



STATE OF NEW YORK  
DIVISION OF MILITARY AND NAVAL AFFAIRS  
**NEW YORK NAVAL MILITIA**  
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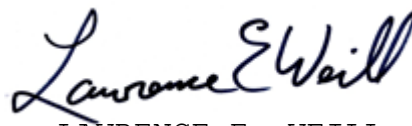
NYNMINST 9510.1A  
4 August 2022

NEW YORK NAVAL MILITIA INSTRUCTION 9510.1A

Subj: HAZARDOUS MATERIAL AND WASTE MANAGEMENT PLAN

Encl: (1) New York Army National Guard Hazardous Material and  
Waste Management Plan

1. PURPOSE. To promulgate guidance for the management of hazardous material (HAZMAT) and hazardous waste (HAZWASTE) in the New York Naval Militia.
2. CANCELLATION. This instruction supersedes NYNMINST 9510.1 of 9 DEC 15.
3. ACTION. The New York Naval Militia adopts the New York Army National Guard Hazardous Material and Waste Management Plan, and is included as enclosure (1) for use by all members. Where reference is made to the Army National Guard or NYARNG, substitute Naval Militia or NYNM as appropriate.

  
LAWRENCE E. WEILL

New York  
Army National Guard

# Hazardous Material and Waste Management Plan



**New York  
Army National Guard**

# **Hazardous Material and Waste Management Plan**



**June 2022**

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# Chapter 1 Introduction

This Hazardous Materials and Waste Management Plan (HMWMP or Plan) prescribes responsibilities, policies, and procedures for storing and managing hazardous materials (HMs) and wastes within the New York Army National Guard (NYARNG). Required by Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, this Plan is written to ensure NYARNG compliance with applicable Federal, State, and local laws and regulations. This Plan supersedes the NYARNG HMWMP dated January 2015.

This Plan includes easy-to-follow procedures and plenty of visual cues. To use the Plan, look on the front cover to see what chapter contains the information you need, and then flip to the tab for that chapter.

## Purpose and Scope

This Plan documents the NYARNG hazardous material (HM) and waste management program. It applies to the following:

- All activities under the command of the NYARNG.
- Any other activity that disposes of waste while using NYARNG training sites.
- Training conducted outside of New York or on active duty installations within the state, unless the standard operating procedure (SOP) for the host activity dictates otherwise.

**At locations where the host activity provides HM and waste management procedures, this Plan and the procedures prescribed may be used as best management practices (BMPs); as long as the procedures in this Plan do not conflict with the host activity procedures. Locations where this may apply include:**

- MATES at Ft. Drum; Ft. Hamilton
- The Army Aviation Support Facilities (AASFs);
- Field Maintenance Shop (FMS) 5 at the Hancock Field Air National Guard Base in Syracuse;
- The United States Property and Fiscal Office (USP&FO) warehouse at the Watervliet Arsenal.

## Reviews and Revisions

The Hazardous Waste Manager (HWM) will review this Plan at least once every two-five years and will modify material and waste handling procedures as necessary. All Unit Environmental Compliance Officers (UECOs), Facility Environmental Compliance Officers (FECO), Hazardous Waste Handlers, as well as any other NYARNG personnel directly involved in HMs or waste management, are encouraged to provide comments and input to this Plan. The Environmental Program Manager (EPM) of the NYARNG will review and approve changes to the Plan. If you have any suggested changes to this

document, e-mail the suggested changes to the State HW Manager at [heidi.m.unwin.nfg@army.mil](mailto:heidi.m.unwin.nfg@army.mil) or contact by telephone (See Table 1-3).

## **Applicable Regulations**

### **Federal Regulations**

To adhere to the Federal Facilities Compliance Act, the NYARNG must manage its waste in accordance with (IAW) the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). The Federal Facilities Compliance Act, also a RCRA amendment, further requires that all Department of Defense (DoD) installations comply with federal hazardous waste (HW) laws and regulations.

Federal waste management regulations are codified in Title 40 of the Code of Federal Regulations (40 CFR). This Plan provides procedures for complying with the following parts of 40 CFR:

- Parts 260 through 272 for the regulation of HW.
- Part 273 for the regulation of universal waste (UW).
- Part 279 for the regulation of used oil.

The NYARNG must also comply with the following:

- 49 CFR Parts 170 through 177 regarding HM transportation.
- 29 CFR Part 1910 regarding Occupational Safety and Health Administration (OSHA) requirements.

### **State Regulations**

The New York State Department of Environmental Conservation (NYSDEC) is authorized to implement the Resource Conservation and Recovery Act (RCRA) program for NYS in lieu of the USEPA (Environmental Protection Agency). As an authorized agency, DEC adopts and enforces regulations, issues permits, conducts inspections, provides technical assistance, and gathers and processes data related to Hazardous Waste Management in NY. NYARNG must comply with New York Environmental Conservation Rules and Regulations, Title 6 of the Official Compilation of Codes, Rules, and Regulations.

### **Military Regulations**

The NYARNG must comply with AR 200-1, *Environmental Protection and Enhancement*, which contains Army policy for HM and waste management. Specifically, this Plan provides procedures for complying with two chapters of AR 200-1: Chapter 9, “Materials Management” and Chapter 10, “Waste Management”. Table 1-1 cross-references the major program requirements of AR 200-1 with this Plan. In addition, the NYARNG must comply with Department of Defense (DoD) Regulation 4500.9-R,

known as the Defense Transportation Regulations (DTR) when transporting HM across public roadways.

**Table 1-1: Program Requirements of AR 200-1**

<b>AR 200-1 Reference</b>	<b>Major Program Requirement</b>	<b>Plan Reference</b>
9-1 a (1)	Hazardous Material (HM) Management Program	Chapter 3
9-1 a (3)	HM Inventory	Chapter 2
9-1 d (1)	Transporting HM	Chapter 6
9-1 d (1)	Designing Storage for HM	Chapter 2
9-1 (d)	Disposing of HM	Chapters 4,5,6
9-1 (d)	Managing Excess HM	Chapters 2,3,4,5
9-1 a (5)	HM Not Owned by the Army	Chapter 3
9-1 a (4)	Using Pesticides	N/A
9-1 a (3)	BMPs	Throughout this Plan
9-1 a (3)	Credit Card Purchases	Chapter 3
10-1 d (3)	Cradle-to-Grave Tracking	Chapter 3
9-2 c	Polychlorinated Biphenyl (PCB) Management	Chapter 3
10-1 a (2)	Hazardous Waste (HW) Regulatory Compliance	Chapters 3,4,5
10-1 d (3)	Local Procedures and Responsibilities	Chapter 1
10-1 a (5)	Minimizing Waste by Preventing Pollution	Chapter 7
10-1 a (6)	Prohibition on HW Storage in Underground Storage Tanks (USTs)	Chapter 4
10-2 a (5)	Waste Accumulation, Storage, and Transfer Facilities	Chapters 3 , 4
10-1 b, 10-1 d (1)	RCRA Compliance Waste Streams	Chapter 4
10-1 d (3)	HW Inventory	Chapter 3
10-1 d (3)	Transporting HW	Chapter 6
10-2 d (9)	Disposing of HW	Chapters 4,6
10-1 d (2)	Solid and HW Training	Chapter 8
9-1 a (4)	Disposing of Samples or Waste Pesticides and Pesticide Containers	Chapter 3

### Local Regulations, Ordinances, and Codes

AR 200-1 requires compliance with local environmental regulations. Consult the HWM regarding local regulations. In the absence of specific regulations, use BMPs to minimize the amount of HMs released to the environment.

### Contractual Obligations

The NYARNG routinely contracts for services related to environmental compliance such as waste transportation and disposal. The contracted services do not reduce NYARNG environmental liability, but simply provide a service. These contracts may include requirements that are more stringent than the regulations. The NYARNG will comply with all HW disposal contractor restrictions that do not violate any regulation, order, ordinance, code, or other regulatory requirement.

### Regulatory Agency Contacts

The following table lists federal and state agencies that regulate the NYARNG:

**Table 1-2: Regulatory Agency Contacts**

Agency	Title or Subject	Phone
Environmental Protection Agency (EPA) Region 2	RCRA Compliance Branch	(212) 637-3194
New York Department of Environmental Conservation (NYDEC)	Division of Solid and Hazardous Materials	(518) 402-8652
NYDEC	Pollution Prevention Program	(518) 402-9469
DOT-Federal Highway Administration & NYS Dept. of Transportation (DOT)	Federal Transportation Information & NYS DOT General Information	(518) 457-5672

## Environmental Office Point of Contacts

Table 1-3. Construction and Facility Management Office – Environmental Contacts

<b>Department of Military and Naval Affairs</b> <b>330 Old Niskayuna Road</b> <b>Latham, NY 12110-2224</b> <b>(518) 786-4400 (fax)</b>	
<b>Title</b>	<b>Commercial and DSN Phone Numbers</b>
Chief Environmental Compliance	(518) 786-4555 (telephone) 489-4555 (DSN)
Environmental Specialist II Compliance Division (Hazardous Waste Manager)	(518) 786-4347 (telephone) 489-4347 (DSN)
Environmental Protection Specialist	(518) 786-4367 (telephone) 489-4367 (DSN)
Environmental Technical Support Specialist	TEMP- (518) 786-6165 (telephone) 489-6165 (DSN)
Environmental Audits Manager	(518) 786-4318 (telephone) 489-4318 (DSN)

## Safety Office Point of Contacts

Table 1-4. (Dept. of Military and Naval Affairs – Occupational Safety) – Points of Contact

<b>Division of Military and Naval Affairs</b> <b>330 Old Niskayuna Road</b> <b>Latham, NY 12110-2224</b> <b>(518) 786-6032 (fax)</b>	
<b>Title</b>	<b>Commercial and DSN Phone Numbers</b>
Safety and Occupational Health Manager	(518) 786-6097 (Commercial) 489-6097 (DSN)
Occupational Health Specialist	(518) 786-4329 (Commercial) 489-4329 (DSN)
Safety Specialist	(518) 786-4800 (Commercial) 489-4800 (DSN)
Safety Specialist	(518) 786-6121 (Commercial) 489-6121 (DSN)
Safety Specialist	(518) 786-6040 (Commercial) 489-6040 (DSN)

## **Description of NYARNG Operations**

The New York State Division of Military and Naval Affairs (NYS DMNA) provides organized, trained, and equipped NYARNG units to execute assigned state and federal missions. The federal mission of the NYARNG is to provide combat-ready forces to mobilize in support of National Military Strategy. Secondly, the NYARNG protects life and property and preserves peace, order, and public safety under state authorities.

The NYARNG manages training sites and maintains military vehicles and equipment. This includes operating surface maintenance facilities (MATES, Combined Support Maintenance Shop-CSMS, CSMS Sub Shops, and FMSs), Army Aviation Support Facilities (AASF), Armories, and other facilities throughout the state.

## **Responsibilities**

### **The Adjutant General (TAG)**

- a. Ensures that NYARNG facilities comply with this Plan.
- b. Establishes and chairs the Environmental Quality Control Committee (EQCC).
- c. Ensures that an Environmental Policy and Environmental Management System (EMS) are in place and facilitated.

### **Chief of Staff**

- a. Ensures that each Activity and Unit Commander designate an Environmental Compliance Officer (ECO) to implement this Plan.

### **Director of Army Logistics and Surface Maintenance (ALSM)**

- a. Participates as a member of the EQCC.
- b. Appoints, as an additional duty, a Facility Environmental Compliance Officer (FECO) for each surface facility and forwards a letter of assignment to the Environmental Office.
- c. Reviews ongoing NYARNG logistical plans, operation activities, and any proposed changes for compliance with this Plan.
- d. Coordinates NYARNG logistical regulations and SOPs to ensure that logistical policies and procedures are compatible with this Plan.
- e. In conjunction with the Environmental Office and State Safety Office (SSO), ensures availability of personal protective equipment (PPE) to safeguard employees who handle HW or HM.
- f. Monitors the work environment and management practices in maintenance facilities to ensure that personnel are safe and HWs are properly managed.
- g. Promotes recycling and pollution prevention.



### **State Army Aviation Officer (SAO)**

- a. Participates as a member of the EQCC.
- b. Appoints, as an additional duty, an FECO for each aviation facility and forwards a letter of assignment to the Environmental Office.
- c. Reviews ongoing NYARNG logistical plans, operation activities, and any proposed changes for compliance with this Plan.
- d. Coordinates NYARNG aviation regulations and SOPs to ensure that aviation policies and procedures are compatible with this Plan.
- e. In conjunction with the Environmental Office and SSO, ensures availability of PPE to safeguard employees who handle HW or HM.
- f. Monitors the work environment and management practices in maintenance facilities to ensure that personnel are safe and HW are properly managed.
- g. Promotes recycling and Pollution Prevention (P2).

### **Director Operations, Training, and Readiness**

- a. Participates as a member of the EQCC.
- b. Reviews NYARNG SOPs and training plans for compliance with this Plan.
- c. Ensures that all NYARNG training sites, ranges, and facilities operate in compliance with this Plan.
- d. Schedules soldiers for training sessions outlined in this Plan for M-Day troops.

### **Facilities Management and Engineering Environmental Compliance Office**

- a. A delegate participates as a member of the EQCC.
- b. Executes this Plan.
- c. Prepares a plan and timeline for improving facilities that do not meet the requirements of this Plan.
- d. Coordinates the HW management program.
- e. Provides regulatory and technical support and assistance as required.
- f. Schedules compliance inspections of facility HW operations.
- g. Maintains all environmental records and documentation.

### **Environmental Program Manager (EPM)**

- a. Participates as a primary member of the EQCC.
- b. Provides regulatory agency personnel access to activities, except for reasons of national security or personal safety.
- c. Directs and monitors implementation of this Plan.
- d. Serves as advisor to TAG, Deputy Adjutant General, the Chief of Staff and NYARNG on this Plan.
- e. Acts as Program Manager for the HW management budget and executes funds as required.
- f. Budgets the funding necessary for all environmental training.
- g. Establishes, maintains and provides guidance and implementation of EMS.

### **Hazardous Waste Manager (HWM)**

- a. Serves as an advisor to the EQCC and the EPM.
- b. Serves as liaison to federal, state, and local regulatory agencies regarding waste management issues.
- c. Conducts environmental training for UECOs and FECOs.
  - Works directly with UECOs and FECOs to provide technical assistance, including HM and waste management.
  - Advises UECOs and FECOs of local regulations or contractor requirements that may be more stringent than the requirements of this Plan.
- d. Coordinates HW management programs, plans, and regulations for NYARNG, including;
  - Prepares all waste-related reports required by federal, state, and local regulations and NYARNG policies.
  - Ensures that hazardous waste is only transported to permitted TSDFs.
  - Arranges for waste sampling and analysis as needed.
  - Classifies waste not listed in the Waste Protocol Sheets (WPSs) IAW NYDEC Hazardous Waste Regulations.
  - Assists FECOs with the identification of proper descriptions to be used on labels and HW manifests and proper marking and labeling for each type of waste.
  - Obtains EPA identifications numbers for NYARNG HW generators.
  - Maintains records of all HW disposal records.
  - Receives unit and activity turn-in documents for HW.
  - Updates this Plan as necessary.
- e. Conducts scheduled compliance inspections at applicable facilities that store, use, or handle HMs or HW.
- f. Establishes policies for identifying, procuring, and tracking HMs.
  - Reviews in advance all service contracts for HM procurement, including contracts for parts-cleaning solvents and parts washers.
- g. Organizes and implements P2 methods and programs.
  - Reviews HM inventories to identify opportunities to substitute less hazardous or non-hazardous materials when practical.
  - Prepares all solid waste and P2 reports required by federal, New York, and local regulations and by NYARNG policy.
  - Reviews the types and quantities of waste generated and evaluates the potential for reducing waste toxicity and quantity.
- h. Serves as an advisor to the EPM regarding programs and procedures in support of the EMS.

### **United States Property and Fiscal Office (USP&FO)**

- a. Ensures that all federally-owned usable property is turned into Defense Reutilization Marketing Service (DRMS) including such items as tires, scrap metal, computers, fire extinguishers, and exit signs.
- b. Implements procedures, materials, and equipment that minimize HW.

### **State Safety Officer (SSO)**

- a. Assists UECOs and FECOs with safety aspects of this Plan.
- b. Approves new chemical storage rooms, warehouses, and racks.
- c. In coordination with the Environmental Office, the Director of ALSM, and the SAO, prescribes PPE to safeguard employees who handle hazardous chemicals and wastes.
- d. Ensures compliance with state and local Fire Marshal requirements.

### **State Facility Operations Branch – Armories**

- a. Ensure state facility personnel, including state District Managers, coordinate with UECOs at state facilities.
- b. Implements procedures, materials, and equipment that minimize HW.
- c. Functions as a liaison on all environmental issues between state facility personnel and the HWM.

### **Facility Environmental Compliance Officer (FECO) (Maintenance Facilities including FMSs, AASFs, MATES, CSMs, and CSMS Sub Shops)**

- a. Implements the procedures established by this Plan.
- b. Functions as a liaison on all environmental issues between the facility and the HWM.
- c. Provides briefings to facility personnel on this Plan.
- d. Notifies the HWM of changes to operations, including process changes, new waste streams, materials used, materials stored, and effective environmental product alternatives.
- e. Promotes P2, recycling, and solid waste management.
- f. Orders supplies and equipment necessary for personnel safety and management of HW.
- g. Prepares, submits, and maintains all required reports, forms, and records.
- h. Reviews HW manifests prepared by the contractor for accuracy before signing as the generator.

### **Unit Environmental Compliance Officer (UECO) (NYARNG Units)**

- a. Implements the procedures established by this Plan.
- b. Coordinates with the co-located FMS FECO on collecting and segregating hazardous and non-hazardous waste.
- c. In coordination with the co-located FMS FECO, labels and marks containers.
- d. Coordinates cooperative turn-in of waste into co-located FMS.

- e. Promotes P2, recycling, and solid waste management.

### **Unit Commanders**

- a. Assigns support staff as primary UECO for each unit at that location.
- b. Provides the EPM with written notice of assignment changes within 10 days of the effective date of assignment.
- c. Ensures that the UECO participates in HW training within six months of assignment.
- d. Ensures UECO receive Environmental Awareness Training.
- e. Ensures adequate availability of protective clothing and gear as requested by the SSO.
- f. Promotes P2, recycling, and solid waste management.

### **Camp Smith Post Commander**

- a. Ensures full time environmental employee oversees environmental concerns for both Camp Smith and tenant activities on Post.
- b. Assigns UECO to oversee environmental concerns for tenant activities at Camp Smith.
- c. Assures that every tenant has an environmental point of contact.

### **Officer in Charge and Control (OIC&C)**

- a. At multi-unit armories, the OIC&C will appoint an overall Facility Coordinator.

# Chapter 2 Setting Up Storage Areas for Hazardous Materials

*Reference: Joint Service Manual DLAI 4145.11/TM38-410/NAVSUP PUB 573/AFJMAN 23-209/MCO 4450.12A, Storage and Handling of Hazardous Materials; NYARNG Regulation 385-9, Safety and Occupational Health Hazard Communication Program; DLAI 4145.25/AR 700-68/NAVSUPINST 4440.128D/AFJMAN 23-227(I)/MCO 10330.2D, Storage and Handling of Liquefied and Gaseous Compressed Gases and Their Full and Empty Cylinders; 19 NYCRR-1222-FCNYS, NYS Fire or Building Code of NY.*

Whether checking-in new HM products or maintaining existing stocks, the UECO or FECO must ensure HMs are properly stored to minimize hazards to personnel and property. HMs can be stored in storage lockers, storage rooms, separate buildings, warehouses, or racks. In addition, there are special guidelines for storing compressed gases. This chapter provides guidance on how to set up storage lockers, storage rooms and warehouses, and storage racks. When setting up storage lockers, rooms, warehouses, or racks, also refer to the [Hazardous Material Storage Compatibility Chart \(See Chapter 3, Table 3-1\)](#).

Follow the procedures outlined in Chapters 2 and 3 for HMs management. While each of the steps may not be required by regulation, they comprise a system that allows the user to prevent and/or reduce waste generation (i.e. P2), and ensures the safety of facility personnel working with HM. The procedures detailed in these chapters are not meant to supersede NYARNG Regulation 385-9, but are either based on that regulation or are meant to supplement the requirements.

***Note:** If a facility has an equivalent or more restrictive HMs management system in place (i.e., a pharmacy system), the established system should remain in effect. In addition, the concepts presented in these chapters can be used to manage items not typically stored in one of the discussed storage areas, such as janitorial supplies.*

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## WARNING!

**ALL HM storage locations (rooms, warehouses) or placement of HM storage structures (lockers, buildings or racks) must be pre-approved by the State Safety Officer (SSO).**

**DO NOT** store tools or personal items in any HM storage location.

**DO NOT** store combustible materials other than original packaging, such as cardboard, paper, or rags with flammable HM.

**DO NOT** store flammable or reactive HM within 50 feet of the property boundary.

**DO NOT** store HM in trailers, vehicles, personal wall lockers, near floor drains, or in break rooms.

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**DO NOT** use wood to construct additional or replacement shelving. Shelving used for HM storage must meet the requirements of NFPA 30 Chapter 4 – Container and Portable Tank Storage.

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Select the appropriate type of storage location for your HMs:

- For *small quantities* or containers of commonly used hazardous chemicals, use lockers.
- For *larger quantities or containers* of hazardous chemicals, use HAZMAT buildings with built-in secondary containment, storage rooms, warehouses, or racks.

Be sure to keep all HM storage areas clean and orderly and to maintain all structural integrity and hardware, including doors, hinges, and shelves.

- Do not remove doors or ventilation bungs, penetrate the wall, modify ventilation, or otherwise modify HM storage areas.
- Keep doors closed when HMs are not being transferred in or out of the area.
- As a BMP, remove items from original packaging (boxes) before placing them in flammable storage lockers. Containers of flammable HMs should not be kept in cardboard boxes when stored in storage lockers.

### **General Management Requirements (for all HM Storage Areas)**

- STEP 1. Perform an inventory at least once per year of each HM storage area (See Chapter 3, Figure 3-7).
- STEP 2. Using the inventory information obtained in Step 1, ensure a SDS has been obtained and is maintained for each HM in storage and a copy has been incorporate into the facility's OSHA Hazard Communication (HazCom) Program and Right-to-Know Binder. (See Chapter 3 for additional guidance on how to set up the binder).
- STEP 3. As part of the inventory process, inspect, extend, or turn-in any materials that are out of shelf-life compliance or otherwise unserviceable. (See Chapter 3, Figure 3-7).
- STEP 4. See Chapter 3 for guidance on how to set up the OSHA HazCom Right-to-Know Binder.
- STEP 5. Ensure that all materials in each HM storage area are compatible with the other materials stored within, (See Table 3-1).
- STEP 6. Post a copy of the completed inventory form on the outside of the door to each HM storage area.
- STEP 7. Post warning signs as recommended for each type of storage area.



**Note:** Do not place unauthorized signs, labels, stickers, or markings on lockers or other HM storage areas (rooms, buildings or racks).

## Storage Lockers

Use storage lockers in the work area to store daily amounts of commonly used HM, such as grease tubes, quart oil cans, aerosol cans, etc. All storage lockers should be approved by the National Fire Protection Association (NFPA).

The locker color depends on the HM being stored. If you have an older version of a locker, you are not required to repaint it.

