used oil must be labeled or marked clearly with the words "Used Oil."

(2) Fill pipes used to transfer used oil into underground storage tanks must be labeled or marked clearly with the words "Used Oil."

d. Turn-in Requirements.

(1) Generators will contact the SWMB to schedule a pickup when containers are full.

(2) Used oil will be analyzed for total halogen content before it is removed from the site. Used oil containing greater than 1,000 ppm total halogens will be managed as a HW in accordance with Section A of this policy.

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SUBJECT: Installation Hazardous Waste Management

10. Tritium Exit Signs. Tritium exit signs contain radioactive materials requiring special disposal. The West Point Safety Office has overall responsibility for the management of radioactive waste. DPW supports the program by removing and replacing signs and storing waste until disposal is arranged by the West Point Safety Office.

- a. DPW Electrical Shop removes sign from wall.
- b. Electrician records data from sign on spreadsheet at point of removal (Encl 4).
- c. Electrician brings signs to the SWMB for temporary storage.
- d. DPW -SWMB temporarily stores signs awaiting pick up.
- e. Electrician forwards spreadsheet to West Point Safety POC for coordination.
- f. West Point Safety Office POC coordinates pick up with Rock Island.
- g. Rock Island comes to West Point to pick up signs quarterly.

11. Spill Prevention, Control and Response. West Point activities that store or handle HW, universal waste or used oil will prepare for and respond to spills in accordance with the Installation Spill Contingency Plan and the Spill Prevention Control and Countermeasures Plan. The West Point Fire Department will immediately be notified (dial 911) in the event of a spill.

12. Updating the Installation Hazardous Waste Management Plan. This policy will be updated as appropriate and/or as operations and regulations change. Users are requested to send comments and suggested improvements on DA Form 2028 (Recommend Changes to Publications and Blank Forms) to DPW, ATTN: IMML-PWE.

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SUBJECT: Installation Hazardous Waste Management

ACRONYMS/ABBREVIATIONS

AR	- Army Regulation
CDL	- Commercial Drivers License
CE	- Conditional Exemption
CFR	- Code of Federal Register
DA	- Department of the Army
DDESB	- Department of Defense Explosive Safety Board
DPW	- Directorate of Public Works
DOD	- Department of Defense
DODAC	- Department of Defense Ammunition Codes
LRC	- Logistics Readiness Center
DOT	- Department of Transportation
DPTMS	- Directorate of Plans, Training, Mobility and Security
DRMO	- Defense Reutilization and Marketing Office
EMD	- Environmental Management Division
EEB	- Environmental Engineering Branch
EOD	- Explosive Ordnance Disposal
EPA	- Environmental Protection Agency
EPAS	- Environmental Performance Assessment System
EQCC	- Environmental Quality Control Committee
FSC	- Federal Supply Class
HQDA	- Headquarters Department of the Army
HW	- Hazardous Waste
IAW	- In Accordance With
LDR	- Land Disposal Restrictions
MEDDAC	- Medical Department Activity
MP	- Military Police
MSDS	- Material Safety Data Sheet
NSN	- National Stock Number
OSHA	- Occupational Safety and Health Administration
POC	- Point of Contact
RCRA	- Resource Conservation and Recovery Act of 1976
SAP	- Satellite Accumulation Point
SJA	- Staff Judge Advocate
SOP	- Standard Operating Procedure
SWMB	- Solid Waste Management Branch
TSDf	- Treatment, Storage, or Disposal Facility
UN	- United Nations
USMA	- United States Military Academy
WMM	- Waste Military Munitions

Encl 2

IMML-ZA

SUBJECT: Installation Hazardous Waste Management

HAZARDOUS WASTE <180-DAY ACCUMULATION SITE
WEEKLY REPORT

LOCATION: <180-DAY ACCUMULATION SITE

DATE: SIGNATURE:

Storage Containers

Criteria	Yes	No	Comments
Containers in good condition (damage, corrosion, deformation) 6 NYCRR 373-3.9 (b)			
Containers compatible with wastes 6 NYCRR 373-3.9(c)			
Containers closed 6 NYCRR 373-3.9(d)(1)			
Containers properly labeled 6 NYCRR 373-3.9(d)(3)			
Containers dated 6 NYCRR 372.2(a)(8)(ii)			

Site Specifics

Criteria	Yes	No	NA	Comments
Secondary containment West Point Policy #26				
Incompatible wastes separated by berms 6 NYCRR 373-3.9 (g)(3)				
Emergency eyewash/shower 29 CFR 1910.151				
Fire extinguisher 6 NYCRR 373-3.3(c)(3)				
Spill kit 6 NYCRR 373-3.3(c)(3)				
Warning signs posted 6 NYCRR 373-1.1 (d)(1)				
Access points secure West Point Policy #26				

Additional Comments

INSTRUCTIONS: Submission of this form is required on a weekly basis. Place an 'X' in the appropriate column. An "X" in a shaded column indicates a violation/problem. If you indicate any violations/problems or have questions concerning this form, please call the Solid Waste Management Branch at 938-2477. Please send completed forms through the mail distribution system (ATTN: IMNE-MIL-PWE-H) or by fax (938-4277).

(Revised 2/05)

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TRITIUM EXIT SIGN DATA SHEET

Manufacturer	Model Number	Date of Manufacture	Serial Number	Activity (Ci)	POC	Alt POC	Location
Isolite	2000	Feb-93	A32151	7.5	Frank Piccone x4074	Rich Anderson x6136	HAZMAT storage

Encl 4