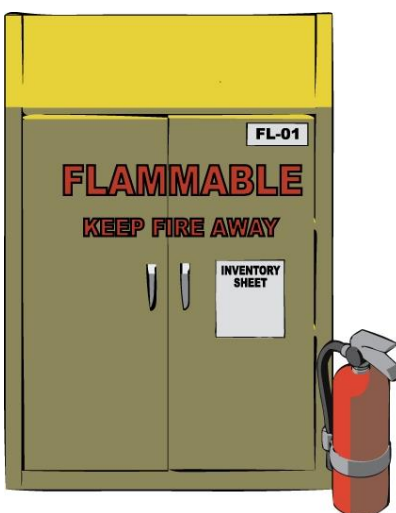
**Table 2-1: Locker Types and Typical Colors**

HM Type	Locker Color
Flammables	Yellow
Corrosives	Blue
Oxidizers	Red

To set up a HM storage locker complete the following steps:

- STEP 1. Use the following guidelines to select a location for the locker:
- Locate the locker indoors in a well-ventilated area near where the HM will be used, or outdoors under cover.
  - Maintain easy access to the locker, do not block doors.
  - Do not place the locker near doors, break rooms, bathrooms, offices, or other occupied non-shop areas.
  - Do not place the locker near floor drains, drainage channels, or areas with high foot or vehicle traffic.
- STEP 2. If you have more than one storage locker for the same types of HM, you should assign a four-character identifier to each locker and mark it on the front top right corner. This identifier will consist of one of the three abbreviations listed below used to differentiate locker contents and a two-digit sequential number (e.g., FL 01, FL 02, etc). This number is needed for inventory purposes:
- FL – Flammable lockers
  - CL – Corrosive lockers
  - OL – Oxidizer lockers

**Figure 2-1: Flammable HM Storage Locker**

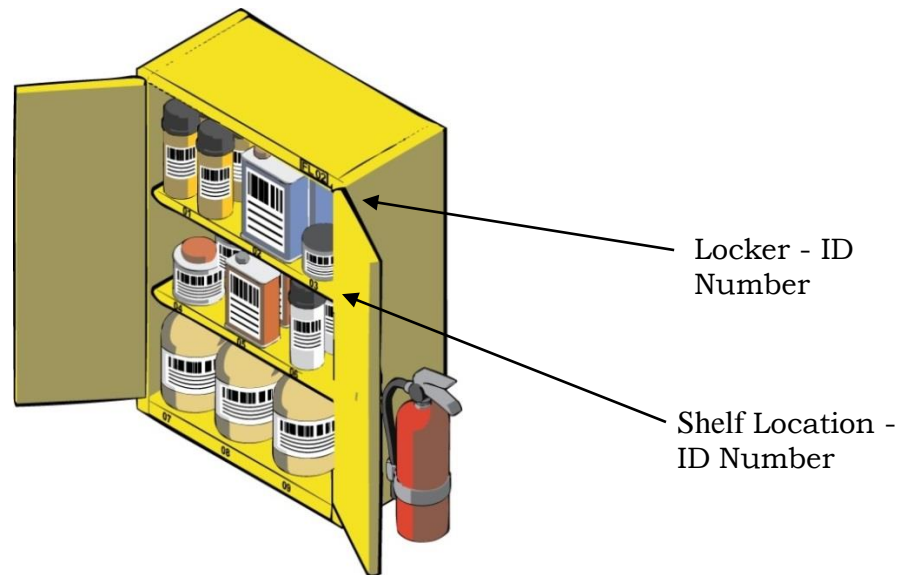


**Note: DO NOT** use a storage location identifier number more than once in the same facility. If sharing an area with another activity, coordinate numbers to avoid using the same identifier numbers.

- STEP 3. Ensure that an ABC-rated fire extinguisher and spill-response equipment are located nearby.
- STEP 4. Conspicuously post the following warning on each flammable HM storage locker; **“Flammable – Keep Away from Open Flame”**. [OSHA 1926.152(b)(2)(iii)]
- STEP 5. Organize the locker as noted below:
- Determine how much space you will need for each HM.
  - Ensure materials within the locker are orderly and that no containers are open.
  - Mark the storage locations on each shelf with a unique shelf number along the bottom edge of each shelf. (Use a stencil or permanent marking pen).
- STEP 6. Assign a Storage Location Number (SLN) to each container, using the four-digit locker number and shelf location number (xx-xx and yy; where xx-xx is the four-digit alpha-numeric locker number and yy is the shelf location number). *Example: FL-02 03 (Flammable Locker 02, Shelf Location 03), (See Figure 2-2).*



**Figure 2-2: Storage Locker Showing Shelf Numbering**



## **Storage Rooms, Buildings and Warehouses**

To set up a storage room or warehouse, complete the following steps:

- STEP 1. Have the SSO or designated representative approve the location you choose.
- STEP 2. Room or building selected must provide secondary containment as required by AR 200, Chapter 4 Hazardous Materials Management 4-3(3)(d).

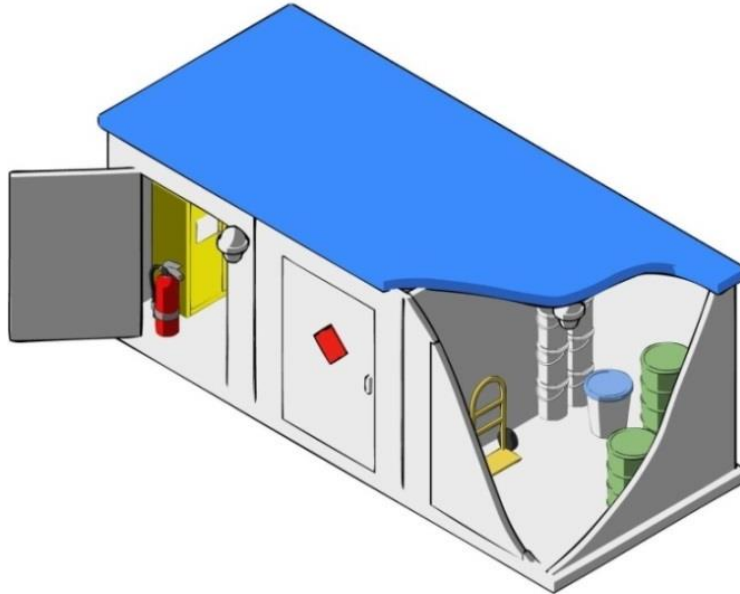
**Note:** *The room floor space itself usually provides enough secondary containment; however a spill of HM stored inside must not escape the room. Equip doors with sealed thresholds and/or store small containers of liquid HMs in pans or tubs on the shelf. When using the second option, the HM must be compatible with the container (for example, store acids in corrosion-proof plastic tubs).*

- STEP 3. Ensure that an ABC-rated fire extinguisher and spill-response equipment are located nearby.
- STEP 4. Assign a four-character identifier to the room or building and mark it on all doors to the room. This identifier will consist of one of the two abbreviations used to identify a storage room or storage building and a two-digit sequential number (e.g., SB 01). The number is needed for inventory and inspection forms. Ensure the HM storage is clean and organized and that all materials are compatible.
  - SR – Storage Room
  - SB – Storage Building

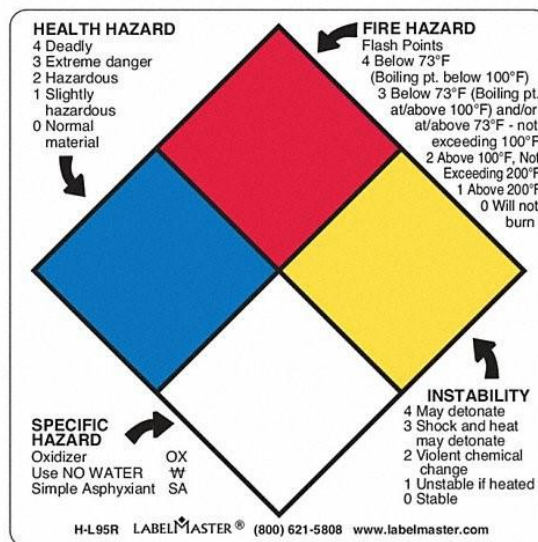
STEP 5. Conspicuously post the following warnings on each room or building used to store HMs;

- **“Flammable – Keep Away from Open Flame”**
- **“No Smoking within 50 Feet”**
- **NFPA Diamond Placard with Number Ratings for Health, Flammability and Reactivity Hazards for HMs Stored Inside, (See Figure 2-4).**

**Figure 2-3: HM Storage Building**



**Figure 2-4: National Fire Protection Agency (NFPA) Diamond Placard**

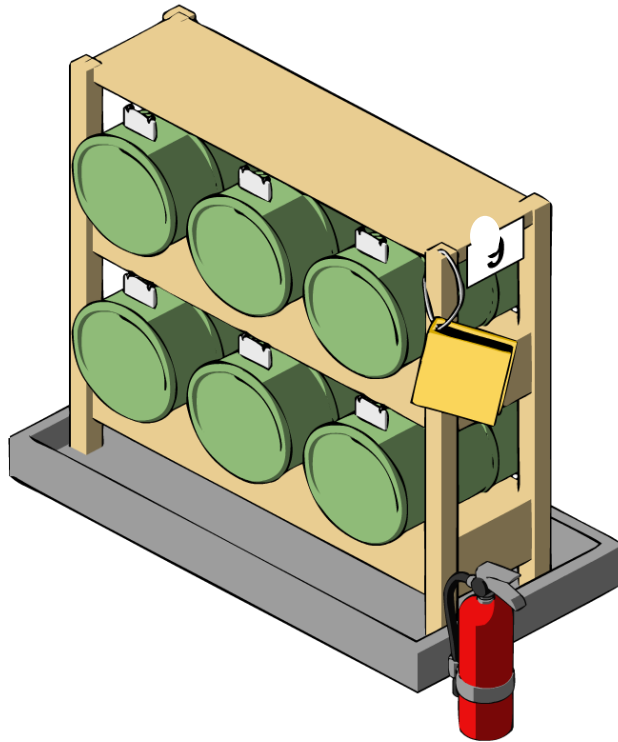


## Storage Racks

To set up a storage rack, complete the following steps:

- STEP 1. Have the SSO approve the location before use.
- STEP 2. Provide secondary containment under the storage rack (See Figure 2-5) as required by AR 200-1, 4-3 (3)(d).
- STEP 3. Ensure that an ABC-rated fire extinguisher and spill-response equipment are located nearby.
- STEP 4. Conspicuously post the following warnings on each rack used to store HMs;  
**“Flammable – Keep Away from Open Flame”**
- STEP 5. Assign a four-character identifier to the rack and mark it on the rack or on a sign posted on the rack. The number is needed for inventory and inspection forms.

Figure 2-5: Storage Rack



## Storage for Compressed Gas Cylinders

When storing compressed gases, excluding fire extinguishers and aerosol cans, additional guidelines must be followed. A compressed gas is a gas that is packaged under charged pressure. Because compressed gases are under pressure, handle such gases with extreme care, particularly the flammable and explosive gases.

**Figure 2-6: Compressed Gas Cylinder Storage**



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**CAUTION**

**DO NOT** use cylinders as rollers or supports, or for any other unintended purpose.  
**DO NOT** accept, issue, or use a cylinder unless the contents are identified and in good condition.

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The SSO is responsible for designing and approving compressed gas storage areas. The guidelines listed below will help you maintain those areas properly to protect human health and the environment.

- Ensure only non-combustible or limited-combustible materials are used for shelves, racks, and floors.
- Ensure the area is well-ventilated (complete change of air at least six times each hour).
- Separate storage facilities from other buildings by at least 50 feet.
- Store gases that support combustion in different sheds separated by 50 feet.
- Keep dry vegetation and combustible materials at least 15 feet away from storage areas.
- Keep cylinders out of the sun and off the ground (earth).
- Protect storage areas from vehicular traffic.
- Lock storage areas to prevent unauthorized entry.
- Post NO SMOKING signs.

- Do not allow open flames within 50 feet.
- Place hazard identification signs such as FLAMMABLE at all entrances.
- Ensure all cylinders are properly labeled (do not alter or remove the manufacturer's label from cylinders).
- Store cylinders with the valve protection cap secured.
- Store cylinders you are using or storing so they do not fall over.
- Store liquefied flammable gas cylinders upright or so the pressure-relief valve directly communicates with the vapor space of the cylinder.
- Ensure cylinders are not located where they could become part of an electrical circuit.
- Segregate incompatible or combustible materials by at least 20 feet (see "Determining Hazardous Material Compatibility" in this chapter for more information).
- Isolate incompatible or combustible materials with a barrier of non-combustible material at least five feet high and with a minimum fire resistance rating of 30 minutes.

### **Moving Cylinders**

If you move cylinders, note the following precautions:

- Close cylinder valves before moving cylinders.
- Do not lift cylinders by the valve protection cap.
- Do not lift cylinders by cranes or mechanical lifts unless fastened in proper containers, racks, and cradles.
- Do not use rope and chain slings or electromagnets to lift cylinders.
- Only handle, ship, or store cylinders if they have valve protection caps.

The following items do not require valve protection caps:

- Small cylinders with a capacity of less than 40 pounds
- "Ram-bottom" type cylinders
- Cylinders with less than 625 cubic inches of volumetric capacity, such as medical gases

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	<b>Self Inspection Checklist- Gas Cylinders</b>	<b>Please Circle</b>	<b>Comments</b>
	<b>Storage</b>		
1	Are cylinders stored in upright positions and immobilized by chains or other means to prevent them from being knocked over?	<b>Y N N/A</b>	
2	Are Cylinders stored away from highly flammable substances such as oil, gasoline, or waste?	<b>Y N N/A</b>	
3	Are cylinders stored away from electrical connections, gas flames or other sources of ignition, and substances such as flammable solvents and combustible material?	<b>Y N N/A</b>	
4	Are flammable gases separated from oxidizing gases in storage areas by a minimum of 20 ft? (separate acetylene & propane from oxygen cylinders)	<b>Y N N/A</b>	
5	Are storage rooms for cylinders dry, cool, and well-ventilated? (do not store in subsurface locations or near radiators)	<b>Y N N/A</b>	
6	Are cylinders stored away from incompatibles, excessive heat, continuous dampness, salt or other corrosive chemicals, and any areas that may cause them damage?	<b>Y N N/A</b>	
7	Is the storage area permanently posted with the names of the gases stored in the cylinder?	<b>Y N N/A</b>	
8	Are all compressed gas cylinder valve covers in place when cylinders are not in use?	<b>Y N N/A</b>	
9	Are all compressed gas cylinders stored so they do not interfere with exit paths?	<b>Y N N/A</b>	
10	Are cylinders always maintained at temperatures below 125 degrees F? (a flame should never come in contact with a gas cylinder)	<b>Y N N/A</b>	
11	Are charged or full cylinders labeled and <u>stored away</u> from EMPTY cylinders?	<b>Y N N/A</b>	
12	Is the bottom of the cylinder protected from the ground to prevent rusting?	<b>Y N N/A</b>	

	<b>Self Inspection Checklist- Gas Cylinders</b>	<b>Please Circle</b>	<b>Comments</b>
13	Are all compressed gas cylinders regularly inspected for corrosion, pitting, cuts, gouges, digs, bulges, neck defects and general distortion?	Y    N    N/A	
	<b><i>Labeling-</i></b>		
14	Is painting cylinders without authorization by owner prohibited? (Often color codes are used to help designate cylinders. Arbitrary paint is not recommended)	Y    N    N/A	
15	Do all compressed gas cylinders have their contents and precautionary labeling clearly marked on their exteriors?	Y    N    N/A	
	<b><i>Handling-</i></b>		
16	Is repair or alteration to the cylinder, valve, or safety relief devices prohibited? ( All alterations and repairs to the cylinder and valve must be made by the gas vendor)	Y    N    N/A	
17	Do all compressed gas cylinders have safety pressure relief valves?	Y    N    N/A	
18	Are all compressed gas cylinders subjected to periodic hydrostatic testing and interior inspection? (normally performed by the supplier)	Y    N    N/A	
19	Are safety devices in the valve or on the cylinder free from any indication of tampering?	Y    N    N/A	
20	Are cylinder valves closed at all times, except when the valve is in use?	Y    N    N/A	
21	Are compressed gas cylinders always moved, even short distances, by a suitable hand truck? (never drag cylinder across the floor/ground)	Y    N    N/A	
22	Is using wrenches or other tools for opening and closing valves prohibited? (Hammering valve wheels is prohibited)	Y    N    N/A	

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	<b>Self Inspection Checklist- Gas Cylinders</b>	<b>Please Circle</b>	<b>Comments</b>
23	Are suitable pressure regulating devices in use whenever the gas is emitted to systems with pressure-rated limitations lower than the cylinder pressure?	<b>Y    N    N/A</b>	
	<b><i>Handling continued -</i></b>		
24	Are compressed gas cylinders only handled by experienced and properly trained people?	<b>Y    N    N/A</b>	
25	Are all compressed gas cylinders regularly subjected to leak detection using an approved leak detecting liquid? (leak detection liquids are available from commercial welding supply houses)	<b>Y    N    N/A</b>	
26	Are all compressed gas cylinder connections such as pressure regulators, manifolds, hoses, gauges, and relief valves checked for integrity and tightness?	<b>Y    N    N/A</b>	
27	Are procedures established for when compressed gas cylinder leak cannot be remedied by simply tightening the valve?	<b>Y    N    N/A</b>	



# **Chapter 3    Managing Hazardous Materials**

This chapter provides aspects of managing hazardous materials, such as the hazardous materials management program, procuring hazardous materials, using Safety Data Sheets (SDSs), determining hazardous material compatibility, maintaining and extending shelf-life, completing shelf-life extension notice information, stocking hazardous materials, tracking inventory, and forms.

## **Hazardous Materials Management Program**

HM management is an integral part of the NYARNG P2 program because reducing or eliminating HM prevents those materials from entering the waste stream as HW. Therefore, minimizing the use of HM is the primary source reduction technique in the Hazardous Materials Management Program.

## **Procuring Hazardous Materials**

Facilities procure HM through the USP&FO, the International Merchants Purchase Authorization Card (IMPAC), or other open purchase arrangements. The UECO or FECO uses the following procedures to screen all HM procurements and requisitions, including materials purchased on the IMPAC card or through other open purchase arrangements.

Check current inventories to see if enough material is already available to meet the request. As a rule, the UECO or FECO should not authorize procurements or requisitions that will exceed the annual usage stocking limit (discussed in the [Maintaining and Extending Shelf-Life](#) and [Tracking Inventory](#) sections). Before ordering, check with other activities to see if they have excess HM on hand that you can obtain.

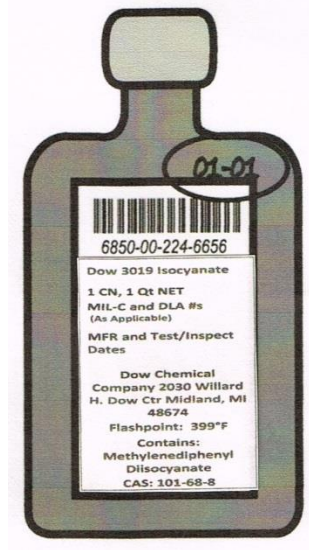
## **Using Safety Data Sheets (SDSs)**

Before using HMs, you should be familiar with associated hazards, specific handling procedures, and spill-response measures. This information is provided in the SDSs, which are available from the manufacturer. The Defense Logistics Agency (DLA) Hazardous Materials Information Resource System (HMIRS) is the central repository for SDS for the United States Government military services and civil agencies. An account is required to use this resource. To request an account go to [www.dlis.dla.mil/HMIRS/hmirs\\_registration\\_-gov.asp](http://www.dlis.dla.mil/HMIRS/hmirs_registration_-gov.asp). A [.mil] e-mail address is required. Commercial phone number is 877-352-2255/269-961-7791. Another option is to perform an online Internet search or manufacturers websites for all HMs. In order to use the HMIRS on-line, you must be a registered subscriber. You must have a SDS for every HM on hand, and have them readily accessible to all workers on all shifts.

To manage your SDSs complete the following steps:

STEP 1. Obtain a SDS for each HM on hand from the manufacturer, HMIRS, or other SDS source. The SDS must be specific to the product's NSN and CAGE number (manufacturer's code). These numbers are printed on the SDS and on the HM container. Alternative ways to find SDSs are listed below:

- General Services Administration (GSA) SDS Request Line (816) 926-5097 or DSN 465-5097, or e-mail [msds@gsa.gov](mailto:msds@gsa.gov)
- University of Vermont, Safety Information Research Institute (SIRI), <http://hazard.com/msds/index.php>



STEP 2. As a BMP, assign a Storage Location Number (SLN) to each HM container, (See Chapter 2) and write the SLN on the following items as shown in Figure 3-1:

- The SDS for that HM
- Every container of that HM
- Inventory sheet



## **Determining Compatible Storage for Hazardous Materials**

Using Table 3-1 and the SDS for each HM, determine what types of materials can be stored together and what types must be segregated. There are three methods that can be used to determine compatibility.























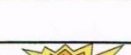



- Method 1: Using HMIRS SDSs
- Method 2: Using DOT Hazard Class Labels
- Method 3: Using OSHA GHS Precautionary Labels

### **Method 1: Determining Compatibility Using HMIRS SDSs**

The easiest way to determine compatibility is to use SDSs or MSDSs generated from the HMIRS. When using this method for determining compatibility complete the following steps:

- STEP 1. For each HM product to be stored, determine the Hazard Characteristic Code (HCC). See Sections 7 and 10 of SDSs to find information that will assist in assigning the HCC. (See Figure 3-1 for information on how to locate the HCC on a typical HMIRS SDS).
- STEP 2. Store HM separately from any incompatible materials listed in Section 10 and IAW with instructions provided in Section 7 of the SDS.
- STEP 3. Use the HM Storage Compatibility Chart shown as Table 3-1 below to determine storage segregation requirements (Also see other indicators such as DOT Hazard Class or product warning labels to verify the HCC).
- STEP 4. If the SDS is not available or does not contain the HCC designation, Use DOT Hazard Class and/or label warning information to identify the Hazard Material Use Group (HMUG) or “Group Number” (See column 1 of Table 3-1).
- STEP 5. Once the HMUG or Group Number has been identified for each material, move across the chart to column 5 to see the other HMUG or Group Numbers the material must be segregated from while in storage.
- STEP 6. Column 5 of Table 3-1 also identifies some common HMs that are included in the HMUG or Groups that are identified as incompatible, while Column 6 identified some of the undesirable reactions that can occur if the two incompatible materials are mixed.
- STEP 7. Establish segregated storage areas for class of HM that is identified as incompatible on Table 3-1.

Table 3-1: Hazardous Material Storage Compatibility Chart

						
HMUG GROUP	HCC see note 2	GROUP NAME	EXAMPLES	INCOMPATIBLE MATERIALS	EXAMPLES	REACTION IF MIXED
1	C1, C2, C4, C5	ACIDS 	Battery Acid Paint Removers De-Rust Spray	FLAMMABLES/ COMBUSTIBLES ALKALIS/BASES/CAUSTICS OXIDIZERS (HMUG Groups 2, 3, 4, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20, 22)	Degreasers, Carbon Removers, Anti-Fogging Compounds	HEAT Gas Generation VIOLENT REACTION 
2	F1 to F7, P1, T6, V3, V4	ADHESIVES	Epoxies Isocyanates Diethylenetriamine 	ACIDS ALKALIS/BASES/CAUSTICS OXIDIZERS (HMUG Groups 1, 3, 18)		HEAT FIRE HAZARD 
3	B1, B2	ALKALIES BASES/ CAUSTICS 	Ammonia Sodium Hydroxide Cleaners	ACIDS/OXIDIZERS FLAMMABLES/COMBUSTIBLES (HMUG Groups 1, 2, 6, 8, 9, 10, 11, 14, 17, 18, 19, 20, 22)	Battery acid, Paint Removers, De-Rust Sprays, Paints, Solvents	HEAT Gas Generation VIOLENT REACTION 
4	C1-C4, B1-B3, F2 to F7, T4, T5, V2-V4	CLEANING COMPOUNDS	Degreasers Carbon Removers Antifogging Compounds	DETERGENTS/SOAPS OXIDIZERS (HMUG Groups 1, 7, 18)	Calcium Hypochlorite, Sodium Nitrite, Hydrogen Peroxide	HEAT FIRE HAZARD 
5	G1 to G9	COMPRESSED GASES 	Acetylene, Propane, Nitrogen, Argon, Helium, Oxygen	HEAT SOURCES Consult paragraph C23 for specific handling and storage guidance (HMUG Groups 8, 9, 10, 11, 12, 15, 16, 19)		FIRE HAZARD EXPLOSION HAZARD 
6	F2 to F5, T6, V2, V3, V4	CORROSION PREVENTIVE COMPOUNDS	Corrosion Inhibitors Chemical Conversion Compounds	ACIDS/BASES OXIDIZERS IGNITION SOURCES (HMUG Group 1, 3, 16, 20)		FIRE HAZARD 
7	B3	DETERGENTS/ SOAPS	Trisodium Phosphate Scouring Powders Disinfectants	ACID-CONTAINING COMPOUNDS (HMUG Groups 1, 4, 18)	Battery Acid, Paint Removers De-Rust Sprays	VIOLENT REACTION HEAT 
8	F8, V6, V7	GREASES 	Lithium Grease Silicone Molybdenum	OXIDIZERS ALKALIS/BASES/CAUSTICS (HMUG Groups 3, 5, 18)		FIRE HAZARD HEAT 
9	T6, V4, V6, V7	HYDRAULIC FLUIDS 	Petroleum-Based Synthetic Fire-Resistant	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)		VIOLENT REACTION 
10	F2 to F4, T4, T5, V2-V6	INSPECTION PENETRANTS	Petroleum-Based Dyes	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)	Battery Acid Caustic Soda Chlorine laundry bleach Calcium Hypochlorite Hydrogen Peroxide OBA Canisters Paint Removers	EXPLOSION HAZARD 
11	F4, T6, V2, V3, V4, V6	LUBRICANTS/ OILS	General Purpose, Gear, Turbine, Weapons			
12	F2 to F6, P1, T3, T4, T6, V1-V4	PAINT MATERIALS 	Primers, Enamels, Urethanes, Lacquers, Varnishes, Non-Skid, Thinners	ACIDS, OXIDIZERS (HMUG Groups 1, 5, 18)		HEAT FIRE HAZARD 
13	C1-C4, B1-B3, D1	PHOTO CHEMICALS	Developers, Stopbath, Toners, Bleaches, Replenishers	ACIDS HEAVY METALS (HMUG Groups 1, 16, 20)		HEAT FIRE HAZARD 
14	F4	POLISH/WAX COMPOUNDS	Buffing Compounds Metal Polishes General Purpose Waxes	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 16)		HEAT, FIRE HAZARD VIOLENT REACTION 
15	F2 to F6, T3, T4, T6, V1-V4	SOLVENTS	Methyl Ethyl Ketone (MEK) Toluene, Xylene Acetone	CORROSIVES OXIDIZERS BATTERIES (HMUG Groups 1, 5, 16, 21, 22)	Battery Acid Calcium Hypochlorite Sodium Nitrite Sodium Hydroxide	HEAT FIRE HAZARD 
16	T6, T7, Z1	THERMAL INSULATION	Asbestos Fiberglass Glass Wool	MATERIAL IS NOT REACTIVE KEEP DRY		NO REACTION
17	C1-C4, B1-B3, D1	WATER TEST/ TREATMENT CHEMICALS	Nitric Acid Mercuric Nitrate Caustic Soda	CORROSIVES OXIDIZERS HEAVY METALS (HMUG Groups 1, 3, 18, 20, 21)		HEAT VIOLENT REACTION 
18	D1 to D4	OXIDIZERS 	Calcium Hypochlorite Laundry Bleach OBA Canisters	PETROLEUM BASED MATERIALS FUELS, SOLVENTS, CORROSIVES, HEAT (HMUG Groups 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 19, 20, 21, 22)		FIRE HAZARD VIOLENT REACTION EXPLOSION HAZARD TOXIC GAS GENERATION 
19	F1 to F4, V4, V5, V6	FUELS	JP4, JP5 Gasoline Diesel Fuel	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 5, 18)	Battery Acid Calcium Hypochlorite Sodium Nitrite Sodium Hydroxide	FIRE HAZARD TOXIC GAS GENERATION
20	T6, V7, Z2	HEAVY METALS	Mercury Lead Beryllium	CORROSIVES WATER TREATMENT/PHOTO CHEMICALS (HMUG Groups 1, 3, 6, 13, 17, 18, 21)		VIOLENT REACTION GENERATION OF TOXIC AND FLAMMABLE GAS
21	Z4 to Z7	BATTERIES	Lead-Acid Dry-Cell Alkaline	SOLVENTS HEAVY METALS OXIDIZERS (HMUG Groups 15, 17, 18, 20)	Xylene Toluene Alcohol	HEAT VIOLENT REACTION TOXIC GAS GENERATION 
22	T2 to T6	PESTICIDES	Insecticides, Fungicides Rodenticides Fumigants	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 15, 18)		TOXIC GAS GENERATION

1. This chart is to be used as a **GUIDE ONLY!**
2. Compare the desired HMUG Group/HCC in the left column with the Incompatible Material(s) of that Group in the center column on the same row. Mixing of the HMUG Group/HCC with the Incompatible Material(s) may result in the reaction(s) listed in the right column.
3. Not all applicable HCCs are listed; only the most frequently encountered HCCs (except N1) are listed.

[www.safetycenter.navy.mil/training](http://www.safetycenter.navy.mil/training)

REV 09-03

**Figure 3-2: SDS Sections 7 & 10 – Handling, Storage and Compatibility Info**

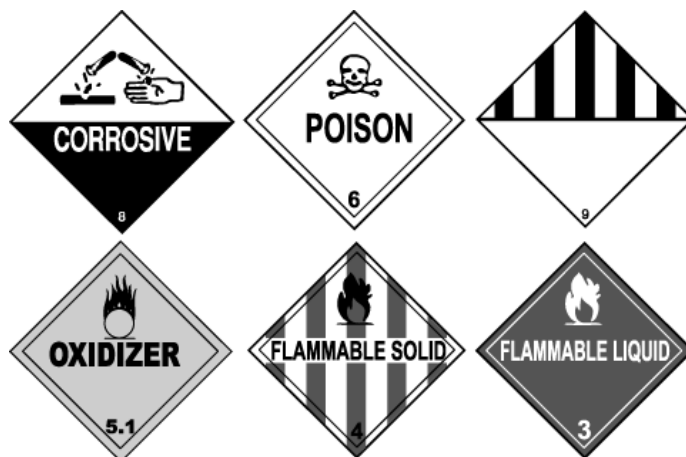
<b>7. Handling and Storage</b>			
<p><b>Handling</b>  <b>General Handling:</b> Avoid contact with eyes, skin, and clothing. Avoid prolonged or repeated contact with skin. Wash thoroughly after handling. Avoid breathing vapor. Use with adequate ventilation. Keep container tightly closed. See Section 8, EXPOSURE CONTROLS AND PERSONAL PROTECTION.  <b>Other Precautions:</b> Spills of these organic materials on hot fibrous insulations may lead to lowering of the autoignition temperatures possibly resulting in spontaneous combustion.</p>			
<p><b>Storage</b>                      Store in a dry place. Protect from atmospheric moisture. Do not store product contaminated with water to prevent potential hazardous reaction. See Section 10 for more specific information. Additional storage and handling information on this product may be obtained by calling your sales or customer service contact.</p>			
<b>Storage Period:</b>	6 Months	<b>Storage temperature:</b>	24 - 41 °C
<b>8. Exposure Controls / Personal Protection</b>			
<b>Exposure Limits</b>			
Component	List	Type	Value
4,4' -Methylenediphenyl diisocyanate	ACGIH	TWA	0.005 ppm
	OSHA Table Z-1	Ceiling	0.2 mg/m3 0.02 ppm
Page 4 of 10			

<b>10. Stability and Reactivity</b>
<p><b>Reactivity</b>                      Diisocyanates react with many materials and the rate of reaction increases with temperature as well as increased contact; these reactions can become violent. Contact is increased by stirring or if the other material mixes with the diisocyanate., Diisocyanates are not soluble in water and sink to the bottom, but react slowly at the interface. The reaction forms carbon dioxide gas and a layer of solid polyurea., Reaction with water will generate carbon dioxide and heat.</p>
<p><b>Chemical stability</b>                      Stable under recommended storage conditions. See Storage, Section 7.</p>
<p><b>Possibility of hazardous reactions</b>                      Can occur. Exposure to elevated temperatures can cause product to decompose and generate gas. This can cause pressure build-up and/or rupturing of closed containers. Polymerization can be catalyzed by: Strong bases. Water.</p>
<p><b>Conditions to Avoid:</b> Exposure to elevated temperatures can cause product to decompose. Generation of gas during decomposition can cause pressure in closed systems. Pressure build-up can be rapid. Avoid moisture. Material reacts slowly with water, releasing carbon dioxide which can cause pressure buildup and rupture of closed containers. Elevated temperatures accelerate this reaction.</p>
<p><b>Incompatible Materials:</b> Avoid contact with: Acids. Alcohols. Amines. Water. Ammonia. Bases. Metal compounds. Moist air. Strong oxidizers. Diisocyanates react with many materials and the rate of reaction increases with temperature as well as increased contact; these reactions can become violent. Contact is increased by stirring or if the other material mixes with the diisocyanate. Diisocyanates are not soluble in water and sink to the bottom, but react slowly at the interface. The reaction forms carbon dioxide gas and a layer of solid polyurea. Reaction with water will generate carbon dioxide and heat. Avoid contact with metals such as: Aluminum. Zinc. Brass. Tin. Copper. Galvanized metals. Avoid contact with absorbent materials such as: Moist organic absorbents. Avoid unintended contact with polyols. The reaction of polyols and isocyanates generate heat.</p>
<p><b>Hazardous decomposition products</b>                      Decomposition products depend upon temperature, air supply and the presence of other materials. Gases are released during decomposition.</p>

### Method 2: Determining Compatibility Using DOT Hazard Class Labels

STEP 1. If a HMIRS generated SDS is not available, look on the container or the box it was shipped in for a DOT Hazard Class Label.



Figure 3-3: Sample DOT Hazard Class Labels










STEP 2. If a DOT Hazard Class label is present, use Table 3-2 to identify the HCC.

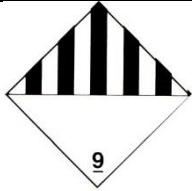
STEP 3. Once you have identified the HCC Code, go back to Method 1 and follow Steps 4 through 6 to determine compatibility.

Table 3-2: DOT Hazard Class Labels and HM Compatibility

DOT Label	DOT Label Name	HCC	
		Code	Hazard Class
	Flammable Gas (Cylinder)	G2	Flammable Gas Cylinder
	Flammable Gas (Aerosol Non-refillable tank or Canister)	V3	Aerosol Containers

DOT Label	DOT Label Name	HCC	
		Code	Hazard Class
	Non-Flammable Gas	G3	Nonflammable Gas Cylinder
	Flammable Liquid	F1-F4	Flammable Liquid
	Oxidizer	D1	None Required
	Organic Peroxide	P1	None Required
	Poison	T2	None Required
	Corrosive	C1, C2, C4, C5 (Acid)*	Acid
	Corrosive	B1, B2 (Alkali)*	Alkali












DOT Label	DOT Label Name	HCC	
		Code	Hazard Class
	Class 9	V1	None Required

**Method 3: Determining Compatibility Using OSHA Pictograms and Precautionary Statements (on Product Labels)**

STEP 1. If a HMIRS generated SDS is not available, look on the HM container for an OSHA-GHS pictogram on the label (See Figure 3-4). Pictograms on labels can be used to determine compatibility of HMs using Table 3-3.








**Figure 3-4: Example OSHA GHS Pictograms and Label Warning Statements**


GHS PICTOGRAMS		
<p><b>Health Hazard</b> Carcinogens, respiratory sensitizers, reproductive toxicity, target organ toxicity, germ cell mutagens</p> 	<p><b>Flame</b> Flammable gases, liquids, &amp; solids; self-reactives; pyrophorics</p> 	<p><b>Exclamation Mark</b> Irritant, dermal sensitizer, acute toxicity (harmful)</p> 
<p><b>Gas Cylinder</b> Compressed gases; liquefied gases; dissolved gases</p> 	<p><b>Corrosion</b> Skin corrosion; serious eye damage</p> 	<p><b>Exploding Bomb</b> Explosives; self-reactives; organic peroxides</p> 
<p><b>Flame Over Circle</b> Oxidizers gases, liquids and solids</p> 	<p><b>Environment</b> Aquatic toxicity</p> 	<p><b>Skull &amp; Crossbones</b> Acute toxicity (severe)</p> 

STEP 2. If a GHS pictogram or warning statement is present on the label, use Table 3-3 below to identify the HCC. Find the pictogram and “Statement of Hazard” in the first two columns of the table.

STEP 3. Once you have the Suggested Temporary HCC from column 3, go back to Method 1 and follow Steps 4 through 6 to determine compatibility.

**Table 3-3: OSHA GHS Pictograms and HM Compatibility**

Pictogram	Examples of Hazard Statements	Suggested HCC	Recommended Primary Storage Area	Recommended Secondary Storage Area
	<ul style="list-style-type: none"> <li>• Eye or Skin Irritant</li> <li>• Skin Sensitizer</li> <li>• Respiratory Tract Irritant</li> <li>• Narcotic Affects</li> </ul>	T6	Low Hazard	Flammable Storage Locker (if also Flammable)
	<ul style="list-style-type: none"> <li>• Skin Burns/Corrosion</li> <li>• Eye Damage</li> <li>• Corrosive to Metals</li> </ul>	C1, C2, C4, C5	Corrosive	<b>Acid (pH &lt; 5.0)</b>
	<ul style="list-style-type: none"> <li>• Skin Burns/Corrosion</li> <li>• Eye Damage</li> <li>• Corrosive to Metals</li> </ul>	B1, B2	Corrosive	<b>Alkali (pH &gt; 9.0)</b>
	<ul style="list-style-type: none"> <li>• Flammable (liquids and gases)</li> <li>• Pyrophoric</li> <li>• Self-Heating</li> <li>• Emits Flammable Gas</li> <li>• Self-Reactive</li> <li>• Organic Peroxide</li> </ul>	F1	Flammable Storage Locker	Approved Flammable Liquid Storage Rooms/Bldgs.
	<ul style="list-style-type: none"> <li>• Compressed Gas</li> <li>• Pressurized Container (Aerosols)</li> <li>• Release may Reduce Oxygen Available for Breathing</li> </ul>	G1 to G9	Flammable Gas Storage Cage or Locker	Approved Flammable Gas Storage Rooms/Bldgs/Cages
	<ul style="list-style-type: none"> <li>• Oxidizer</li> <li>• Contact with Other Materials May Cause Fire</li> </ul>	D1 to D4	Oxidizer	Segregate from all other HMs (including POL) when in Storage
	<ul style="list-style-type: none"> <li>• Acute Toxicity</li> <li>• Exposure may be Immediately Toxic or Fatal</li> </ul>	T6	Pesticides (includes; Herbicides, Fungicides, Insecticides and Rodenticides)	Segregate from all other HMs (including POL) when in Storage

Pictogram	Examples of Hazard Statements	Suggested HCC	Recommended Primary Storage Area	Recommended Secondary Storage Area
	<ul style="list-style-type: none"> <li>• Chronic Toxicity</li> <li>• Carcinogen, Mutagen, Sensitizer</li> <li>• Reproductive, Aspiration or Target Organ Toxicity</li> </ul>	T6, C3, C4, Z4 to Z7	Low Hazard	Flammable Storage Locker (if also Flammable)

## Maintaining and Extending Shelf Life of HMs

An effective waste-minimization program includes active life-cycle management of HMs before they turn into hazardous waste. One of the best and highest payback methods of doing that is to establish a good shelf-life extension program. Shelf life is the total period of time that an item may remain in the storage system and still remain suitable for issue. Products can deteriorate or become unstable in storage and can be sensitive to light, temperature, moisture or handling. Packaging deterioration and improper storage can adversely affect shelf life. It begins with the date of manufacture, cure, assemble, pack, or inspect/test/restorative action. A shelf-life item is an item of supply having deteriorative or unstable characteristics to the degree that a storage-time period must be assigned to ensure that it will perform satisfactorily while in service.

***Note:** HMs purchased locally that do not have an expiration date are not shelf-life items and can be used indefinitely or until the item becomes unserviceable. Half of the HMs purchased through the military supply system are non-shelf-life items.*

### Shelf-life Types

To determine if an item is a shelf life or non-shelf-life item, look at the container label. **If the container label does not have a test, inspection, or expiration date, it is not a shelf-life item.** If the item is not a shelf-life item, use it indefinitely or until it becomes unserviceable. If the item is a shelf-life item, properly manage it as a Type I or Type II material, as explained below.

### Type I Materials- have definite non-extendable shelf life

Type- I –are critical end-use items, the failure of which could endanger human life or cause major systems (such as aircraft) to fail. Examples include: Packaged food, medicines, heat dissipating coatings, adhesives and sealing compounds. Type I material has an alphabetical shelf-life code and an expiration date. **Type I materials are not extendible.** DoD policy requires that Type I HM be used or disposed of within 30 days of the expiration date. *One exception* is Type I medical items, which may be extended if they have been accepted as candidates for the DoD Shelf-life Extension Program. See Chapter 4 for turn-in instructions. Type I materials are required to be

marked with either the date manufactured, date cured, date assembled, or date packed (apply one as appropriate), as well as the expiration date.

**Table 3-4: Type I Shelf-life Codes**

Shelf-life Code	Shelf Life (Months)	Shelf-life Code	Shelf Life (Months)
A	1	N	27
B	2	P	30
C	3	Q	36
D	4	R	48
E	5	S	60
F	6	T	84
G	9	U	96
H	12	V	108
I	72	W	60
J	15	X	CPC >60
K	18	Y	180
L	21	Z	240
M	24		

**Type II Materials- extendable for less critical applications than Type I**

Type II material (90% of shelf-life material) has a numeric shelf-life code and a test/inspect date marked on the container. **Type II materials are extendible.** Every effort must be made to extend the life of the material until it is used. Type II items can be extended by visual inspection or laboratory analysis. Type II materials with a test date must only be extended using laboratory analysis.

**Table 3-5: Type II Shelf-life Codes**

Shelf-life Code	Shelf Life (Months)	Shelf-life Code	Shelf Life (Months)
0	Non-deteriorative	5	18
1	3	6	24
2	6	7	36
3	9	8	48
4	12	9	60

**Extending Type II Material Using Visual Inspection**

Most items can be extended through visual inspections. Anyone can conduct visual inspections for items not requiring certified test results. The extension time information used to establish the next test/inspection date can be obtained from

Federal Logistics Data System (FEDLOG) or the Material Quality Control Storage Standard (MQCSS).

To extend Type II shelf-life items, follow these steps:

STEP 1. Visually inspect the containers. When conducting a visual inspection check for:

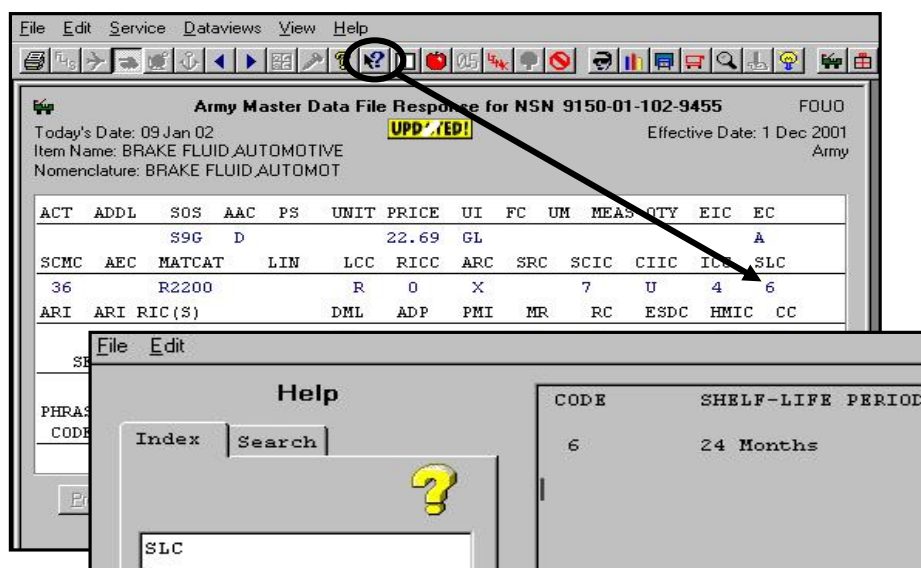
- Leakage, broken glass
- Rodent/insect infestation
- Hardening/liquefying
- Bulging containers
- Rust, caking, and powdering
- Liquid evaporation/condensation
- Proper label

If any containers are not in good condition, process them for disposal IAW Chapter 4.

STEP 2. Obtain extension information from FEDLOG, or MQCSS, depending on whether it is mission essential or not.

**For Non-mission Essential Items** – Use FEDLOG to obtain the shelf-life extension information. Once in FEDLOG, enter the NSN. When the screen comes up for the item, find the Shelf-life Code indicated by “SLC.” Click on the “contents” icon and drag it to the code, or highlight the information in the SLC column and click the right mouse button. A table will appear that indicates if the item is a Type I or Type II as well as the material’s shelf-life period. There is often a code associated with the item status (a letter is indicative of a Type I item, a number is indicative of a Type II item). The screen shot below provides an illustration. In this case, brake fluid is a Type II item with a 24-month shelf life.

**Figure 3-5: FedLog Example**



**For Mission Essential Items (Not Requiring Laboratory Certification)** – Use the MQCSS. The MQCSS is a database that implements uniform storage standards for Type II (extendible) NSNs. While the MQCSS was designed for wholesale managing activities, the NYARNG can use it to obtain the following shelf-life information for mission essential items. The website for .MIL users includes shelf-life policy documents and the quality status list (QSL) and MQCSS internet-based programs. The .MIL website is located at: <https://www.shelflife.hq.dla.mil/> . You must request a Shelf life extension account in order to access.

Access the website and follow the instructions on the site Home Page (Note: The shelf life renewal site is subject to regular updates of content, format and security. Due to this fact, actual screen shots of the site are not included in this plan).

- STEP 1. Once on the **MQCSS** site, enter the **NSN** for the product in question and click the **Search** button.
- STEP 2. Once the NSN and the Item Product Name are confirmed for the product, click on the item to determine shelf life code.
- STEP 3. Refer to Table 3-5 to determine approved length of extension (in months) based on the shelf life code.

### **Extending Type II Material Using Laboratory Analysis**

**For Mission Essential Items (Requiring Laboratory Certification)** – The shelf-life website ([www.shelflife.dla.mil](http://www.shelflife.dla.mil)) also contains information concerning laboratory testing certification required to extend the shelf life on some items. This information is found in the QSL. The QSL contains the results of tests by DoD/General Services Administration (GSA) commercial physical science laboratories on Type II shelf-life material. The test determines whether or not the material is unstable or has experienced any deterioration, rendering it unusable. The results of these tests can be used to extend the shelf life of material on hand. In order for the test results on one unit of material to be applied to other units in storage, the material must share the same unique identifiers of NSN, Contract, and Lot/Batch identification. The QSL will provide the last test date and the date the next test is due.

- STEP 1. To access the QSL section of the shelf life website, follow the link above. (Note: You must request a role via Account Management and Provisioning System (AMPS). See site registration guidance.).
- STEP 2. Once on the **Shelf-Life Extension System (SLES)**. **SLES users search the Materiel Quality Storage Standards (MQCSS) and Quality Status List (QSL) databases to view data elements required to determine if shelf-life NSN can be extended. MQCSS provides guidance on inspection, testing and storage requirements for Type II extendible shelf-life materiel.**
- STEP 3. MQCSS is the authority for shelf-life extension when visible inspection only is required.

STEP 4. QSL contains the results of previously completed laboratory extension testing. QSL testing results with supply condition code “A” may be used as the authority to extend Type II shelf-life if it has been stored and packaged appropriately.

### Completing Shelf-life Extension Notice Information

Once you have determined (using either the MQCSS or QSL) that a HM product can be extended, mark the following data on the container with a shelf-life extension sticker or, if space allows, directly on the container with a permanent marker. See Figure 3-6 shows an example of a shelf-life extension notice label obtained from the DoD Shelf-life program website. Similar labels may be used as long as the same information is recorded on the label.

- Inspection/test date (day visually extended or QSL date)
- Next inspection/test date
- Authority (QSL, MQCSS, or laboratory name)
- Initials of person who inspected and extended item

**Figure 3-6: Shelf-life Extension Notice Label**

<b>SHELF-LIFE EXTENSION NOTICE</b>	
<small>PER DoD 4140-27M, CONTAINERS REQUIRE REMARKING WITH EXTENDED SHELF-LIFE DATA. UNITS OF ISSUE REQUIRE RE-MARKING UPON OPENING CONTAINER.</small>	
NSN:	_____
CONTRACT NUMBER:	_____
LOT/BATCH NUMBER:	_____
DATE TESTED:	_____
NEXT INSP/TEST DATE:	_____
AUTHORITY:	_____ (QSL, MQCSS, OTHER)
INSPECTED BY:	_____ (ACTIVITY AND INSPECTOR'S NAME OR NUMBER)

DD FORM 2477-3 MAR 1999 Previous edition may be used until supply is exhausted

### Additional Hazardous Material Stocking Requirements

*Reference: Joint Service Manual DLAI4145.11/TM38-410/NAVSUP PUB 573/AFJMAN 23-209/MCO 4450.12A, Storage and Handling of Hazardous Materials 4 March 2020*

Whether checking in new products or maintaining current stock; the UECO or FEEO must ensure that HMs are properly stored to minimize hazards to personnel and property.

Additional requirements for stocking HMs are listed below:

STEP 1. HM Container Labeling: Check that every HM container, bottle, can, box, etc. on hand at your activity is properly labeled with the following:

- Storage area number
- Product name

- SLN (see *Safety Data Sheet* section)
- Any warnings of physical or health hazards listed on the SDS

Re-label any HM containers that do not have a readable label. It is preferred that you maintain the original manufacturer labels. However, if the original label is missing or damaged, use the example shown below:

NSN: 6950-00-224-6656 Chemical Name: Cleaning Compound Rifle Bore Manufacturer Name: American Writing Ink Co
--

**Note:** *If the hazardous material is transferred to a different container, label the new container with all information as noted in Step 1 above.*

- STEP 2. Place the HM in the designated numbered shelf/rack location as described in Chapter 2, and update the inventory sheet when new HMs are added to the storage location.
- STEP 3 Rotate containers so that those HMs nearing expiration are placed in front. Remember, FIRST IN, FIRST OUT.
- STEP 4. As a BMP, post the Inventory Form for each HM Storage Location as follows:
- For lockers, place the Inventory Form in a plastic sleeve on the outside of the locker.
  - For storage rooms, buildings, areas, place the Inventory Form in a plastic sleeve located on or near the storage area.

## Tracking HM Inventory

### Conducting an Inventory of Hazardous Materials

An accurate HM inventory provides management with essential information about processes that use the materials. Hazardous chemical inventories are required by OSHA 1910.1200 and NYARNG Reg. 385.9. Inventories are to be conducted IAW NYARNG Regulation 385-9 and this Plan. Inventories are required to be computer originated and have the capabilities of sorting and compiling a list of chemicals by NSN or trade name (nomenclature). Inventories are needed for the following:

- P2 reporting requirements
- Assessing processes for P2 opportunities
- Measuring success in minimizing HM use

To track the annual purchase, use, and storage of HM, the UECO or FECO must complete the following steps:



- STEP 1. Conduct an inventory of every storage locker, room, warehouse, or rack, periodically as a BMP, to ensure your materials are managed as required. Inventory forms may be requested at least once a year by the Environmental Office.
- STEP 2. Post the latest copy of the inventory outside the storage area.
- STEP 3. Send completed Inventory Forms to the Environmental Performance Assessment (EPAS) Manager in the Environmental Office upon request.

This information is used for Emergency Planning and Community Right-to-Know Act (EPCRA), state, and local reporting requirements.

To conduct an inventory, complete the following steps:

- STEP 1. Check that every container, bottle, can, box, etc. is labeled with the following:
  - The product name
  - Any warning of physical or health hazards listed on the SDS
  - Replace any labels that are missing or unreadable.
- STEP 2. Obtain an [Inventory Form](#) as shown in Figure 3-7 or an equivalent.
- STEP 3. Complete the Inventory Form.



# GASOLINE & DIESEL FUEL CAN STORAGE

STG-1

## GENERAL REQUIREMENTS

The purpose of this Storage Guidance (STG-1) is to provide guidance on the proper storage, labeling and handling of flammable and combustible liquids such as gasoline and diesel. Improper handling can result in possible fire, explosion, spills, injury or other health and safety issues. Guidelines for flammable liquid storage are found under the Occupational Safety & Health Admin (OSHA) regulations 1910.106 and National Fire Protection Association (NFPA) 30. The general requirements for the handling and use of flammable and combustible liquids such as a gasoline are set forth in 29 CFR 1926.152(a):

***In the NYARNG, Fuel supplies are critical for mission preparedness. It is important to know how to properly handle and manage fuel cans.***

- Gasoline has a flash point at - 45 degrees Fahrenheit. The flash point is the lowest temperature at which a flammable liquid gives off enough vapors to form an ignitable mixture with air. A fire or explosion will likely occur if exposed to a source of ignition.
- Diesel Fuels typically have a flash point above 140 degrees Fahrenheit, so they are not easily ignitable, but are still considered a fire hazard.

CONTAINERS - Flammable and combustible liquids such as gasoline and diesel are normally stored in smaller containers. (1) Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids. Approved safety cans or Department of Transportation approved containers shall be used for the handling and use of flammable liquids in quantities of 5 gallons or less...[Emphasis added.] A safety can is (29CFR1926.155(1) an approved, closed container, of not more than 5 gallons capacity, having a flash arresting screen, spring closing lid and spout cover and so designed that it will safely relieve internal pressure when subjected to fire exposure. Approval is given by a nationally recognized testing laboratory, for example, Underwriters' Laboratory, Inc.

The best method to store small quantities of flammable and combustible liquids is in approved safety cans, a 30 gal gasoline Gas Caddy or in Military standard approved Jerry Cans. These safety Cans are designed with a sturdier base and have tight-fitting, self-closing lids so they are less likely to tip over and leak. They have a flash arrestor screen which prevents any flashback of fire into the can. The cans also have automatic vents which help relieve any internal pressure that could result in the rupture of the can in the event of a fire.

## Step 1 Storage of Flammable and Combustible Containers

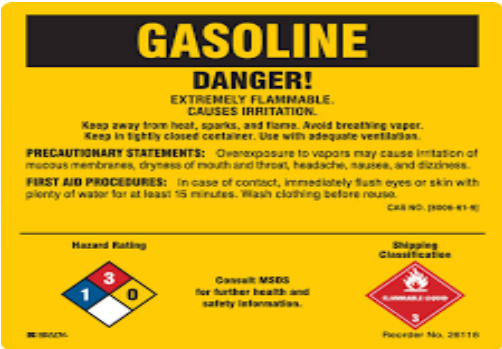
Flammable liquids must be stored in closed containers. Store smaller gas cans in Flammable storage cabinets or fire approved storage building/area whenever possible. No more than 60 gals of 1, 2, or 3 flammable liquids can be stored in any one flammable storage cabinet as per OSHA 1926.152. Not more than 60 gallons of flammable or 120 gallons of combustible liquids may be stored in any one storage cabinet. Not more than three such cabinets may be located in a single storage area. 29 CFR 926.152(b)(3)

Safety cans **shall be stored on appropriate sized secondary containment spill pallets** within a fire approved storage building/area. Ensure properly sized spill kit and fire extinguishers are nearby. For more information regarding proper storage of Gasoline and Diesel Fuel contact the state or federal safety office at 518-786-6079 and 518-786-6097 respectively.

# GASOLINE & DIESEL FUEL CAN STORAGE

**Step 2 Labeling-color code**

Ensure you properly label the safety cans as to its contents. I.e. GASOLINE/ DIESEL FUEL.



Labels can be ordered through [www.Grainger.com](http://www.Grainger.com)

Storage Sheds-label exterior storage areas and sheds with either a flammable sign or an NFPA diamond when they store bulk gas/diesel inside. Most facilities use container color to ID the product as pictured below.

<p><b>RED</b></p> <p>Most widely used for flammable liquids such as gasoline.</p> 	<p><b>BLUE</b></p> <p>Frequently used for storage of the kerosene.</p> 	<p><b>YELLOW</b></p> <p>Can be used to designate the storage of diesel fuel.</p> 	<p><b>GREEN</b></p> <p>Often used for the storage of oil.</p> 
			

# GASOLINE & DIESEL FUEL CAN STORAGE

STG-1

Step 3

Handling/Filling



When FILLING a gasoline safety can, the can should be placed on the ground (or on secondary containment if available) and not in the back of a truck with a plastic bed liner or carpeted surface. Static electricity can build up and the build-up can result in a spark that could ignite the vapors and result in a fire or explosion. Before refilling, touch the dispenser nozzle to the container to dissipate any static charge. Keep part of the nozzle in contact with the container inlet during the entire refilling process. All containers of Category 1, 2 or 3 liquids (with a flash point lower than 100 degrees Fahrenheit). If the container is made of metal or conductive plastic and can conduct electricity the bonding is necessary. If a container is made from a material that does not conduct electricity, such as polyethylene plastic or glass, bonding or grounding is not necessary. Ground containers when dispensing flammable liquids between metal by attaching a special bonding containers. In Flammable liquid storage areas, ground dispensing drum. Thus preventing a static charge. Bonding is done by making an electrical connection from one metal container to the other. This ensures that there will be no difference in electrical potential between the two containers, thus no sparks are formed.

# **Chapter 4 Waste Accumulation and Storage Areas**

Due to federal and state regulatory requirements, Hazardous Waste and Universal Waste must be managed and stored within required locations and set time frames.

Federal and state waste management regulations allow for the accumulation of hazardous and universal wastes by two different methods.

- Hazardous waste can be initially accumulated (added to containers) at a Satellite Accumulation Area (SAA) located near the area or operation where the waste is generated. Once the container is full, an Accumulation Start Date (ASD) is written onto the waste container and it is moved to a Hazardous Waste Storage Building (HWSB) within 72 hours to await future disposal.
- Hazardous waste can also be accumulated (added to containers) inside a designated HWSB. In this instance the ASD is written onto the container as soon as waste is added to it.
- Universal Wastes (UW) can be accumulated in either a SAA or a HWSB. Containers of UW must have the ASD written onto them as soon as the first waste item is placed inside (typically used lamps and batteries).
- For additional reference, see the Waste Accumulation Protocol sheets for managing SAAs (WAP-01) and HWSBs (WAP-02), included at the end of this chapter.
- IAW AR 200-1, HW are not to be stored in underground storage tanks (USTs).

## **General Requirements: Set-up of Waste Accumulation and Storage Areas**

Requirements listed here are applicable to establishment of a SAA or a HWSB. The checklist included as Attachment 4-1 can be used to verify that all general location requirements are met.

- Select a well-ventilated site indoors or a site outdoors that is under cover and fenced or otherwise secured to prevent unauthorized access.
- Accumulation or storage areas for ignitable (flammable) and corrosive wastes must be located at least 50-feet from the property boundary.
- Accumulation containers for ignitable (flammable) wastes must be grounded.
- Plug floor drains within 50 feet, if accumulating liquid waste.
- Position and maintain fire extinguishers with ABC rating in a prominent location near each SAA or HWSB. (Coordinate with the SSO to verify proper fire extinguisher location).
- Post recommended warning signs in a visible location at the site so they are readable from 50-feet away. (See Figure 4-1).

- See Attachments 4-1 and 4-2 at the end of this chapter for full-size templates of the recommended signage. These templates can be duplicated, laminated and used at NYARNG facilities.
- Place and maintain enough spill response equipment nearby to contain a spill.
- Ensure that incompatible wastes (See Table 3-1) are segregated.

---

**WARNING!**

**DO NOT** store incompatible wastes (such as acids and bases) together. Use the incompatible materials chart included in this plan (Table 3-1) to determine compatible storage requirements for waste containers.

**DO** segregate incompatible wastes with berms, curbs, walls, spill pallets, or other physical devices.

---

**Figure 4-1: Sign for Waste Accumulation Areas (SAA or HWSB)**



**Figure 4-2: Sign for Hazardous Waste Storage Buildings (HWSB)**

You may use the templates included as Attachments 4-2 and 4-3 to create signs to be posted as illustrated or use an equivalent with the same information provided. The signs must be readable from 50-feet away and made weatherproof (laminated) if posted outdoors.

### **Protocols for Waste Accumulation and Storage of Hazardous Waste**

The following pages contain protocol sheets for accumulation and storage of waste containers in either a SAA (See WAP-01) or a HWSB (See WAP-02). Each protocol sheet is setup to convey operational requirements for these waste accumulation and storage methods in a step-by-step approach. POCs that are appointed to operate and maintain a SAA and/or HWSB can make a copy of the applicable protocol(s) and maintain them as separate documents.

If you share a single facility Generator ID number with another NYARNG activity that generates HW, ensure that together you do not exceed the maximum facility quantity limitations for HW and UW identified for a SQG facility (See [Chapter 5](#)).

***REMEMBER: Good housekeeping practices are essential to maintain a clean, hazard-free work environment!***



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# SATELITE ACCUMULATION AREA (SAA)

WAP-01

## GENERAL REQUIREMENTS SUMMARY

**Note:** A Satellite Accumulation Area is a designated area chosen to accumulate hazardous waste, and must be at or near the point of waste generation. The SAA rule requires proper management until the container becomes full and must be moved to a Hazardous Waste Storage Building (HWSB). The Accumulation Start Date (ASD) is not added to the container until it is full. The ASD dictates when the drum must be shipped for disposal. Only exception is for Universal waste- a Start date is required

- Set up new SAAs in accordance with Attachment 4-1: Self-Assessment Checklist.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 SAA Management Requirements



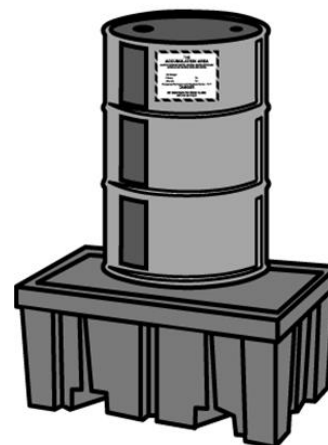
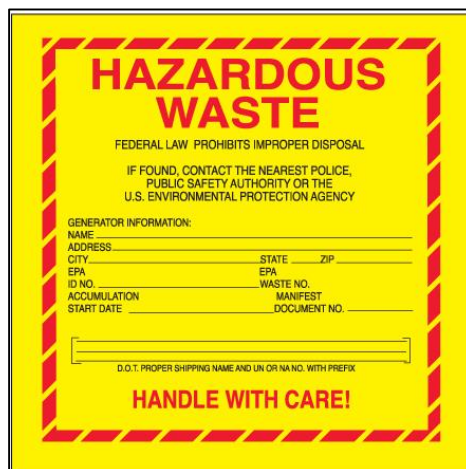
Requirements for proper management and control of a SAA include:

- Must be located at or near the shop operation or process where waste products are generated.
  - Each process that generates waste must have its own SAA (even at the same shop).
- Must be “under the control” of the operator that manages the process or operation (“under control” means the operator controls what wastes go into the containers).
- Must have all waste containers properly labeled/marked. (See WPSs for each waste stream).
- Must have all waste containers closed and sealed (ring/bolt tight), except when adding waste.
- Is restricted to no more than 55-gallons of waste (in single or multiple containers) present at one time. (See Step 3 below for specific container hold-time requirements).

### Step 2 Label/Mark Waste Containers in SAAs with Following Information

Required Container Labels/Markings:

Use Pre-Printed Stickers or Write the Waste Info Directly on the Container with Permanent Marker or Stencil



<b>Step 3</b>	<b>Manage the ASD for Waste Containers in SAAs</b>
Write-in Accumulation Start Date (ASD):	<p><b>Write-in ASD: ONLY when Container is Full. No ASD is required while container is in accumulation mode (except for Universal Waste)</b></p> <p><b>Full waste container(s) must be moved from the SAA to a Hazardous Waste Storage Building (HWSB) within 72 hours of writing-in the ASD. All waste containers in a HWSB must have an ASD.</b></p>
<b>Step 4</b>	<b>Additional Requirements</b>
<ul style="list-style-type: none"> <li>• Wear eye, hand, and clothing protection when handling HW, open waste collection drums slowly, keeping your head/face away from the openings.</li> <li>• Keep waste container(s) closed and sealed (except when adding waste).</li> <li>• Containers of liquid waste must have secondary containment in the form of a dike, curb or spill control pallet.</li> <li>• Position waste containers so labels are readable and a minimum of 3-feet of aisle space to allow access to each container in storage.</li> <li>• Stop filling containers before they are completely full. Maintain headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> <li>• Post signs to identify the location as a waste accumulation area, including phone numbers to contact the POC(s) that control the SAA (See Attachment 4-2).</li> </ul>	
<b>Step 5</b>	<b>Inspections and Recordkeeping</b>
<ul style="list-style-type: none"> <li>• Waste containers in a SAA must be inspected weekly (See Inspection Form, Attachment 8-1).             <ul style="list-style-type: none"> <li>○ As part of the weekly inspection, if no waste is present, note "no containers present" on the inspection form.</li> <li>○ Ensure any deficiencies identified on the checklist are noted and corrected. Maintain file copies of completed inspection forms for three years.</li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Waste Pick-up</b>
<ul style="list-style-type: none"> <li>• For facilities regulated as a Small Quantity Generator (SQG), a container of HW must be picked up for disposal within 180-days of the ASD.</li> <li>• See Chapter 6 for information on scheduling waste pick-ups.</li> <li>• Check the current FY Environmental Waste Agreements for information on contractors approved to perform waste pickups.</li> </ul>	

# HAZARDOUS WASTE STORAGE BUILDING (HWSB)

WAP-02

## GENERAL REQUIREMENTS SUMMARY

**Note:** A Hazardous Waste Storage Building (HWSB) is used to store hazardous waste once it has been accumulated in a container and is ready for disposal. The time allowed for storage on site of a full container of HW is dependent on the facility's generator status. Most NYARNG facilities that generate HW are regulated as Small Quantity Generators (SQGs) and have 180-days from the ASD to ship a full drum for disposal.

- If setting up a new HWSB, see the general requirements described earlier in this chapter for locating waste accumulation and storage areas. See Attachment 4-1 for a checklist that can be used to ensure proper locations are selected to establish a HWSB.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 SAA Management Requirements



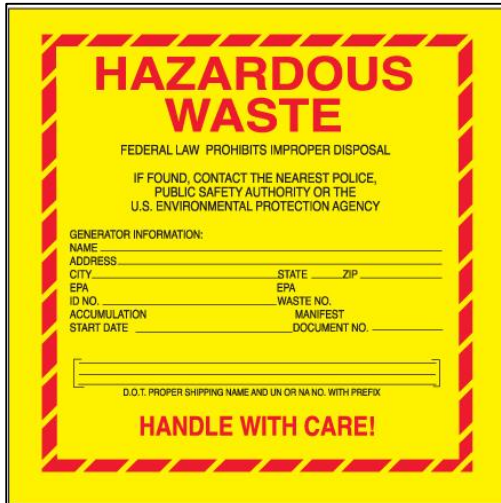
Requirements for proper management and control of a HWSB include;

- May be used as a waste accumulation area (where waste drums are filled), or as a storage area for full drums that were filled at various SAAs around the facility.
- Must have all waste containers properly labeled/marked. (See WPSs for each waste stream).
- Must have all waste containers closed and sealed (ring/bolt tight), except when adding waste.

### Step 2 Label/Mark Waste Containers in SAAs with Following Information

Required Container Labels/Markings:

Use Pre-Printed Stickers or Write the Waste Info Directly on the Container with Permanent Marker or Stencil



<b>Step 3</b>	<b>Manage the ASD for Waste Containers in HWSB</b>
Write-in Accumulation Start Date (ASD):	<p><b>Write-in ASD on all Containers (full or partially full).</b></p> <p><b>HW containers stored in a Hazardous Waste Storage Building (HWSB) must be shipped for disposal within 180 days of applying the ASD for a SQG facility.</b></p>
<b>Step 4</b>	<b>Additional Requirements</b>
<ul style="list-style-type: none"> <li>• Wear eye, hand, and clothing protection when handling HW, open waste collection drums slowly, keeping your head/face away from the openings.</li> <li>• Keep waste container(s) closed and sealed (except when adding waste).</li> <li>• Containers of liquid waste must have secondary containment in the form of a dike, curb or spill control pallet.</li> <li>• Position waste containers so labels are readable and a minimum of 3-feet of aisle space to allow access to each container in storage.</li> <li>• Stop filling containers before they are completely full. Maintain headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> <li>• Post signs to identify the location as a Hazardous Waste Storage Building (See Figure 4-3). Two signs must be posted for each HWSB.             <ul style="list-style-type: none"> <li>○ Signs must be posted so they are visible from two different approach directions and readable from 50-feet away.</li> </ul> </li> <li>• If waste is being accumulated in the HWSB, each drum in accumulation mode must have a sign posted above it as shown in WAP-01, including phone numbers to contact the POC(s) that control the HWSB (See Figure 4-2).</li> </ul>	
<b>Step 5</b>	<b>Inspections and Recordkeeping</b>
<ul style="list-style-type: none"> <li>• Waste containers in a HWSB must be inspected weekly (See Inspection Form, Attachment 8-1).             <ul style="list-style-type: none"> <li>○ As part of the weekly inspection, if no waste is present, note "no containers present" on the inspection form.</li> <li>○ Ensure any deficiencies identified on the checklist are noted and corrected. Maintain file copies of completed inspection forms for three years.</li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Waste Pick-up</b>
<ul style="list-style-type: none"> <li>• All waste containers accumulated or stored in a HWSB, must be picked up for disposal within 180-days of the ASD. (Remember; for waste being accumulated in a HWSB, the ASD must be applied to the container as soon as it is put into service).</li> <li>• See Chapter 6 for information on scheduling waste pick-ups.</li> <li>• Check the current FY Environmental Waste Agreement for information on contractors approved to perform waste pickups.</li> </ul>	

## Attachments

This section contains the following attachments:

- Attachment 4-1: Self Inspection Checklist – General Set-up Requirements for SAA and HWSB Locations
- Attachment 4-2: Waste Accumulation Area Warning Sign
- Attachment 4-3: Hazardous Waste Storage Building Warning Sign

### Attachment 4-1: General Setup Requirements for SAA and HWSB

Self Inspection Checklist					
	<u>Set-up of Waste Accumulation and Storage Areas</u>	<u>Please Circle</u>			<u>Comments</u>
1	If Waste Accumulation Area is to be indoors, will it be located in a well ventilated area away from day to day foot traffic?	Y	N	NA	
2	If Waste Accumulation Area is to be outdoors, will it be located under a roof and in a fenced or secured area that will prevent unauthorized access?	Y	N	NA	
3	If flammable wastes will be accumulated, is the selected location at least 50-feet from the nearest property line?	Y	N	NA	
4	If flammable wastes will be accumulated, is equipment available (cables, clamps, grounding rods/lugs) to properly ground the containers?	Y	N	NA	
5	If accumulating liquid waste, is equipment available to plug floor drains within 50-feet of the proposed waste accumulation/storage area/	Y	N	NA	
6	Has a fire extinguisher with a ABC rating been located in close proximity to the accumulation/storage area?	Y	N	NA	
7	Has the location of the fire extinguisher been verified as appropriate by the SSO?	Y	N	NA	
8	Is the fire extinguisher included in a routine inspection and maintenance program along with other fire prevention equipment in the facility?	Y	N	NA	
9	Are warning signs posted IAW Figures 4-2 and 4-3 (Also see Attachments 4-2 and 2-3)?	Y	N	NA	
10	Are warning signs clearly readable from 50-feet away?	Y	N	NA	
11	Is a spill kit located in close proximity that has enough absorbent material to clean up a spill that involves the entire contents of the largest container in storage?	Y	N	NA	
12	Is the area setup so incompatible wastes are segregated by a physical separation such as a berm, curb, wall or spill control pallet? See Table 3-1 to determine waste compatibility.	Y	N	NA	

Attachment 4-2: Warning Sign for Waste Accumulation Areas



Attachment 4-3: Warning Sign for Hazardous Waste Storage Building





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# CHECK YOUR HAZARDOUS WASTE STORAGE BUILDING

## COVERED AREA

Prevent rainwater from filling up secondary containment.

## PROPER SIGNS

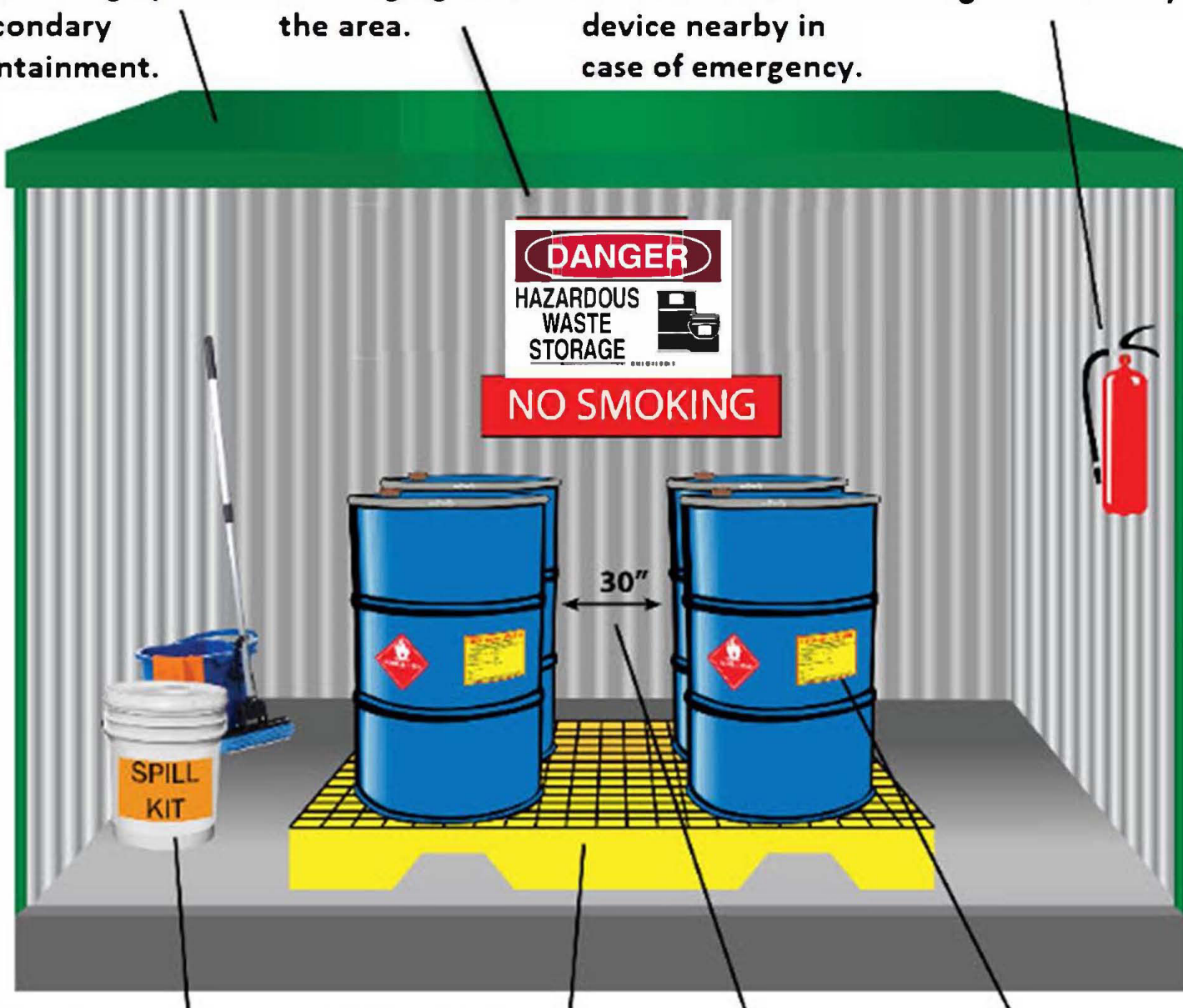
Use appropriate warning signs for the area.

## PHONE

Keep a communication device nearby in case of emergency.

## FIRE PROTECTION

Keep a fire extinguisher nearby.



## SPILL KIT

Keep a spill kit within the area.

## SEGREGATE WASTES

Incompatible waste need to be in a different area to avoid fire or explosion.

## SECONDARY CONTAINMENT

Must contain 10% of the free liquid in all containers or 100% of the free liquid in the largest container, whichever is larger.

## AISLE SPACE

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

## VISIBLE LABELS

All labels must be readable without having to move materials.

# INSPECT YOUR HAZARDOUS WASTE STORAGE BUILDING WEEKLY

## Security

- Bldg. access controlled
- Proper signs are posted

## Containers

- Containers closed/labeled
- Start Date on label

## Spill Control

- Fire Extinguishers present
- Spill kit available

**Questions?** Please call DMNA Environmental Office 518-786-4367/4347

For More information, visit us on line at: [GKO-Environmental Resource Page](http://GKO-Environmental Resource Page)

<https://gko.portal.ng.mil/states/NY/Dept's%20and%20Programs/Enviromental%20Compliance/SitePages/Home.aspx>

# INSPECT YOUR HAZARDOUS WASTE DRUMS

## TIGHTEN BUNGS

Keep bungs tight except when adding waste to the container.

## GROUNDING DRUMS

Prevent igniting flammable waste by grounding drums.

## AISLE SPACE

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



## LATCH FUNNELS

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

## TIGHTEN LIDS

Make sure contents cannot spill if tipped over.

## LABEL IT

Labels must be visible.

## NO LEAKS

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

## SECONDARY CONTAINMENT

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

### CONTAINER MUST BE:

- Marked "Hazardous Waste"
- Maintained at the point of generation
- Under control of operator
- Closed unless being filled

### MAX VOLUME LIMITS:

- 55 Gallons of Hazardous Waste
- 1 Quart of Acutely Hazardous Waste

### WHEN FULL:

- Assigned accumulation start date
- Move to storage within 72 hours

**Questions?** Please call DMNA Environmental Office 518-786-4367/4347

For More information, visit us on line at: GKO-Environmental Resource Page

<https://gko.portal.ng.mil/states/NY/Dept's%20and%20Programs/Environmental%20Compliance/SitePages/Home.aspx>

## Chapter 5 Managing Waste

Sound management and disposal of waste is essential to the success of the NYARNG Pollution Prevention (P2) program. While proper waste management is most often driven by regulatory compliance, reducing or eliminating a waste stream removes the need to manage that waste and is the ultimate form of compliance. In addition, accurate inventory and accounting of waste generation enables management to focus on areas with the highest priorities. Finally, because a primary objective of source reduction is to reduce waste, waste generation must be measured and quantified in order to identify increases or decreases in monthly or annual generation.

This chapter provides an overview of the requirements for HW management within the NYARNG. It also includes Waste Protocol Sheets (WPS) that provides a step-by-step approach for managing specific solid, non-hazardous, universal, and HWs common to the NYARNG. If a waste is not identified in a WPS, contact the HWM for direction. Note that in 2022 a pending New York State regulation entitled the “Generator Improvement Rule” (GIR) had not been officially adopted at the time of this plan update. This GIR is summarized at the end of Chapter 5 and will be incorporated as an addendum to this Chapter once New York State officials propagate the GIR.

### What is a Waste?

This Plan applies to all wastes generated by NYARNG activities that can't be disposed of as normal trash. Some of these waste streams may meet the definition of hazardous waste (HW) under federal and New York State RCRA regulations, and must be managed according to all applicable HW management and disposal regulations.

This Plan also applies to certain state-regulated waste streams that are not included under the federal RCRA regulations. Some of these waste streams are included in this plan because they are routinely generated by the NYARNG or may pose a potential danger if improperly handled.

The NYARNG waste streams subject to this Plan fall into one of the six categories listed below:

- Solid waste
- Hazardous waste
- Recyclable waste
- Universal waste
- Used oil
- PCB waste

**Solid waste** includes all discarded materials, including solids, semi-solids, sludges, liquids, and compressed gases, unless excluded by regulations. A discarded material is any material that is abandoned or recycled, or is considered inherently waste-like (6 NYCRR Part 371.1(c)).

**Hazardous waste (HW)** is a solid waste that is not specifically excluded from regulation as a hazardous waste and meets one of the following criteria:

- It is ignitable, corrosive, reactive, or toxic as measured by standard test methods or as can be reasonably determined by knowledge of generators.
- It is specifically listed as a hazardous waste in 6 NYCRR Part 371.4.

**Recyclable waste** is solid waste that is destined for recycling. Recyclable waste includes office paper, newspaper, cardboard, glass, and scrap metals.

**Universal waste (UW)** includes certain batteries, lamps, mercury-containing devices and discontinued pesticides (6 NYCRR Part 374-3.1).

**Used oil** is any oil, whether refined from crude oil or synthetically produced, that has been used and is therefore contaminated with physical or chemical impurities.

**PCB waste** includes wastes containing 50 parts per million (ppm) by weight or greater of Poly Chlorinated Biphenyls (PCBs). Waste that may contain PCBs include dielectric fluids and heat transfer fluids typically contained in electrical transformers, lighting ballasts and small capacitors. The NYARNG typically does not test wastes for PCB content unless a suspected source is present that has come into contact with the waste. In general, ballasts and capacitors are assumed to contain PCB oil unless they are clearly labeled “No PCBs” by the manufacturer.

## **How Do You Know Your Waste is Hazardous Waste?**

Waste determination is a term that describes the process of determining if a waste meets the HW definition. This is accomplished through laboratory analysis or by applying user knowledge (usually from a SDS) of the chemical composition, hazardous characteristics and the process that generated the waste. The information gathered by analytical testing or process knowledge is compared to the characteristics and waste lists described below (See Figure 5-1). Further information on characteristics of HW can be located at the following web links:

- <https://govt.westlaw.com/nycrr/Document/I4eac9d18cd1711dda432a117e6e0f345?contextData=%28sc.Default%29&transitionType=Default&bhcp=1> ; and
- <https://www.dec.ny.gov/> for listed HW as described in the NYS DEC regulations 6 NYCRR Part 371.

See Figure 5-1 for the characteristics that make a waste hazardous and the classifications of listed wastes that are hazardous.

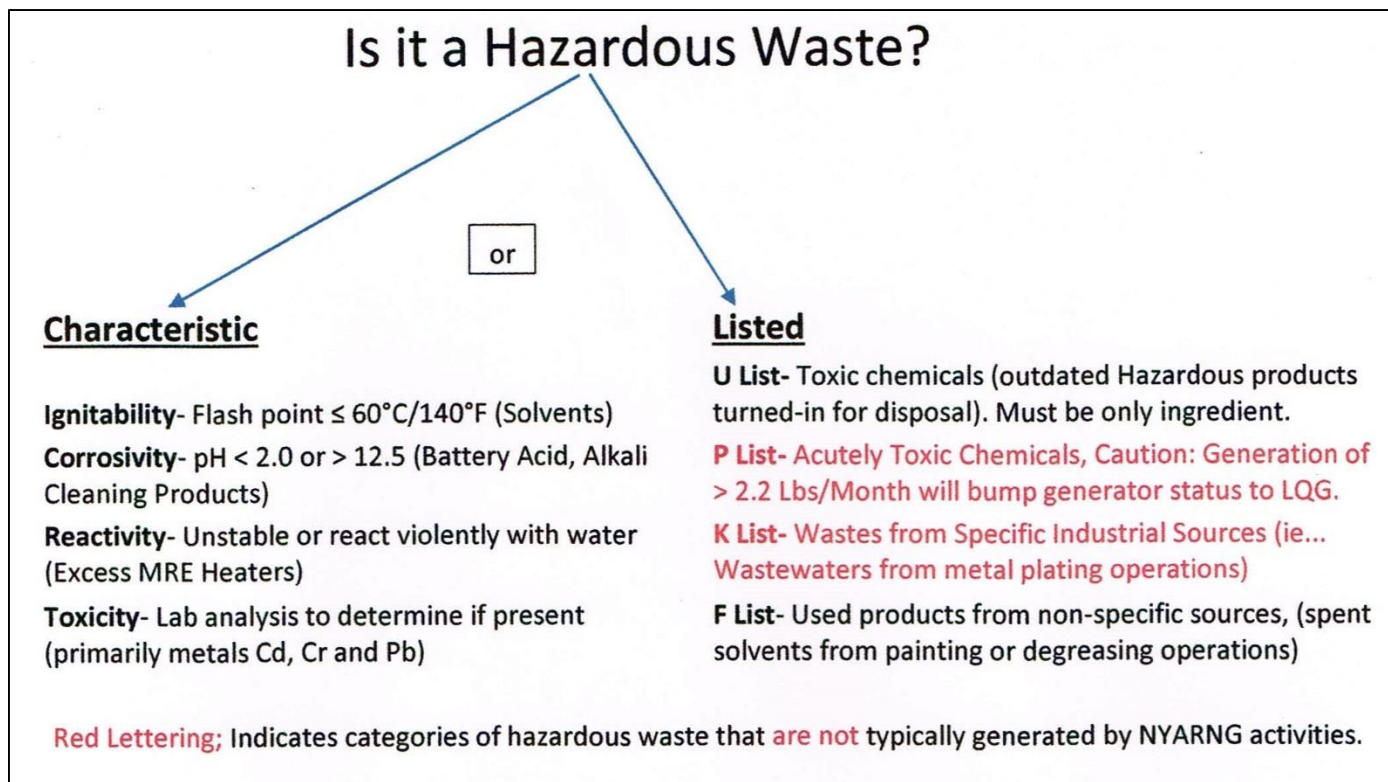
Each waste determination must be recorded and kept on file. Once a waste determination is made, it can be used each time the same waste is generated, as long as there is no change to the materials making up the waste and the process that generated the waste remains the same.

**Note:** All waste determination records must be maintained for at least three years from the date the waste was last sent off site.

Waste determination, using knowledge of materials, can be accomplished through the use of SDSs. However, in some cases, SDSs do not include chemicals that make up less than 1% of the total constituents of the material. Therefore, in some cases, using knowledge of materials and process to characterize a waste as non-hazardous may be inadequate.

When a “waste” is an unused product, SDSs are helpful in determining whether a waste is hazardous based upon their physical properties: however, if a waste is generated during a “process” and meets the definition of “spent material”, the SDS cannot be the only source used to determine if the waste is hazardous. Depending upon the process used, other factors (such as what contaminants were introduced during the process) will have to be considered. In these cases analytical testing must be performed on the waste. If this waste stream is generated on a regular basis (using the same material and process), the waste characterization will remain the same each time the waste is generated.

**Figure 5-1: Characteristic and Listed Hazardous Wastes**






To determine if your waste is hazardous complete the following steps:

STEP 1. Refer to the [WPSs](#) at the end of Chapter 5 to see if a waste determination has already been done for your waste. Look in the contaminants of

concern/characterization section for a waste classification (hazardous, non-hazardous, universal waste, etc.).

Figure 5-2: Sample Waste Protocol Sheet (WPS)

ABSORBENTS from SPILLS of HAZARDOUS PRODUCTS (Hazardous Waste)		1
<b>GENERAL REQUIREMENTS</b>		
<p>This waste stream includes used absorbent materials consisting of the following:</p> <ul style="list-style-type: none"> <li>Any absorbent material (paper, fabric or granular clay) used to cleanup spills of flammable or corrosive HC products.</li> <li>Any absorbent material used to clean-up hazardous organic solvent waste as defined by RCRA (i.e., F-listed or U-listed chemicals).</li> <li>These types of used absorbent must be collected separately for disposal as described below.</li> <li>Wear eye, hand, and clothing protection when handling HW absorbents.</li> </ul> <p><b>Note:</b> Used absorbents that are contaminated with POLs can be disposed of as Non-Hazardous Waste (See WPS 2, Absorbents, Non-Hazardous). Collect POL-contaminated absorbents in a separate collection drum from absorbents used to cleanup spills of flammable fuel or other HC products.</p> <ul style="list-style-type: none"> <li>Segregate absorbents by hazard class of the spilled material. Keep waste materials used to absorb flammable solvents separate from waste materials used to absorb corrosive liquids (acids or bases).</li> <li>This waste stream may require additional evaluation by the waste disposal vendor (including possible sampling and analysis), to determine if it meets the HW definition.</li> <li>The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.</li> </ul>		
<b>Step 1   Select an Approved Container</b>		
<div style="display: flex; align-items: flex-start;"> <div style="text-align: center; margin-right: 10px;">  </div> <p>In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.</p> <p><b>Check:</b> To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.</p> <p><b>Approved Containers:</b> Collect Hazardous Waste Absorbents in open top (removable-head) steel drums.</p> <ul style="list-style-type: none"> <li>New (removable head) drums can be ordered by NSN (See Table 5-3).</li> <li>Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.</li> </ul> </div>		
<b>Step 2   Mark the Container with the Following Information as Shown</b>		
Required Drum Markings:	<p>(Use Pre-Printed Sticker or Write "Hazardous Waste" on Drum with Permanent Marker)</p> <div style="text-align: center;">  </div>	
Fill-in Contents Line and *ASD on Sticker or Write on Drum:	<p><b>Used Absorbents (name of Spilled HC)</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

STEP 2. If no WPS is available and the waste is an **unused Product**, gather the SDS(s) for the product(s) that make up the waste stream and continue on to Step 3. If not, skip to Step 6.

**Note:** *Product waste – Consists of unused hazardous material or product, usually in its original packaging.*

STEP 3. Review the SDS for information that indicates if the material has one or more of the characteristics of a HW (ignitability, corrosiveness, reactivity, or toxicity) or the chemical is called out by name on a EPA list of hazardous waste (See Figure 5-1). If unsure, contact the HWM for assistance.



STEP 4. Handle, label and mark waste containers as described in the WPSs included at the end of Chapters 5, and turn-in for disposal IAW Chapter 6.

STEP 5. If the SDS does not provide all of the information necessary to make a waste determination, then the waste must be sampled and analyzed.

STEP 6. If no WPS is available, or if the waste is generated by a **Process**, then the waste must be sampled and analyzed.

***Note:** Process waste – waste generated as the result of some industrial activity or process, usually at a maintenance shop (e.g., oil/water separator (OWS) sludge, spent parts washer fluid and filters, used paint barrier paper and debris, contaminated soil).*

STEP 7. To request that one or more waste containers be sampled and analyzed, contact one of NYS DMNA's approved contracted waste vendors (**tenants on bases may contact their base environmental office for guidance**). As per the vendors waste contract, vendors will;

- Sample and analyze your waste at an accredited laboratory in order to determine proper waste characterization.
- Return analytical results to you (typically within two weeks).

STEP 8. The analytical results will assist in determining if your waste is hazardous.

- Keep a copy of the laboratory results on file at your facility, they are subject to inspection.
- If you have any questions regarding analytical sampling, testing or waste characterization, please contact the HWM.

STEP 9. Waste containers must be properly labeled while awaiting analytical results;

- Place a hazardous waste label on the container as shown in Figure 5-2, or write the words HAZARDOUS WASTE directly on the container.
- Mark each container with its contents, the ASD, and the words "Awaiting Analysis."
- Place containers awaiting analysis, or for which analytical results are pending in a Hazardous Waste Storage Building (HWSB).

## **How Much Waste Can I Accumulate and For How Long?**

Because federal and state regulations require that all HW be shipped off site within specific time limits, these wastes can be accumulated on site for only a limited amount of time. How much waste an activity can accumulate before shipping it off site depends on the activity's generator status.

Under the New York Compilation of Codes, Rules, and Regulations (NYCRR) Hazardous Waste Management System, there are three categories of HW generators:

- Very Small Quantity Generators (VSQGs), previously referenced to as Conditionally Exempt Small Quantity Generators (“CESQG”);
- Small Quantity Generators (SQGs); and
- Large Quantity Generators (LQGs).

Generator status depends on the quantity of waste generated per calendar month. The table below shows limits for all three (3) types of generators:

**Table 5-1: Time and Quantity Limits for Generators of Hazardous Waste**

Generator Status	Time Limit	Maximum Generated Per Month	Maximum Accumulated On Site
VSQG	No time limit	<220 lbs <2.2 lbs acute haz (P-list) <220 lbs spill residue	2,200 lbs
SQG	180 days or 270 days if shipping over 200 miles	>220 lbs -<2,200 lbs <sup>1</sup> from 220 to <2,200 lbs 2.2 lbs acute haz (P-list) < 220 lbs spill residue <sup>2</sup>	13,200 lbs  2.2 lbs (acute haz)
LQG	90 days	2,200 lbs or more > 2.2 lbs (acute haz, P-list) > 220 lbs or more spill residue <sup>3</sup>	No Maximum Accumulation Limits

- 1 SQGs can generate a maximum average amount of 220 lbs per month, and never more than 2,200 lbs in any one-month.
- 2 SQGs can generate 220 lbs of any residue or contaminated soil, waste, or other debris resulting from the cleanup of a spill, into or on any land or water.
- 3 UW and waste being recycled does not count toward these quantity limitations at either LQGs or SQGs.

---

**CAUTION!**

UECOs working at the same facility must communicate with each other to ensure the facility does not exceed their generator category.

---

Facilities that generate Hazardous Waste are required to obtain an identification number through the EPA in order to treat, store, dispose of, transport, or offer for transportation their HW. The state HWM obtains EPA identification numbers on behalf of any NYARNG hazardous waste generators as required. Listed in Table 5-2 are the EPA generator identification numbers for maintenance and warehouse facilities operated by the NYARNG.

Table 5-2 includes the NYARNG EPA ID Numbers.

**Table 5-2: EPA ID Numbers for NYARNG Facilities**

Facility	Address	EPA ID#
AASF #1	Macarthur Airport Ronkonoma, New York 1179-7302	NYD981179146
AASF #2	76 Patriot Way Rochester, New York 14624-5102	NY1211836357
AASF #3	330 Old Niskayuna Road Latham, New York 12110-2224	NYD981186851
CSMS A	Camp Smith Bldg.124, 11 Bear Mt Bridge, Cortlandt Manor, New York 10567-5000	NYD986889806
CSMS B	60 Slosson Avenue Staten Island, New York 10314-2518	NYD981495195
CSMS C	1500 East Henrietta Road Rochester, New York 14623-3181	NY4210022279
USP&FO Warehouse	Bldg. 145 Watervliet Arsenal Watervliet, New York 12189-4050	NYR000094078
FMS #1	27 Masten Avenue Buffalo, New York 14204-1907	NYD981561665
FMS #2	34 Porter Ave & Front Street Jamestown, New York 14701-6222	NY7211836195
FMS #3	251 Rudy Chase Drive Glenville, NY 12302-7104	NYR00022710
FMS #4	174 South Street Auburn, New York 13021-5398	NYD982189185
FMS #5	6901 Thompson Road Syracuse, New York 13211-1300	NYR000073015
FMS #6	1705 Parkway East Utica, New York 13501-5424	NYD981185929
FMS #7	# 7 Armory Drive Kingston, New York 12401-2099	NYD981185127
FMS #9	93-05 168th Street Jamaica, New York 11433-1286	NYD981076540
FMS #10	184 Connecticut Street Buffalo, New York 14213-2485	NYD981874001
FMS #13	85 West End Avenue Binghamton, New York 13905-3899	NYD981185911
AFRC	25 Baiting Place Road Farmingdale, New York 11735-6201	NYD980775605
FMS #15	59 Stone Quarry Road Queensbury, New York 12804	NYR000172841
FMS #16	330 Old Niskayuna Road Latham, New York 12110-2224	NY2211836000

Facility	Address	EPA ID#
FMS #17	137 Glenmore Road Troy, New York 12180-8398	NYD982189193
<b>Armories</b>		
NYS Armory	355 Marcy Avenue Brooklyn, NY 11206	NYD980776561
NYS Armory	300 Main Street Geneva, NY 14456-2698	NYR000117903
NYS Armory	87 Washington Street Gloversville, NY 12078-3952	NY0000101337
NYS Armory	100 Seneca Street Hornell, New York 14843-1306	NY0000101345
NYS Armory	1765 Hanshaw Road Ithaca, New York 14850-9105	NYR000106146
NYS Armory	2366 5th Avenue New York, New York 10037-1028	NY0000452995
NYS Armory	68 Lexington Ave New York, New York, 10010-1897	NY2170018301
NYS Armory	158 Willow Street Lockport, New York 14094-4838	NYD981179765
NYS Armory	16 Fairground Road RD 1 Box 90A Morrisonville, New York 12962-9711	NY0000939249
NYS Armory	225 Elizabeth Street Ogdensburg, New York 13669-1603	NYR000160002
NYS Armory	119 Times Square Olean, New York 14760-2737	NYR000005603
NYS Armory	84 Old Orangeburg Road Orangeburg, NY 10962-1128	NY0000101352
NYS Armory	955 Washington Street Peekskill NY 10566	NYD980778344
NYS Armory	55 South Street Walton, New York 13856-1438	NYR000117937
NYS Armory	61 Lake Avenue Saratoga Springs, New York 12866-2315	NY0001015429
NYS Armory	5044 State Rd Rt. 3 Saranac Lake, New York 12983-2112	NYR000182501
NYS Armory	99 South Lake Avenue Troy, New York 12180	NYR000161562
NYS Armory	2 Quincy Place Yonkers, NY 10701-2708	NYR000174599
Youngstown Training Area	Balmer & Port Center Rd Block 1 Lot 32.1 Youngstown, NY 14131	NY6570024624

## Selecting and Preparing a Container

Only certain containers are authorized for waste accumulation. Containers used to accumulate and transport HW must be approved by the DOT. Table 5-3 lists approved containers available via NSN.

**Table 5-3: Approved Containers**

Container Type	NSN*
55-Gallon Non-removable-Head Drum, Steel	8110-00-292-9783
55-Gallon Non-removable Head Drum, Polyethylene	8110-01-150-0677
30-Gallon Non-removable-Head Drum, Steel	8110-01-447-2937
30-Gallon Removable-Head Drum, Steel	8110-00-366-6809
20-Gallon Removable Head Drum, Steel	8110-00-146-1588
9-Gallon Removable-Head Drum, Steel	8110-00-254-5715
85-gallon Removable Head Disposal Drum, Unlined	8110-01-101-4055
85-gallon Removable Head Recovery Drum	8110-01-101-4056
Box, Fiber (cardboard); 18" x 12" x 10"	8115-00-179-0579
Fluorescent Bulbs Box, Fiber	Order through supply

\* NSNs are provided for ordering purposes only. Suppliers may substitute comparable containers with different stock numbers if the substitute meets DoD supply standards.

To select and prepare your container complete the following steps:

- STEP 1. Using the [WPS](#) for your waste stream, select the appropriate approved container. Look in the approved container section. Drums must be clean and in good condition. All closures (lids, plugs) on waste drums must be kept tightly sealed (except when adding waste material).
- STEP 2. Remove any previous markings and labels from the container or mask over them with paint.
- STEP 3. If the container will be used to accumulate flammable materials, attach a grounding rod to the container by way of a grounding cable. Check the cable to ensure that it is attached to the ground rod before attaching the clips on the other end of the cable to the funnel and safety can.

## Marking the Container

“Marking” containers **IAW EPA regulations** is the act of placing a label or other signage on a container to identify its contents. This section contains procedures for properly “marking” a container. For the purpose of this section, the words “label or labeling” are used to identify the physical item (sticker or marking pen) used to apply markings to a waste container.

**Note:** “Labeling” IAW Department of Transportation (DOT) regulations is the act of applying the appropriate DOT Hazard Class information on containers of HM or HW that are necessary to transport them over public highways.

All containers used to accumulate HW, UW and Non-RCRA Regulated Waste in either SAAs or HWSBs, must be marked IAW this section. Each WPS provides specific marking and DOT hazard class labeling requirements for common NYARNG waste streams. On the [WPS](#), look in the container marking/labeling and handling section for the correct label to use.

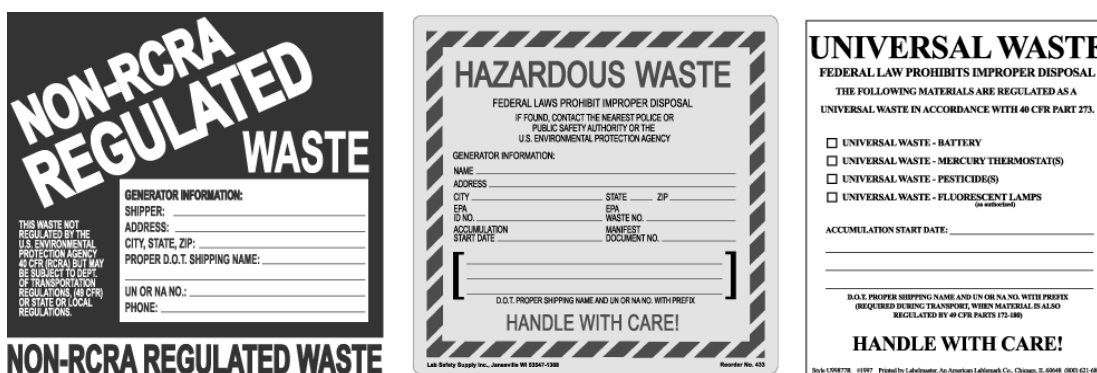
**Note:** Marking labels and DOT hazard class labels are available as peel-off stickers that adhere to the side of a container.

Peel-off Stickers for marking waste containers can be obtained from the HWM (See Figure 5-2).

DOT hazard class labels (as peel-off stickers) can be procured through Class IV supply or provided by the waste transporters contracted by the NYARNG.

STEP 1. Using the [WPS](#) for reference, attach the prescribed marking label for the waste stream to the container.

**Figure 5-3: Examples of Waste Marking (Peel-off) Labels**



**Note:** Marking labels may look slightly different, depending on the manufacturer.

STEP 2. Use an indelible ink marker to complete the following information, if there is a place for it, on the marking label.

- The name, street address, city, state, and zip code of the generator.
- Your EPA ID number.
- The DOT shipping name or UN number (can be found on the WPS).
- For UW labels, check the type of UW accumulated (lamp, battery, mercury thermostat) in the container.

STEP 3. Attach the marking label securely to the side of the container.

- STEP 4. Using the WPS for your waste stream, select the appropriate DOT hazard class labels (See [Figure 3-3](#) and [Table 3-2](#)). Peel-off stickers of DOT hazard class labels can be procured through Class IV supply.
- STEP 5. Attach the DOT hazard class label stickers securely to the side of the container. Alternatively, the waste transporters contracted by the NYARNG can provide and attach the DOT hazard class label stickers to your containers prior to transportation of your waste.

## **Adding Waste to the Container**

These procedures are general instructions that apply to any waste. Some wastes may require special handling. Check the WPS for your waste for specific instructions before adding the waste to the container.

***Note:** If you are disposing of waste generated by a process, it will not have a NSN.*

- STEP 1. For closed head containers, remove the lid or bungs from the container.
- STEP 2. Add the waste carefully. If you are pouring liquids into a drum through a 2” bung opening, use a funnel.
- STEP 3. Replace the lid or bung plugs on the container. Waste container must be tightly sealed except when waste is being added. Funnels must be removed and plugs tightly sealed when finished adding waste to a container.
- STEP 4. When called for by the WPS, record the amount and type of waste being added to the container on the Waste Accumulation Inventory Log as a Best Management Practice (BMP).
- STEP 5. If accumulating HW in a HWSB, the first time HW is added to a container use a permanent ink marker to label the container with the accumulation start date (ASD). Write the ASD directly on the HW marking label.

In SAAs, **DO NOT** mark HW containers with an Accumulation Start Date (ASD) until either 55-gallons have been accumulated or a full container is to be moved to a HWSB.

**Universal Waste - Mark containers of UW (lamps, batteries, thermostats containing Mercury) with an ASD when waste is first placed in the container. An ASD is required as soon as the first universal waste item is placed in the container, regardless of where it is stored.**

- STEP 6. STOP adding waste to a container before it is completely full. Maintain headspace in each waste container as noted in the table below:

**Table 5-4: Container Size and Headspace**

Size of Container	Amount of Headspace
55 gal.	4 inches
30 gal.	3 inches
15 gal.	2 inches
less than 15 gal.	1 inch
Aerosol Can Puncturing Unit Containers (requires additional headspace to operate unit)	25%

## Using Waste Protocol Sheets

Waste management practices can be specific to individual waste streams. These procedures are identified on easy-to-follow guides called Waste Protocol Sheets (WPSs). Each WPS outlines step-by-step procedures that explain how to do the following:

- Select a container for your waste.
- Prepare, mark and label the container.
- Add waste.
- Properly accumulate waste.

This section includes a WPS for each type of waste commonly generated by the NYARNG. To use the WPSs complete the following steps:

- STEP 1. Find your waste in the index at the end of Chapter 5 (See Table 5-5).
- STEP 2. Turn to the applicable WPS.
- STEP 3. Make sure your waste is covered by that WPS. If your waste does not have a WPS or if you cannot find one, contact the HWM.

For example, if you have a used lithium battery, check the list below the title word “Batteries” on the WPS to see if lithium batteries are included. If your waste is not listed in the index, contact the HWM.

**Note:** See Table 5-3 for a list of approved waste containers.

- STEP 4. Read the WPS and follow the instructions for selecting a container, marking the container, adding the waste, and accumulating the waste.
- STEP 5. Follow procedures described in Chapter 6 to turn-in waste containers for proper disposal.



**GENERATOR IMPROVEMENT RULE (PENDING NEW YORK STATE LEGISLATURE APPROVAL) – THIS INFORMATION IS PROVIDED AS REFERENCE FROM NYS DEC’S REGULATION, PLEASE SEE YOUR HW MANAGER FOR FURTHER CLARIFICATION IF NECESSARY.**

*In 2022, New York adopted the Hazardous Waste Generator Improvements Rule (GIR) which incorporated 81 FR 85732, Published November 28, 2016. New York incorporated the GIR under NYCRR Parts 370, 371, 372, 373, 374 and 376.*

*Below is a summary of GIR and the changes that impact NYARNG facilities.*

*More stringent Provisions Include:*

- *SQGs and LQGs must re-notify.*
- *SGQs and LQGs must indicate the hazards of the contents when labeling containers and tanks.*
- *LQG contingency plan must include a quick reference guide.*
- *LQG that cannot “clean close” their facility or accumulation unit, must close the unit or facility as a landfill.*

*Less stringent Provisions:*

- *VSQG allowed to send waste to LQG if both are under control of the same person (Consolidation of VSQG Waste).*
- *VSQGs and SQGs are allowed to conduct episodic events, provided that certain conditions are met.*
- *LQGs are allowed to seek a waiver from the 50-foot setback requirement for ignitable or reactive hazardous waste.*

*Hazardous Waste Determinations under the GIR are summarized below.*

*A person who generates a solid waste, as defined in section 371.1(c)(1) of this Title, must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations:*

- *at the point of waste generation;*
- *before any dilution, mixing, or other alteration of the waste occurs; and*
- *at any time in the course of its management that it has, or may have, changed its properties as a result of exposure to the environment or other factors that may change the properties of the waste such that the RCRA classification of the waste may change.*

*The Determination Process incorporates the following:*

- *Is it excluded under 371.1(e);*
- *Is it listed in 371.4? Must use knowledge of the waste. Acceptable knowledge “may include waste origin, composition, the process producing the waste, feedstock, and other reliable and relevant information.”;*
- *Does it exhibit one or more characteristics?;*
- *Use knowledge or testing; acceptable knowledge is described;*
- *When available knowledge is inadequate to make an accurate determination, must test the waste using a method set forth in the regulations or other method approved by the Department. (In NY, ELAP certified lab); and*
- *Testing, when properly performed, is definitive.*

*The recording keeping process under the GIR is analogous to 372.2(c)(1)(iii) and (v) and includes the following:*

- *Applies to small and large quantity generators;*
- *Maintain records supporting determinations, including records that identify whether a solid waste is a hazardous waste;*
- *At least three years from when the waste was last sent for treatment, storage or disposal;*
- *Records comprise generator's knowledge and support the determination; and*
- *The periods of record retention are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the department.*

*Other changes associated with the GIR include:*

- *Generators may manage non hazardous wastes as hazardous wastes if they choose;*
- *While awaiting test results, generators must manage potential hazardous waste as hazardous waste;*
- *If a waste is determined to be hazardous, SQGs and LQGs must identify all applicable hazardous waste codes; and*
- *Clarifies how mixing of hazardous waste and non-hazardous waste impacts generator category (40 CFR 262.13).*

*For a VSQG, the mixing of hazardous waste and non-hazardous waste requires the following:*

- *If mixture does not exhibit HW characteristics, mixture can exceed VSQG quantity limits; and*
- *If mixture exhibits HW characteristics, mixture is a newly generated waste, and total amount counts towards monthly generation.*

*For SQGs and LQGs, the mixing of hazardous and non- hazardous waste requires the following:*

- *Mixing is a form of dilution "unless the solid waste provides a useful contribution to decharacterizing the waste instead of just diluting" (see 81 FR 85756, 261.13(f)); and*
- *Generator can't dilute as a substitute for effective treatment (LDRs -268.3(a)).*

Note that generator categories can change from month to month as summarized in the table below.

TABLE 1 to 40 CFR §262.13—Generator Categories Based on Quantity of Waste Generated In A Calendar Month (Source: USEPA)

Quantity of acute hazardous Waste generated in a calendar month	Quantity of non-acute hazardous waste generated in a calendar month	Quantity of residues from a cleanup of acute hazardous waste generated in a calendar month	Generator Category
> 1 kg	Any amount	Any amount	<b>LQG</b>
Any amount	≥ 1,000 kg	Any amount	<b>LQG</b>
Any amount	Any amount	> 100 kg	<b>LQG</b>
≤ 1 kg	> 100 kg and < 1,000 kg	≤ 100 kg	<b>SQG</b>
≤ 1 kg	≤ 100 kg	≤ 100 kg	<b>VSQG (CESQG)</b>

Below is a summary of the GIR as it relates to Very Small Quantity Generators (VSQG).

- Most regulations are unchanged;
- Adopting new EPA definition of VSQG –can’t be in different categories for acute vs non-acute HW;
- Make hazardous waste determination; determine generator category;
- Send the hazardous waste to an authorized facility; and
- Ensure delivery –by self-transporting up to 100 kg (220 lbs.) in any shipment or using a Part 364 hauler (may change to 500 lbs. or 55 gallons).

With respect to the Pharmaceuticals Rule, the following changes were adopted:

- VSQGs may ensure delivery to Reverse Distributors for potentially creditable hazardous waste pharmaceuticals, or
- VSQGs may ensure delivery to a healthcare facility under the same control for hazardous waste pharmaceuticals.
- Landfill prohibition of bulk liquids

<b>Consolidation of VSQG Waste</b>	
<b>Topic</b>	<b>GIR requirements</b>
Who is exempt from TSDf permitting?	LQGs under control of the same “person”
Part 360 requirements	Must meet 360 as well
Notification – LQG	File notification of Hazardous Waste Activity with EPA (30 days prior to accepting waste)
Labeling – VSQG	VSQGs label the waste as “hazardous waste” and indication of hazards.
Recordkeeping	LQG maintains records of shipments received from the VSQGs for 3 years

<i>Accumulation Time Limit at LQG</i>	<i>90 day clock for the VSQG waste begins when waste is received from the VSQG</i>
<i>Other</i>	<i>Comply with all LQG requirements for that waste and their own generated HW, even if they would otherwise be a VSQG or SQG</i>

*Consolidation of VSQG Waste involves the following:*

- *Adjustment of maximum amount of VSQG hazardous waste which may be self-transported (Part 364 currently allows only 220 lbs.); and*
- *Requires the VSQG consolidation notification to include the EPA ID number for any VSQG who has already obtained one.*

*The GIR incorporated the following provisions for Satellite Accumulation Areas (SAAs):*

1. *Requirements for incompatible wastes – 40 CFR 262.15 (a)(3);*
2. *Additional exceptions to keeping containers closed at all times;*
3. *Clarified what is meant by “remove excess waste from the SAA within 3 days” – means 3 calendar days;*
4. *Providing maximum weight for accumulation of acute hazardous waste in an SAA – 2.2 lbs. for solids;*
5. *Clarified how excess waste may be managed – 40 CFR 262.15(a)(6);*
6. *Extension of the preparedness, prevention, and emergency procedures provisions for SQGs and LQGs to SAAs;*
7. *Rescinded memo allowing reactive HW to be stored in SAA away from the point of generation; and*
8. *Clarified term “Under the Control of the Operator”.*

*GIR requires that SQGs and LQGs mark or label with an indication of the hazards of the contents. Options include, but aren’t limited to:*

- *Hazardous waste characteristic(s);*
- *DOT hazard communication consistent with 49 CFR 172 Subpart E or F; or*
- *OSHA Hazard Communication Standard consistent with 29 CFR 1910.1200*

*These requirements also apply to containers in Satellite Accumulation Areas*

Examples of labels to be used in SAA are summarized below.



*New Labeling: Where It Applies*

Satellite Accumulation Area	SQG	LQG
Containers	Containers	Containers
	Tanks	Tanks
	Containment Buildings	Containment Buildings

The GIR clarifies regulations regarding SQGs with respect to drip pads and containment buildings:

- SQGs must comply with the technical standards of Subparts W and DD, but otherwise comply with SQG regulations; and
- Clarified that VSQGs may accumulate on drip pads if they comply with 40 CFR part 265 subpart W;

FOR SQGs, Preparedness and Planning involves the following:

- Emergency planning and preparedness requirements apply where hazardous waste is being generated or accumulated at the generator’s site—including points of generation, satellite accumulation areas, and central accumulation areas (180-day areas);
- May determine the most appropriate locations for emergency equipment, when it is not possible or unsafe to have the equipment located immediately next to the generating equipment;
- “Immediate access” definition includes “direct or unimpeded access;”
- Relevant emergency response information should be posted next to the telephone;
- SQGs may use contractors to address releases; and
- One-Plan is still applicable for generators under multiple statutes.

*SQG Arrangements with Emergency Responders involves the following:*

- *Document that they have attempted to make arrangements with local responders, and keep the records;*
- *Large facilities with internal response capabilities may seek a waiver from arrangements with local authorities; and*
- *More flexibility with respect to form or type of documentation, and where documentation can be retained.*

*SQG Recordkeeping and Reporting addresses the following:*

- *Episodic events;*
- *Tanks –demonstrate tank is emptied every 180 days; and*
- *Arrangements with local authorities –maintain in operating record.*

*If the SQG is Demonstrating Tanks are Emptied Every 180 Days, the following methods are approved:*

- *May use logs, monitoring equipment or other records;*
- *Regulations address both batch and continuous flow processes; and*
- *Records kept on site, readily available for inspection.*

*SQG re-notification is summarized as follows:*

- *Renotify starting in 2022, and every four years;*
- *By September 1<sup>st</sup> of that year;*
- *Use EPA Form 8700-12;*
- *States may allow electronic reporting; and*
- *States may require more frequent re-notification.*

**Table 5-5: Waste Protocol Sheet (WPS) Index**

WPS #	Waste Type	Page #
1	Absorbent, from Spills of Hazardous Products (Hazardous Waste)	5-22
2	Absorbent, POL Contaminated (Non-Hazardous Waste)	5-25
3	Acetylene, Compressed Gas (Hazardous Waste)	5-27
4	Adhesives (Hazardous and Non-Hazardous Wastes)	5-29
5	Aerosol Products (Hazardous Waste)	5-31
6	Aerosol Can Puncturing (Hazardous Waste)	5-33
7	Alcohols (Hazardous Waste)	5-37
8	Antifreeze, Used (Recycled Waste)	5-39
9	Asbestos Containing Materials (Non-Hazardous Waste)	5-41
10	Batteries, Lead-Acid Automotive (Recycled Waste)	5-43
11	Batteries, Misc Non-Automotive (Universal Waste)	5-45
12	Blasting Sand and Beads, Used (Hazardous Waste)	5-51
13	Brake Fluid – Synthetic (Recycled Waste)	5-53
14	Brake Washing Solutions and Filters (Hazardous Waste)	5-55
15	Cleaner, Lubricant and Preservative (CLP) (Non-Hazardous Waste)	5-59
16	Decon Chemicals, (DS2, STB) (Hazardous Waste)	5-61
17	Electronic Scrap (E-Scrap) (Recycled Waste)	5-63
18	Ether, Compressed Gas and Aerosol (Hazardous Waste)	5-65
19	Filters, Fuel (JP8 and Mogas) (Hazardous Waste)	5-67
20	Filters, Oil and Diesel Fuel (Non-Hazardous Waste)	5-69
21	Fuel, Contaminated or Unserviceable (Hazardous Waste)	5-71
22	Fire Extinguishers (Recycled Compressed Gas Cylinders)	5-74
23	Grease, GAA (Non-Hazardous Waste)	5-76
24	Lamps, Used: Fluorescent and Other (Universal Waste)	5-78
25	Lead Scrap (Recycled Waste)	5-80
26	Mercury-Containing Devices (Universal Waste)	5-82
27	MRE Heaters, Unused (Hazardous Waste)	5-84
28	NBC Defense Kits and Equipment (Hazardous and Non-Hazardous Wastes)	5-86
29	Oil, Used (Recycled Waste)	5-92
30	Oil/Water Separator and Washrack Sludge (Hazardous and Non-Hazardous Wastes)	5-94
31	Oxygen, Compressed Gas (Recycled Waste)	5-96
32	Paint Booth Filters (Hazardous Waste)	5-98
33	Paint and Primer, Oil-Base (Hazardous Waste)	5-102
34	Paint and Primer, Water-Base (Non-Hazardous Waste)	5-105
35	Parts Washing Solutions and Filters (Hazardous Waste)	5-107
36	PCB-Containing E-Scrap (State of NY: Hazardous Waste)	5-111
37	Pesticide Products (Hazardous Waste)	5-115
38	Potassium Hydroxide Solution (Hazardous Waste)	5-117
39	Shop Rags and Towels, Laundry Service (Recycled Waste)	5-119
40	Weapons Cleaning Rags & Patches, Used (Hazardous and Non-Hazardous Waste)	5-123
41	Wood, Treated (Non-Hazardous Waste)	5-125

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# ABSORBENTS from SPILLS of HAZARDOUS PRODUCTS (Hazardous Waste)

1

## GENERAL REQUIREMENTS

This waste stream includes used absorbent materials consisting of the following:

- Any absorbent material (paper, fabric or granular clay) used to cleanup spills of flammable or corrosive HC products.
- Any absorbent material used to clean-up hazardous organic solvent waste as defined by RCRA (ie... F-listed or U-listed chemicals).
- These types of used absorbent must be collected separately for disposal as described below.
- Wear eye, hand, and clothing protection when handling HW absorbents.

**Note:** Used absorbents that are contaminated with POLs can be disposed of as Non-Hazardous Waste (See **WPS 2, Absorbents, Non-Hazardous**). Collect POL-contaminated absorbents in a separate collection drum from absorbents used to cleanup spills of flammable fuel or other HC products.

- Segregate absorbents by hazard class of the spilled material. Keep waste materials used to absorb flammable solvents separate from waste materials used to absorb corrosive liquids (acids or bases).
- This waste stream may require additional evaluation by the waste disposal vendor (including possible sampling and analysis), to determine if it meets the HW definition.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.

**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

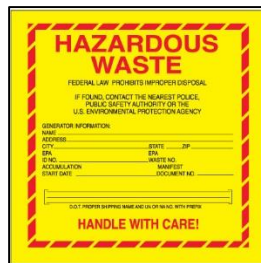
**Approved Containers:** Collect Hazardous Waste Absorbents in open top (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with the Following Information as Shown

Required Drum Markings:

(Use Pre-Printed Sticker or Write “**Hazardous Waste**” on Drum with Permanent Marker)



Fill-in Contents Line and \*ASD on Sticker or Write on Drum:

**Used Absorbents (name of Spilled HC)**




\* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See note in Step 1 above for information on separation of POL contaminated, Non-Hazardous Waste Absorbents (as described in WPS 2) from Hazardous Waste Absorbents as described in this WPS.</li> <li>• As a P2 option, use only light-weight absorbent pads when HW Absorbents will be generated. Only use heavy (granular clay) for absorbing POL products.</li> <li>• When utilizing absorbents to clean up a chemical product, see the WPS for that product (ie... adhesives, alcohols, antifreeze), for additional product-specific disposal information.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All HW containers must be kept closed and sealed (ring and bolt tightened), except when adding waste.</b></li> <li>• Open waste collection drums slowly, keeping your head/face away from the opening.</li> <li>• Add HW absorbents to the collection drum.</li> <li>• Replace lid and seal top ring with nut/bolt. HW containers must be closed/sealed except when adding waste.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added). <ul style="list-style-type: none"> <li>○ See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.</li> </ul> </li> <li>• If waste is accumulated (added to a drum) in a HWSB, fill-in the ASD when waste is first put into the drum. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a pickup of HW is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of Hazardous Absorbents.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

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# ABSORBENTS, POL CONTAMINATED

(Non-Hazardous Waste)

GENERAL REQUIREMENTS		
<ul style="list-style-type: none"> <li>• This waste stream includes used absorbent materials consisting of the following:                             <ul style="list-style-type: none"> <li>○ Any absorbent material (paper, fabric or granular clay) that become contaminated with POL products through normal operations or spill cleanup activities.</li> </ul> </li> <li>• These types of used absorbent must be collected separately for disposal as described below.</li> <li>• Wear eye, hand, and clothing protection when handling POL contaminated used absorbents.</li> </ul> <p style="background-color: yellow; padding: 5px;"><b>Note:</b> Used absorbents that are contaminated with hazardous products such as flammable or corrosive liquids may need to be disposed of as Hazardous Waste (See <b>WPS 1, Absorbents, Hazardous</b>). These types of used absorbents must be segregated from absorbents contaminated with POL products (collected in a separate collection container).</p> <ul style="list-style-type: none"> <li>• The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.</li> </ul>		
Step 1   Select an Approved Container		
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;">  </div> <div> <p>In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.</p> <p><b>Check:</b> To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.</p> <p><b>Approved Containers:</b> Non-Hazardous Waste absorbents generated in small amounts can be collected in clear plastic trash bags (triple bagged). Larger quantities are collected in open (removable-head) steel drums, triple lined with three clear plastic trash bags.</p> <ul style="list-style-type: none"> <li>• New (removable head) drums can be ordered by NSN (See Table 5-3).</li> <li>• Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.</li> </ul> </div> </div>		
Step 2   Mark Containers with the Following Information as Shown		
<p>Required Container Markings:</p>	<p>(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> on Bag or Drum with Permanent Marker)</p> 	
<p>Fill-in Contents Line on Sticker or Write on Container:</p>	<p><b>Used POL Absorbents</b></p> <p>No Date is Required.</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See precautionary notes above; Hazardous Waste Absorbents (as described in WPS 1) must be segregated from POL contaminated, Non-Hazardous Waste Absorbents as described in this WPS.</li> <li>• As a P2 option, use light weight absorbents (such as pads, pillows, rags, wipes etc ...) and re-use as much as possible. <ul style="list-style-type: none"> <li>○ If using granular (clay), reuse several times, (until discolored with soaked-up oil), before putting in container for disposal.</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum in close proximity to the area of the shop where waste absorbents are likely to be generated.</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add used non-hazardous absorbents to the collection container.</li> <li>• If using triple plastic bags, tie bag tops closed after adding waste.</li> <li>• If using a drum, replace lid after adding waste. All waste drums must be kept closed (except when adding waste).</li> <li>• Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of non-hazardous waste absorbents; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full (or no more waste will be added), move containers of Non-Hazardous Absorbents to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the disposal contractor.</li> </ul> </li> <li>• As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<b>Waste Pick-ups (See Chapter 6 for Details)</b>	
<ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of Non-Hazardous Absorbents.</li> <li>• Schedule Non-Hazardous Absorbent pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up the Non-Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.</li> </ul>	

# ACETYLENE, COMPRESSED GAS (HAZARDOUS WASTE)

3

## GENERAL REQUIREMENTS

- This waste stream consists of excess or unserviceable gas cylinders that contain Acetylene, a flammable gas typically used in welding operations.
- Acetylene is regulated for disposal as a flammable gas under state and federal solid waste regulations. This chemical can cause pollution when they not properly disposed of.
- Wear eye, hand and clothing protection when handling pressurized gas cylinders.
- Process serviceable cylinders for re-use through a compressed gas vendor (See Step 3 for additional information).
- If the cylinder is unserviceable (and compressed gas vendor will not accept), it must be turned-in to a HW vendor for disposal.

**Note:** A main area of concern with regard to disposal of pressurized cylinders is how they are stored on site while being accumulated for turn-in. See Step 2 below for instructions on how to properly store these items while being accumulated on site awaiting pickup.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container





Establish a collection point in a dedicated area for waste pressurized cylinders that contain (or contained) a flammable gas. Waste accumulation areas must be dry locations. If being picked up by a HW vendor, cylinders are typically stored in the same room/shed as the other waste containers generated on site.

**Note:** Flammable gasses must be stored at least 50-feet away other non-flammable gasses or gasses that support combustion (Oxygen). All pressurized cylinders must be chained to a wall in their upright position with screw-on cap(s) in place while in storage awaiting turn-in.

**Approved Containers:** Outside packaging required for turn-in and transport of pressurized cylinders typically consists of a metal (screw-on) valve protection cover. Smaller cylinders are typically packaged for transport in wooden crates supplied by the waste vendor.

### Step 2 Mark the Cylinder(s) with Following Information as Shown

Required Package Markings:	<p style="text-align: center;"><b>Write Hazardous Waste on Cylinder with Permanent Marker (or use Pre-printed Sticker)</b></p> <div style="text-align: center;">  </div>	<div style="text-align: center;">  </div>
Write-in Accumulation Start Date (ASD);	<p style="text-align: center;"><b>Acetylene, Unserviceable</b></p> <p style="text-align: center;"><b>ASD = Same day the sticker is applied to cylinder</b></p>	<p style="text-align: center;"><b>Use a separate HW sticker on each waste cylinder</b></p>

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Used (empty) cylinders (that have expelled their contents through normal use), are to be refilled/recharged through a compressed (welding) gas supply contractor.</li> <li>• Surplus (unused) cylinder(s) that still contain Acetylene are to be returned to the compressed (welding) gas supplier for re-issue.</li> </ul> <p><b>Caution, Do Not:</b></p> <ul style="list-style-type: none"> <li>➤ Use a compressed gas cylinder as a roller or support.</li> <li>➤ Accept, issue or use a cylinder if the contents are unknown.</li> <li>➤ Allow open flames within 50-feet of a flammable compressed gas cylinder.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• This waste stream consists of unused or unserviceable product and is not typically accumulated for disposal in small batches.</li> <li>• While stored at a NYARNG facility, waste compressed gas cylinders must be stored in an indoor or covered (dry) location that will prevent contact with storm water.</li> </ul>	
<b>Step 5</b>	<b>Store Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Once it is determined that the flammable gas is to be disposed of, the waste cylinder(s) must be moved to a HWSB (or another suitable waste storage location) until they are picked up for disposal. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of hazardous waste acetylene.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# ADHESIVES

## (Hazardous & Non-Hazardous Wastes)

4

### GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream can include HC product(s) that are commonly used in maintenance shops or to maintain NYARNG buildings:
- Unused (excess) or partially hardened (unserviceable) adhesive products
  - Flammable adhesives (flash points  $\leq 140^{\circ}$  F) contain solvents and must be disposed of as HW.
  - Non-flammable (water based) adhesives are considered low hazard materials. Collect waste non-flammable adhesives in a separate container for disposal as Non-Hazardous Waste. This is similar to procedures for disposal of Latex Paint (See **WPS 29**, Paint, Water-Based).

**Note:** Federal and state regulations forbid the practice of drying-out or hardening flammable adhesives for the purpose of disposal.

- Wear eye, hand, and clothing protection when handling containers of waste adhesive.
- Operations that routinely use flammable adhesives, must collect mixing and dispensing materials (such as stir stick and rags), for sampling/testing to determine if they must be disposed of as HW.
- When setting aside for disposal, segregate containers of waste flammable adhesives (hazardous) from waste non-flammable (non-hazardous) adhesives, (See Step 2).
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



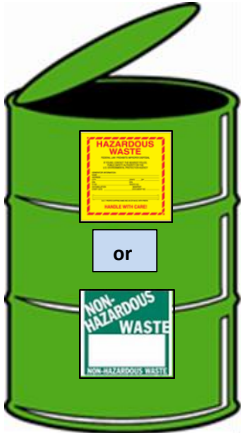


In general, supplies of waste collection containers (drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste adhesives for disposal their original packaging (if sealed) or collect in separate open top (removable-head) drums or pails. Use separate containers (drums or pails) for hazardous (flammable) and non-hazardous (water based) adhesives.

- New (removable head) drums can be ordered by NSN (See **Table 5-3**). Pails can be purchase locally or obtained from the HW vendor.
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

Required Container Markings:	<p><b>Write HAZARDOUS or NON-HAZARDOUS WASTE on Original Container(s) or Drum/Pail with Permanent Marker (or use Pre-printed Stickers as shown)</b></p> <div style="display: flex; justify-content: center; align-items: center; gap: 20px;">  <span>or</span>  </div>	
Fill in Contents and *ASD on sticker or write on container	<p><b>Waste Adhesives</b></p> <p>* For HW Adhesives, See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	



<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See General Requirements section above for information on the different disposal requirements for flammable (solvent based) adhesives vs. non-flammable (water based) adhesives.</li> <li>• A copy of the SDS for each waste adhesive (by NSN and Manufacturer) set aside for disposal, must accompany the container(s) when picked-up by the waste contractor.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste adhesives.</b></li> <li>• Open drums/pails slowly, keeping your head/face away from the opening.</li> <li>• Add containers of waste adhesive to the collection drum/pail.</li> <li>• Replace lid and re-seal top ring with nut/bolt.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a drum of waste adhesive is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD for HW adhesives.</b> Write the ASD on the pre-printed waste sticker (or directly on the drum) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of both hazardous and non-hazardous waste adhesives.</li> <li>• Pickups of HW adhesives will be scheduled so the 180-day maximum hold time for a full container is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous and/or Non-Hazardous Wastes.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous and non-hazardous wastes.</li> </ul>	

# AEROSOL PRODUCTS (Hazardous Wastes)

5

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream includes HC product(s) contained in aerosol cans that are commonly used in maintenance shops and armories or to maintain NYARNG buildings.
- Aerosol products that are unused (excess) or partially used (unserviceable) typically must be disposed of as HW, including;
  - Flammable aerosols (flash points  $\leq 140^{\circ}$  F) containing solvents or POL products, such as spray paints, engine degreasers/cleaners, penetrating oils and adhesives.
  - Corrosive aerosol products, including acids ( $\text{pH} \leq 2.0$ ) such as bathroom cleaners and alkalis ( $\text{pH} \geq 12.5$ ), such as oven cleaners and drain openers.
  - Toxic aerosols with pesticide ingredients, such as insect killers and repellants.

**Note:** Federal and state regulations forbid the practice of venting or releasing flammable or corrosive aerosol products for the purpose of disposal.

- Wear eye, hand, and clothing protection when handling containers of waste aerosol cans.
- When accumulating for disposal, segregate containers of waste aerosol cans by hazard type identified above. Collect flammable, corrosive and toxic waste aerosols in separate containers, (See Step 2).
- **See WPS 6, Aerosol Can Puncturing** for instructions on processing empty aerosol cans for recycling.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 | Select an Approved Container






In general, supplies of waste collection containers (pails) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste aerosol cans for disposal in their original packaging (cardboard box with separators) whenever possible. Otherwise collect in open top (removable-head) pails. Use separate containers for hazardous (flammable) and hazardous (corrosive) aerosols.

- Pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 | Mark the Container with Following Information as Shown

<p>Required Drum Markings:</p>	<p><b>Write HAZARDOUS WASTE on Container with Permanent Marker (or use Pre-printed Stickers as shown)</b></p> 	 
<p>Fill in Contents and *ASD on sticker or write on pail</p>	<p><b>Waste Aerosol Cans</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for each waste aerosol product (by NSN and Manufacturer) added to a collection drum, must accompany the container(s) when picked-up by the hazardous waste contractor.</li> <li>• As a P2 measure, make every attempt to use up aerosol products and take measures to prevent them from becoming unserviceable. This can include simple measures such as; <ul style="list-style-type: none"> <li>○ After use, hold a can of spray paint upside down and spray for 15 seconds. This action clears the nozzle so it will spray again when needed.</li> <li>○ Keep a supply of spare nozzles on hand that can be used as a replacement when one plugs up,</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste aerosol cans.</b></li> <li>• If utilizing original packaging (as shown in Step 2), keep flaps of boxes closed/taped shut.</li> <li>• Storage of aerosol cans must be in a temperature controlled environment.</li> <li>• Actuators must be removed to reduce risk of accidental release.</li> <li>• When collecting in a pail, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste aerosol products to the collection pail.</li> <li>• Replace lid on pail and seal (snap or screw down).</li> <li>• Stop filling pails before completely full. Maintain recommended headspace (2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste aerosol cans is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the box/pail) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste aerosol products.</li> <li>• Pickups of HW aerosol products will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# AEROSOL CAN PUNCTURING

## (Hazardous Waste)

**GENERAL REQUIREMENTS**

- NYARNG facilities with aerosol can puncturing systems can puncture **EMPTY** aerosol cans to render them suitable for recycling as scrap steel. This process must include the collection and proper disposal of any residual aerosol can contents IAW federal and state HW regulations.
- This waste stream includes **empty** aerosol cans from maintenance operations. By regulation, an empty aerosol can must be “at or approaching atmospheric pressure on the inside of the container”. Cans to be punctured can have some remaining pressure but no useable product remaining inside.
- Wear eye, hand, and clothing protection when puncturing aerosol cans.

**Note:** Do Not puncture serviceable (full or nearly full) aerosol HC products that have been identified as excess stock. These products should be offered to other shops for possible reuse before being identified for disposal.

- **See WPS 5, Aerosol Products** for additional information regarding disposal of excess or unserviceable aerosol products (that can't be punctured).
- The waste collected from aerosol can puncturing may require additional evaluation (including possible sampling and analysis) by the waste vendor, to determine waste classification/coding for disposal.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

**Step 1 | Select an Approved Container**

In general, supplies of waste containers (drums/pails) are maintained at NYARNG shops.



**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

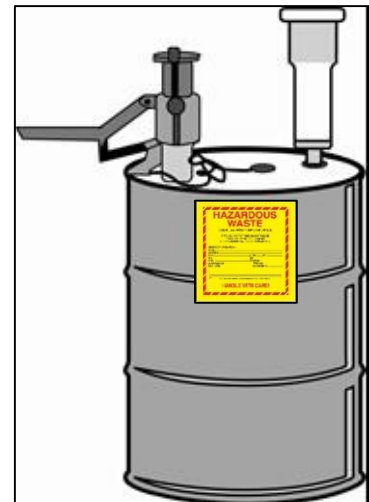
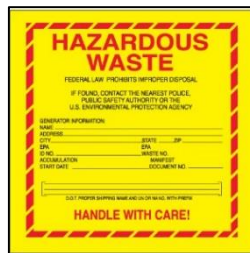
**Approved Containers:** Collect aerosol can residuals in a closed top (non-removable head) steel drums.


- New (non-removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (non-removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

**Step 2 | Mark the Container with the Following Information as Shown**

(Use Pre-Printed Sticker or Write “**Hazardous Waste**” on Drum with Permanent Marker)

Required Container Marking:



<p>Fill-in Contents Line on Sticker or Write on Drum:</p>	<p style="text-align: center;"><b>Aerosol Can Contents (Paint Related Materials)</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	
<p>Fill-in Contents Line on Sticker or Write on Drum:</p>	<p style="text-align: center;"><b>Used Filters (from Puncturing Aerosol Cans)</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	
<p><b>Step 3    Quality Control (General Do and Don'ts)</b></p>		
<p><b>Caution:</b> Not all aerosol products are compatible with the puncturing process. Contact the HWM for additional guidance on which products can be mixed together in the same collection drum</p> <ul style="list-style-type: none"> <li>• <b>DO PUNCTURE</b> the following types of aerosol HC products: <ul style="list-style-type: none"> <li>○ Most Flammable or Combustible aerosol products can be mixed together in the same collection drum, including (but not limited to) spray paints, engine cleaners/degreaser, lubricants and penetrating oils.</li> </ul> </li> <li>• <b>DO NOT PUNCTURE</b> the following aerosol HC products:: <ul style="list-style-type: none"> <li>○ Corrosive (acidic or alkali) aerosol HC products (typically bathroom or oven cleaners). Check SDS for product pH, (pH &lt;2 = acid, pH &gt;12.5 = alkali).</li> <li>○ Toxic aerosol pesticide products (such as bug killers and repellants).</li> </ul> </li> <li>• When the filter canisters on collection drums are changed-out, they must be tested to determine if they are HW. <ul style="list-style-type: none"> <li>○ Used filters that exceed thresholds for toxic metals such as Cadmium and Lead, shall be accumulated in an approved container and disposed of as HW.</li> <li>○ Used filters that do not exceed thresholds for toxic metals can be disposed of as normal trash.</li> </ul> </li> </ul>		
<p><b>Step 4    Waste Accumulation Information</b></p>		

- **Maintain the collection container with the puncturing system attached in close proximity to the shop operation(s) that are most likely to generate waste aerosol cans.**
- Ensure all HW collection drums are kept closed and sealed (ring and bolt tightened), except when adding waste.
- Open top of puncturing device slowly, keeping your head/face away from the openings.
- Feed aerosol cans into can puncturing system one at a time.

To complete the puncturing process;

1. Remove the cap and nozzle from the aerosol can
2. Insert can into puncturing device top (nozzle end) down
3. Lower the cover snugly over the can and tighten lock knob against the can
4. Push handle down firmly and wait at least 20 seconds for can to drain
5. Raise the cover plate and remove punctured can
6. **All HW drums must be kept closed and sealed (except when adding waste).** When done puncturing aerosol cans, cover of puncturing device must be in the down position to seal the collection drum below.

- Stop filling containers before they are completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum and 2" for a 5-gal pail).
- Maintain the puncturing device as needed. Replace O rings and clean openings as needed to keep the system liquid tight.

#### **Step 5 | Store Full Waste Containers in an Approved Location**

- Once a waste container is full or no more waste will be added, fill-in the ASD and move the container to the HWSB to await pickup for disposal.
  - Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB.
  - See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.
- Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1).
  - Use the ASD as a reference to determine when a pickup of HW is required.
  - **For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.**

#### **Step 6 | Pick-up Procedures**

##### **Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of HW.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).
- See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.

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# ALCOHOLS

(Hazardous Waste)

7

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream can include products that are excess (not completely used-up) during repair of military vehicles or equipment, including:
  - Unused or unserviceable quantities of alcohols or alcohol-containing hazardous products.
    - These products are typically used as fuel additives or in de-icing products (such as concentrated windshield washing solution).
    - Alcohols commonly contained in these products can include: Methanol (or Methyl Alcohol), Ethanol (or Ethyl Alcohol) and Isopropanol (or Isopropyl Alcohol).
- Wear eye, hand, and clothing protection when handling containers of waste alcohol.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste collection containers (pails and drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste alcohols for disposal in their original packaging (cardboard box with separators) whenever possible. Otherwise collect in open top (removable-head) pails or drums.

- Drums can be ordered via NSN (See Table 5-3), pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

Required Container Markings:

Write **HAZARDOUS WASTE** on Container with Permanent Marker (or use Pre-printed Stickers as shown)



Fill in Contents and \*ASD on sticker or write on container

**Waste Alcohol**

\* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).





<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for each waste alcohol product (by NSN and Manufacturer) added to a collection pail/drum, must accompany the container(s) when picked-up by the hazardous waste contractor.</li> <li>• As a P2 measure, make every attempt to use up products containing alcohols and take measures to prevent them from becoming unserviceable.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste alcohol.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail or drum, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste alcohol products to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down). Steel drums must have the lid sealed with the ring and nut/bolt assembly.</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (4' for 55-gallon drum, 3" for a 30-gal drum and 2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste alcohol is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste alcohol as needed.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# ANTIFREEZE, USED

(Recycled Waste)

8

## GENERAL REQUIREMENTS

- This waste stream consists of used Ethylene Glycol-based Antifreeze generated through maintenance operations performed on military vehicles at NYARNG shops.
- Used antifreeze can also contain low concentrations of toxic metals (primarily Cd and Pb) that are harmful to the environment if not recycled or properly disposed of.
- Used antifreeze is regulated in the State of NY as a non-hazardous (recycled) waste when collected and sent to a licensed vendor for recycling.
- Wear eye, hand, and clothing protection when handling Used Antifreeze.
- Other liquids must not be mixed in with used antifreeze. Collect used POLs and other automotive fluids separate from used antifreeze (See **WPS 27**, Oil, Used).

**Note:** Collect Used Antifreeze containing Ethylene Glycol (green solution) separately from Used Antifreeze that contains Propylene Glycol (orange or red solutions). Most antifreeze recycling vendors can accept both types, but to maintain their recycling value the two types must not be mixed.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



Collection containers for Used Antifreeze are typically maintained on the shop floor at NYARNG maintenance shops in areas where these fluids are most likely to be generated.

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Used Antifreeze is typically collected in closed (non-removable) head drums. Containers in the 30 to 55-gallon size range are typically used.

- New (non-removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old POL drums if they can be sealed, are free of oily residue and are not dented, bulging or corroded. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Container with the Following Information as Shown

Required Drum Markings:	(Use Pre-Printed Sticker or Write Directly on Drum with Permanent Marker) <div style="text-align: center; margin-top: 20px;"> </div>	
Fill-in Contents Line on Sticker or Write on Drum:	<p><b>Used Antifreeze</b></p> <p>No Date Required</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• <b>Never Mix Used Antifreeze with Used Oil, collect in separate containers.</b></li> <li>• See precautionary notes above for information on segregation of Used Antifreeze containing Ethylene Glycol (green) from Used Antifreeze containing Propylene Glycol (orange or red).</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>Drum openings (lids and plugs) must be kept closed except when adding Used Antifreeze to the container.</b></li> <li>• Open the drum waste collection drum slowly, keeping your head/face away from the opening.</li> <li>• Remove large bung plug and add Used Antifreeze to the container, use a funnel to avoid spills.</li> <li>• When finished adding waste, remove funnel and tightly re-seal bung plug(s). Keep drum sealed (except when adding Used Antifreeze).</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4-in. for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Drums in an Approved Location</b>
<ul style="list-style-type: none"> <li>• No Accumulation Start Date (ASD) is required.</li> <li>• When full, move drums of Used Antifreeze to a HWSB or another suitable and secure waste drum storage location until pickup by the recycling vendor.</li> <li>• As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Recycled Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups of full containers of Used Antifreeze.</li> <li>• Schedule Used Antifreeze pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste recycling vendor(s) that have been pre-approved to pick-up Used Antifreeze.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for recycled waste.</li> </ul>	

# ASBESTOS CONTAINING MATERIALS

## (Non-Hazardous Waste)

### GENERAL REQUIREMENTS

- Asbestos is a naturally occurring mineral and a known carcinogen; breaking or fracturing of suspected Asbestos Containing Materials (ACMs) during handling can release microscopic asbestos fibers that create an airborne breathing hazard.
- NYARNNG maintenance shops that perform brake/clutch replacement or repair operations could generate older era waste brake shoes or clutch friction plates that could have > 1% asbestos content and be classified as Asbestos Containing Materials (ACMs). In addition, old firefighting suits and fire blankets could also be classified as ACMs.
- Handle brake shoes/clutch plates that are suspected ACMs with caution and dispose of as ACMs.
- Wear eye, hand and clothing protection when handling wastes that are suspected ACMs. Avoid exposure to dust from waste ACMs whenever possible.

**Note:** Many NYARNNG facilities could still have ACM building components. These materials typically consist of old floor tiles or pipe wrappings related to facility heating and cooling. These types of ACMs should be left undisturbed whenever possible. When damage or deterioration of suspected ACM building materials are discovered, **contact the FMO IMMEDIATELY**. Removal and disposal of ACM building materials is to be performed only by licensed and certified abatement contractors.

- ACM disposal is regulated under the federal Toxic Substance Control Act (TSCA) and must be disposed of in landfills specially licensed to accept this material under State of NY waste regulations.
- The POC for this guidance is the NYARNNG HWM and can be reached at (518) 786-4347.


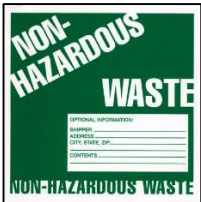


### Step 1 | Select an Approved Container

In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNNG maintenance shops.

**Approved Containers:** ACMs are typically collected in removable-head steel drums. Brake shoes or other ACMs must be first be double bagged in 6-mil plastic bags before being placed into the collection drum.

- 6-mil plastic bags (see below) can be ordered by NSN.
- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 | Mark Containers with the Following Information

<p>Required Drum Markings:</p>	<p>Write on Drum with Permanent Marker or use Pre-Printed Stickers as shown:</p> <p style="font-weight: bold; font-size: 1.2em;">DANGER</p> <p style="font-weight: bold; font-size: 1.1em;">Contains Asbestos Fibers and Non-Hazardous Waste</p> <div style="display: flex; justify-content: center; align-items: center; gap: 20px;">  <span>and</span>  </div> <p style="font-weight: bold; font-size: 1.1em;">No ASD Required</p>	 
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<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See precautionary notes above regarding the handling of waste materials that are suspected ACMs.</li> <li>• No known recycling options exist for waste ACM. Waste ACMs must be disposed of in landfills specially licensed to accept this material under State of NY waste regulations.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum and bags in close proximity to the area of the shop where waste ACMs are likely to be generated.</li> <li>• Double-bag suspected waste ACMs in 6-mil plastic bags and tape bags shut.</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add bagged brake shoes or other ACMs to the collection container.</li> <li>• If using a drum, replace lid after adding waste. All waste drums must be kept closed (except when adding waste).</li> <li>• Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of waste ACM; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full, move full containers of waste ACM to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the disposal contractor.</li> </ul> </li> <li>• As a BMP, all waste containers in storage (including ACM wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of ACM waste.</li> <li>• Schedule pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up waste ACMs.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.</li> </ul>	

# BATTERIES, LEAD-ACID AUTOMOTIVE (Recycled Waste)

10

## GENERAL REQUIREMENTS

- This waste stream includes spent lead acid automotive batteries that are set aside for recycling.
- Automotive batteries contain toxic lead compounds along with corrosive sulfuric acid.
- Wear eye, hand, and clothing protection when handling automotive batteries.
- At NYARNG maintenance shops, this program is conducted on an exchange basis with a vendor that supplies new automotive batteries to the NYARNG. Contact the NYARNG Surface Maintenance Office for info on the current battery vendor.
- This waste stream is regulated under federal regulation 40 CFR, 261.6 for "Recyclable Material". Spent automotive batteries are sent to a licensed recycling facility that reclaims the batteries IAW federal and state regulations.

Note: Federal and state regulations also allow generators of spent automotive batteries to manage them IAW the Universal Waste rules. These rules are applicable to other types of spent batteries (such as Alkaline, Ni-Cd and Lithium).

- See **WPS 11**; Batteries: Misc, Non-Automotive for procedures to manage waste non-automotive batteries IAW the Universal Waste regulations.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1    Select a Suitable Location



A collection point for spent automotive batteries is maintained at NYARNG maintenance shops in a battery room or other dedicated area. Battery accumulation areas must be cool, dry locations away from heat, flame or combustible materials.

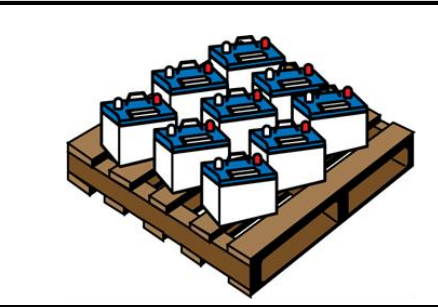
- A supply of an acid-neutralizing chemical such as sodium bicarbonate (baking soda), should be kept in the battery storage room in the event of spills or leakage.

**Approved Containment:** Spent automotive batteries can be collected on a pallet and do not need to be placed in a drum or other container unless they are damaged or leaking. Over-pack leaking batteries in a non-corroding (plastic) pail or tub.

### Step 2    Mark the Collection Area with Following Information as Shown

Required Storage Area Markings:

Automotive Batteries for Recycling



<b>Step 3</b>	<b>Additional Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Place used batteries on pallet in designated storage area with a concrete floor surface. If batteries are to be stacked, a layer of cardboard or plywood must be inserted between the layers to prevent terminal shorting.</li> <li>• If a battery is damaged or leaking, over-pack into a non-corroding (plastic) container while on site awaiting pickup.</li> </ul> <p>Note: Absorbent used to cleanup battery acid spills are to be collected separately and may require disposal as HW as described in WPS A-1, <u>Absorbents, Hazardous</u>.</p>	
<b>Step 4</b>	<b>Pick-up Procedures</b>
<ul style="list-style-type: none"> <li>• Spent automotive batteries are picked up by the same vendor that supplies the shop with new automotive batteries. When calling for service, inform the vendor that you also have spent batteries to exchange during their next delivery.</li> <li>• Vendors will also typically accept damaged or leaking batteries for recycling, provided they are over-packed in a non-corrosive (plastic) container.</li> <li>• Recordkeeping requirements include tracking the total number and weight of automotive batteries turned in for recycling each year. This information is used by the Environmental Office to complete annual reports on recycling activities to the NGB and DA levels.</li> </ul>	

# BATTERIES: MISC, NON-AUTOMOTIVE (Universal Waste)

11

## GENERAL REQUIREMENTS

- This waste stream includes certain waste batteries generated by NYARNG activities, consisting of the following battery types;
  - Spent single-use and rechargeable (radio and equipment) batteries must be accumulated for recycling or disposal under state and federal Universal Waste regulations.
  - These battery types include: Alkaline, Lithium, Nickel-Cadmium (NI-CD), Nickel-Metal Hydride, Mercury and Magnesium (See Battery Information Table included in this WPS).
- See **WPS 10; Batteries, Automotive** for information on recycling lead/acid automotive batteries.
- Wear skin, eye and clothing protection when handling waste batteries.

**Caution:** Batteries may contain corrosive chemicals. Battery vapors can be flammable, corrosive and/or toxic and create breathing hazards.

**Note:** DO NOT activate the discharge device (button) to de-mil military lithium batteries outside of a controlled battery processing or storage area.

- The POC for this guidance is the NYARNG HWM at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of containers (pails) for the collection of waste batteries are to be maintained as needed at all NYARNG facilities.

**Check:** To see if a container has already been established for the waste battery type. If not, select/establish a new accumulation container.

**Approved Container:** Collect the various types of Universal Waste batteries in rigid plastic pails 1 to 5 gallons in size that can be sealed tightly.

- Containers that meet these requirements and can be obtained from the waste disposal vendor or purchased locally.
- Reuse old product pails only if they meet the requirements stated above. Remove or paint over labels & markings for the previous product.

### Step 2 Mark the Container with the Following Information as Shown




Use Pre-printed Sticker as shown, (or write on with permanent marker)	<b>Universal Waste</b>	
Write on Contents Line (or on container) including the battery type:	<b>Used Batteries</b>	
Write on Accumulation Start Date (ASD) line (or on container):	<b>Date first battery placed into container.</b>	
Maximum Hold Time:	<b>1 Year</b>	









<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Create a separate collection container for <b>each Universal Waste battery type</b> (See Battery Information Table for assistance in identifying battery types).</li> <li>• <b>Before placing in collection containers, individual batteries shall have exposed terminals covered with non-conductive (electrical) tape or be placed in separate baggies, to prevent fires from short circuits during storage.</b></li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Accumulate waste batteries in a dedicated battery storage room or in another cool, dry, well-ventilated location away from ignition sources and day-to-day shop activities.</li> <li>• Open containers slowly, keeping your head/face clear of the opening.</li> <li>• Add waste batteries and close the container (Keep lids on collection pails closed/sealed except when adding batteries).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Move full containers of UW batteries to a HWSB or another secure waste storage location. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full UW containers in storage awaiting pickup.</li> <li>○ Full containers will remain in storage until pickup by the battery recycling vendor.</li> </ul> </li> <li>• All full containers of UW batteries in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of UW Batteries.</li> <li>• Schedule pickup of full containers of UW Batteries as needed, keeping in mind maximum container hold times and aisle space requirements (3' minimum) in the HWSB. <ul style="list-style-type: none"> <li>○ <b>Remember:</b> The maximum hold time for a container of UW batteries is 1-year from the ASD. A pickup must be scheduled before the 1-year hold time is exceeded.</li> </ul> </li> <li>• Check the current Blanket Purchase Agreements to identify a waste contractor to perform the Universal Waste Battery pickup.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of universal waste.</li> </ul>	

### BATTERY INFORMATION TABLE

Battery types included in this WPS include, but are not limited to, the following:

Battery Type	Image	Recommended Container	Special Precautions
Alkaline		1 to 5-gallon plastic pail	Place electrical tape over terminals.
Sealed Lead-acid <sup>(1, 2)</sup> (Jell Cell Emergency Lighting)		5-gallon plastic pail	Place electrical tape over terminals.
Lithium Sulfur Dioxide <sup>(2)</sup> Rechargeable		5-gallon plastic pail	<p><b>Do not discharge outside shop battery room.</b></p> <p>Place electrical tape over terminals.</p>

<p>Lithium Sulfur Dioxide<sup>(2)</sup> (Non-rechargeable)</p>		<p>1 to 5-gallon plastic pail</p>	<p><b>Do not discharge outside shop battery room.</b></p> <p>Place electrical tape over terminals or package individually in plastic baggies.</p>
<p>Misc. Lithium (small)</p>		<p>1-gallon plastic pail</p>	<p>Place electrical tape over terminals or package individually in plastic baggies.</p>
<p>Magnesium</p>		<p>5-gallon plastic pail</p>	<p>Not applicable</p>

<p>Nickel-Cadmium (wet) Aviation</p>		<p>5-gallon plastic pail</p>	<p>Place electrical tape over terminals.</p>
<p>Nickel-Cadmium (dry)</p>		<p>1 to 5-gallon plastic pail</p>	<p>Place electrical tape over terminals.</p>
<p>Nickel-Metal Hydride Rechargeable</p>		<p>1 to 5-gallon plastic pail</p>	<p>Place electrical tape over terminals.</p>

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# Blasting Sand and Beads, Used

(Hazardous Waste)

12

## GENERAL REQUIREMENTS

This waste stream includes abrasive media used to strip paint, including the following:

- Blasting sand (typically consisting primarily of Aluminum Oxide).
- Glass beads (typically consisting of primarily Silicone Oxides).
- Other used abrasive media used to remove paint or other finishes. Can include many types of media available today commercially, such as metal shot, baking soda and walnut shells
- Wear eye, hand, and clothing protection when handling used blasting media.
- Blasting media becomes contaminated during normal use with paint chips and dust that can contain the toxic metals (cadmium, chromium, and lead).
- Contaminants in blasting media can vary depending upon the age and makeup of the paint coating(s) being removed, as well as the duration and frequency of media usage.
- When changed out of a blasting unit (glove box), the old blasting sand/beads must be tested to determine if it is hazardous waste due to environmental toxicity.
- If laboratory testing determines that the used blast media is non-hazardous waste, it can be disposed of as in a dumpster as General Refuse.
- If laboratory testing determines that the used blast media is hazardous waste, see Step 2 below for instructions on HW container management requirements.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.

**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Blast Media in open top (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with the Following Information as Shown

Required Drum Markings:

(Use Pre-Printed Sticker or Write "Hazardous Waste" on Drum with Permanent Marker)



Fill-in Contents Line and \*ASD on Sticker or Write on Drum:

**Used Blasting Sand/Beads**

\* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• As a P2 option, submit the material for testing regularly over the usage cycle of the material. Media can be disposed of as Non-Hazardous Waste if it is changed-out before it tests over the threshold for RCRA metals (such as Cd, Cr and Pb).</li> <li>• No known recycling options exist for this waste material.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All HW containers must be kept closed and sealed (ring and bolt tightened), except when adding waste.</b></li> <li>• Open waste collection drums slowly, keeping your head/face away from the opening.</li> <li>• Add HW blasting media to the collection drum.</li> <li>• Replace lid and seal top ring with nut/bolt. HW containers must be closed/sealed except when adding waste.</li> </ul>	
<p><b>Caution: Stop filling drums when they are no more than ¾ full. A full 55-gallon drum of used blast media can weigh over 500 Lbs.</b></p>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added). <ul style="list-style-type: none"> <li>○ See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.</li> </ul> </li> <li>• If waste is accumulated (added to a drum) in a HWSB, fill-in the ASD when waste is first put into the drum. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a pickup of HW is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of Hazardous Blast Media, Used.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# BRAKE FLUID, SYNTHETIC (RECYCLED WASTE)

13


## GENERAL REQUIREMENTS SUMMARY

- This waste stream includes used Synthetic (Silicone) Brake Fluid generated through brake maintenance operations performed on military vehicles at NYARNG shops.
- This waste stream also includes quantities of unused Silicone Brake Fluid that become unserviceable due to improper storage or shelf-life expiration.

**Note:** Silicone Brake Fluid is called out (**See WPS 29, Oil, Used**) as a liquid HC products that **must not** be mixed in with used oil.



- This material meets the definition of non-hazardous (recycled) waste.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 | Select an Approved Container

 Collection containers for used Silicone Brake Fluid are typically maintained on the shop floor at NYARNG maintenance shops. **Drum lids and plugs must be closed except when adding brake fluid.** The exception is for drums outfitted with a threaded funnel that has a closable, locking lid.

**Approved Containers:** Used Silicone Brake Fluid can be collected in non-removable head steel drums. Use empty (non-removable head) containers in 30 and 55-gallon sizes. Used (non-removable head) drums that contained POLs can be re-used if they can be sealed and are free of dents, bulging or corrosion. Remove or paint over old labels & markings from the previous product.

### Step 2 | Mark the Container with Following Information as Shown

Required Drum Markings:	<p>Use Pre-Printed Sticker (as shown) or Write on Drum with Permanent Marker.</p> 	
Write on Contents Line:	<p><b>Used Silicone Brake Fluid</b></p>	

### Step 3 | Quality Control (General Do and Don'ts)

- See precautionary note above, used Silicone Brake Fluid (either used or unserviceable) **must not** be mixed with Used Oil.
- Used Oil is managed as a separate waste stream as described elsewhere in this plan (**See WPS A-26: Oil, Used**)



**Step 4 Waste Accumulation Information**

- Wear eye, hand, and clothing protection when handling used Silicone Brake Fluid.
- Open the drum slowly, keeping your head/face away from the opening.
- Add used Silicone Brake Fluid to the container using a funnel.
- Remove funnel, replace plug and keep drum closed (except when adding used Brake Fluid).
- Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum).

**Step 5 Store Full Waste Drums in an Approved Location**

- No Accumulation Start Date (ASD) is required
- When full, move drums of used Silicone Brake Fluid to a HWSB or another suitable and secure waste drum storage location until pickup by the recycling vendor.
- All waste drums in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).

**Step 6 Pick-up Procedures****Recycled Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pickups for full drums of used Silicone Brake Fluid.
- Schedule pickup of full drums of used Silicone Brake Fluid as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.
- Check the current list of Environmental Waste Contractors to identify the waste recycling vendor(s) that have been pre-approved to pick-up Synthetic Brake Fluid.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Hazardous Materials Bill-of-Lading).
- See Chapter 8 for details on documentation and recordkeeping requirements for recycled waste.

# Brake Washing Solutions and Filters

(Hazardous Waste)

14

## GENERAL REQUIREMENTS

- This waste stream includes used cleaning solutions and used filters from wet-method Brake Washing equipment, consisting of the following:
  - Washing solutions inside the brake washing machine typically consist of flammable solvent and must be disposed of as Ignitable HW when they are changed out.
  - Washing solutions will stay good for an extended period of time if filters are changed regularly.
- Used filters and solutions from these systems are to be submitted for laboratory testing to determine if they must be disposed of as hazardous waste. See instructions in Step 2 for Container and Marking Requirements.
- Wear eye, hand, and clothing protection when handling waste brake washing solutions or performing filter changes.

**Note:** Used filters may also be hazardous waste

- Waste filters may require additional evaluation (including possible sampling and analysis by the HW vendor), to determine if they meet the HW definition for toxicity.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container

In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.





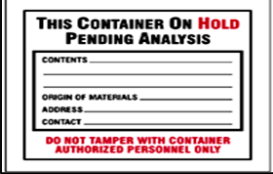


**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Brake Washing Solutions in closed top (non-removable-head) steel drums. Use removable-head plastic pails to contain HW filters.

- New (non-removable head) drums can be ordered by NSN (See Table 5-3).
- Purchase pails locally or obtain from the hazardous waste vendor.
- Re-use old (non-removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with the Following Information as Shown

<p>Required Container Markings:</p>	<p>(Use Pre-Printed Sticker or Write “<b>Hazardous Waste</b>” on Drum with Permanent Marker)</p> 	
<p>Fill-in Contents Line and *ASD on Sticker or Write on Drum/Pail:</p>	<p><b>Used Brake Washing Solution</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<p>Required Pail Markings:</p>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>While Analysis in Process</p> </div> <div style="text-align: center;">  <p>If found to be HW</p> </div> </div>	
<p>Fill-in Contents Line and *ASD on Sticker or Write on Pail:</p>	<p><b>Used Brake Washing Filters</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	
<p><b>Step 3 Waste Accumulation Information</b></p>		
<ul style="list-style-type: none"> <li>• <b>All HW containers must be kept closed (drum plugs sealed, pail lids snapped shut), except when adding waste.</b></li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add HW solutions/filters to the appropriate collection container. For liquids, use funnel to avoid spills.</li> <li>• Remove funnel, replace and seal plugs. Funnels can stay in place if they have close-able lids.</li> <li>• Stop filling container before it is completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum and 2' for a 5-gal pail).</li> </ul>		
<p><b>Step 4 Store Full Waste Containers in an Approved Location</b></p>		
<ul style="list-style-type: none"> <li>• If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added). <ul style="list-style-type: none"> <li>○ See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.</li> </ul> </li> <li>• For HW accumulated (added to a drum) in a HWSB, the ASD must be filled-in when waste is first put into the drum. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a pickup of HW is required.</li> </ul> </li> <li>• <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul>		
<p><b>Step 5 Pick-up Procedures</b></p>		

**Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of Hazardous Brake Washing Solutions and/or used filters.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).
- See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.

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# CLEANER, LUBRICANT & PRESERVATIVE (CLP) (Hazardous & Non-Hazardous Wastes)

15

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream include HC product(s) that are commonly used to clean or maintain weapons used during training exercises:
- Unused (excess) CLPs can include
  - Unused quantities of chlorinated CLP (Manufacture Date 1994 or earlier) consisting of excess or unserviceable HC product(s).
  - Unused quantities of non-chlorinated CLP (Manufacture date 1995) or after consisting of excess or unserviceable HC product(s).

**Note:** Chlorinated CLPs (manufactured pre-1995) contain 10% or more Trichloroethylene. Because of this ingredient, unused or excess CLPs of this vintage must be disposed of as Hazardous Waste.

- Wear eye, hand, and clothing protection when handling containers of waste adhesive.
- Common materials (patches, swabs/pipe cleaners) that become contaminated with CLP during weapons cleaning operations are to be disposed of **IAW WPS 41, Weapons Cleaning Rags and Patches, Used.**
- When setting aside for disposal, segregate containers of waste chlorinated (pre-1995) CLP (Hazardous) from waste non-chlorinated (Non-Hazardous) CLP, (See Step 2).
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 Select an Approved Container



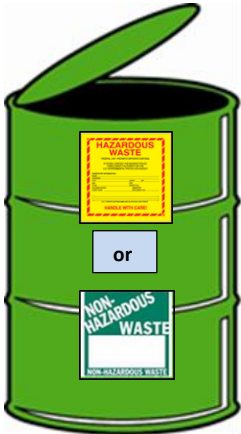


In general, supplies of waste collection containers (drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste CLP for disposal in separate open top (removable-head) steel drums. Use separate containers (drums) for hazardous (chlorinated) and non-hazardous (non-chlorinated) CLPs.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

## Step 2 Mark the Container with Following Information as Shown

<p>Required Drum Markings:</p>	<p><b>Write HAZARDOUS or NON-HAZARDOUS WASTE on Drum with Permanent Marker (or use Pre-printed Stickers)</b></p> <div style="display: flex; justify-content: center; align-items: center; gap: 20px;">  <span>or</span>  </div>	
<p>Fill in Contents and *ASD on sticker or write on drum</p>	<p><b>Waste CLP</b></p> <p>* For HW CLPs, See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• As a P2 measure, query Bde or Bn levels to determine if there are NYARNG units in need of this material that can use it up instead of having it picked up as waste.</li> <li>• See General Requirements section above for information on the different disposal requirements for chlorinated CLP vs. non-chlorinated CLPs.</li> <li>• A copy of the SDS for each waste CLP (by NSN and Manufacturer) added to a collection drum, must accompany the container(s) when picked-up by the waste contractor.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste CLP.</b></li> <li>• Open the drum slowly, keeping your head/face away from the opening.</li> <li>• Add containers of waste CLP to the collection drum.</li> <li>• Replace lid and re-seal top ring with nut/bolt.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a drum of waste CLP is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ For HW CLP, fill-in the ASD. Write the ASD on the pre-printed waste sticker (or directly on the drum) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of both hazardous and non-hazardous waste CLP.</li> <li>• Pickups of HW CLP will be scheduled so the 180-day maximum hold time for a full container is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous and/or Non-Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous and non-hazardous wastes.</li> </ul>	

# DECON CHEMICALS (DS-2, STB) (Hazardous Waste)

16

## GENERAL REQUIREMENTS

- This waste includes **Decontamination (Decon) Solutions** intended for use on military vehicles and equipment following battlefield exposure to Nuclear, Biological and Chemical (NBC) agents.
- These types of HC products often are not used as intended, are left on the shelf and become unserviceable due to container deterioration and expired shelf life. Once they are determined to be excess or unserviceable, these materials must be turned-in for proper disposal as HW.
- Even though they are used for similar purposes, DS2 and STB are not chemically compatible with each other. If a unit identifies quantities of both of these products as excess or unserviceable at the same time, they must be packaged for transport and disposal in separate containers (drums).

**Note:** DS2 is classified by the US DOT as a Corrosive Liquid while STB is classified by the US DOT as an Oxidizer. These two products must be stored separately from each other at all times during their life cycle (including disposal).

- Partially full containers of unused DS2 or STB can also be turned in for proper disposal. Containers that have been opened or are leaking must be over-packed in a removable-head container as shown below in Step 2.
- Wear eye, hand, and clothing protection when handling containers of waste Decon chemicals.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container







In general, supplies of waste collection containers (pails and drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste Decon chemicals for disposal in their original packaging whenever possible (See below). Otherwise collect in open top (removable-head) pails or drums.

- Drums can be ordered via NSN (See Table 5-3), pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

<p>Required Drum Markings:</p>	<p style="text-align: center;"><b>Write HAZARDOUS WASTE on Container with Permanent Marker (or use Pre-printed Stickers as shown)</b></p> <div style="text-align: center;">  </div>	<div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>DS2 Containers (typical)</p> </div> <div style="text-align: center;">  <p>STB Container (typical)</p> </div> </div>
<p>Fill in Contents and *ASD on sticker or write on container</p>	<p style="text-align: center;"><b>Waste Decon Chemicals</b></p> <p style="text-align: center;">* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	<div style="text-align: center;">  </div>



<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for each waste Decon chemical product (by NSN and Manufacturer) added to a collection pail/drum, must accompany the container(s) when picked-up by the hazardous waste contractor.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste Decon chemicals.</b></li> <li>• If utilizing original packaging (as shown in Step 2), make sure containers will remain sealed while in storage awaiting pickup. Otherwise over-pack in drum or pail.</li> <li>• When collecting in a pail or drum, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste Decon chemicals to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down). Steel drums must have the lid sealed with the ring and nut/bolt assembly.</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (4' for 55-gallon drum, 3" for a 30-gal drum and 2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste Decon chemicals is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (<i>See Attachment 8-1</i>). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste Decon chemicals as needed.</li> <li>• Pickups of HW Decon chemicals will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# ELECTRONIC SCRAP (E-SCRAP)

## (Recycled Waste)

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### GENERAL REQUIREMENTS

- Surplus obsolete electronic items contain toxic metal compounds (such as Cadmium, Lead and Mercury) that can cause pollution when they not properly disposed of.
- Wear eye, hand, and clothing protection when handling E-scrap.
- This waste stream is generated by nearly all NYARNG facilities and activities. It typically includes;
  - Federally recoverable electronic items and devices such as computers, monitors; Cathode Ray Tubes (CRT) or flat screen, and ancillary equipment such as printers, keyboards, mouse and charging cords. These items are turned in to the USPFO as surplus federal property when to be disposed of.
  - Unserviceable non-federal issued electronic items and devices generated during maintenance on military vehicles and equipment such as circuit boards, and digital display systems. These items must be segregated and contained for recycling on site as per Step 2.
- This waste stream is regulated under federal solid waste regulations. Unserviceable electronic items are reprocessed or recycled IAW federal regulations.
- In general, E-scrap items are exempted from HW determination requirements under federal and state when recycled.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** E-Scrap is collected in open top (removable-head) steel drums or plastic pails.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Containers with the Following Information as Shown

Required Drum Markings:	(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> ™ on Drum with Permanent Marker)	
Fill-in Contents Line on Sticker or Write on Drum:	<b>E-Scrap</b>  No Date is Required.	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See WPS 37, <u>PCB Containing Electronic Devices</u> for information on recycling or disposal of electronic devices (such as capacitors, transformers and ballasts) that still contain di-electric fluids (oils) that contain PCBs.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum in close proximity to the area of the shop where E-Scrap is most likely to be generated (such as an electronics shop).</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add E-Scrap to the collection container.</li> <li>• Replace the lid after adding waste. All waste containers must be kept closed (except when adding waste).</li> <li>• Stop filling drums/pails before they are completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum and 2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of E-Scrap for recycling; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full, move full containers to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain in secure storage until they are turned-in.</li> </ul> </li> <li>• All waste containers in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Turn-in Procedures</b>
<p><b>Turn-in Procedures for E-Scrap Vary; Is the Item Federal or State Property?</b></p> <p><b>Federal Property:</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for obtaining approvals and scheduling turn-ins for federal E-Scrap items. <ul style="list-style-type: none"> <li>○ Federal E-scrap items are subject to Technical Inspection (TI) requirements to determine the proper disposition.</li> <li>○ Contact CIO/G6 to obtain TI clearance so the item can be removed from the Property Book.</li> <li>○ If determined to be recoverable, transport the E-scrap to the USPFO for processing to the DRMO. All sales/disposal of E-scrap will be performed by the DRMO.</li> <li>○ E-scrap can be transported on Government Owned Vehicles and require no shipping papers.</li> </ul> </li> </ul> <p><b>State Property:</b></p> <ul style="list-style-type: none"> <li>• Property custodian makes the following contacts; <ul style="list-style-type: none"> <li>○ State Property Manager at 518-786-4961, to transfer item(s) to state master property book.</li> <li>○ Help Desk at HQ (MNAS) in Latham at 518-786-4547, to coordinate the turn-in. <ul style="list-style-type: none"> <li>➢ E-scrap can be transported on Government Owned Vehicles and require no shipping papers.</li> <li>➢ MNAS will scrub information from hard drives and assess the item for potential re-use. Items determined to be suitable will be re-issued or turned-in to the NY Office of General Services as surplus property.</li> <li>➢ Electronic items that are not re-issued to other agencies will be put up for sale to the general public as surplus state property.</li> <li>➢ Electronic items that do not sell will be documented as unserviceable and recycled or disposed of through a commercial vendor licensed to accept this E-scrap waste.</li> </ul> </li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of recycled waste, including E-scrap.</li> </ul>	

# ETHER, COMPRESSED GAS and AEROSOL (HAZARDOUS WASTE)

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## GENERAL REQUIREMENTS

- This waste stream consists of excess or unserviceable gas cylinders or aerosol cans that contain Ether (or Diethyl ether), a flammable gas typically used in as automotive starting fluid during cold weather months.
- Caution: Ether is and extremely flammable gas that is regulated for disposal under state and federal solid waste regulations. This chemical can cause pollution when not properly disposed of.
- Wear eye, hand and clothing protection when handling pressurized gas cylinders or aerosols.
- If the container (cylinder or aerosol can) is excess or becomes unserviceable, it must be turned-in to a HW vendor for disposal.

**Note:** A main area of concern with regard to disposal of pressurized cylinders is how they are stored on site while being accumulated for turn-in. See Step 2 below for instructions on how to properly store these items while being accumulated on site awaiting pickup.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container






Establish a collection point in a dedicated area for waste pressurized cylinders that contain a flammable gas. Waste accumulation areas must be dry locations. If being picked up by a HW vendor, cylinders are typically stored in the same room/shed as the other waste containers generated on site.

**Note:** Flammable gasses must be stored at least 50-feet away other non-flammable gasses or gasses that support combustion (Oxygen). All pressurized cylinders must be immobilized in their upright position while in storage awaiting turn-in.

**Approved Containers:** Outside packaging required for turn-in and transport of pressurized cylinders typically consists of the original outer packaging (cardboard box with separators) whenever possible. Smaller cylinders are packaged for transport in wooden crates or drums supplied by the waste vendor.

### Step 2 Mark the Cylinder(s) with Following Information as Shown

<p>Required Package Markings:</p>	<p style="text-align: center;"><b>Write Hazardous Waste on Cylinder with Permanent Marker (or use Pre-printed Sticker)</b></p> <div style="text-align: center;">  </div>	<div style="display: flex; justify-content: space-around;">   </div>
<p>Wright-in Accumulation Start Date (ASD);</p>	<p style="text-align: center;"><b>Ether, Excess or Unserviceable</b></p> <p style="text-align: center;"><b>ASD = Same day the sticker is applied to cylinder</b></p>	<p style="text-align: center;"><b>Use a separate HW sticker on each waste cylinder</b></p>

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• As a P2 measure, query other shops or at the unit's Bde or Bn levels to determine if there are NYARNG activities in need of this material that can use it up instead of having it picked up as waste.</li> </ul> <p><b>Caution, Do Not:</b></p> <ul style="list-style-type: none"> <li>○ Use a compressed gas cylinder as a roller or support.</li> <li>○ Accept, issue or use a cylinder if the contents are unknown.</li> <li>○ Allow open flames within 50-feet of a flammable compressed gas cylinder.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• This waste stream consists of unused or unserviceable product and is not typically accumulated for disposal in small batches.</li> <li>• While stored at a NYARNG facility, waste compressed gas cylinders or aerosol cans containing ether must be stored in an indoor or covered (dry) location that will prevent contact with storm water.</li> </ul>	
<b>Step 5</b>	<b>Store Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Once it is determined that the flammable gas is to be disposed of, the waste (cylinder(s) and/or aerosol cans) must be moved to a HWSB (or another suitable waste storage location) until they are picked up for disposal. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of hazardous waste ether.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# FILTERS, FUEL (JP8 & Mogas)

(Hazardous Waste)

## GENERAL REQUIREMENTS

- This waste stream includes used fuel filters that are contaminated with flammable fuels such as JP8 and Mogas), that are generated through vehicle and aircraft maintenance operations.

Wear eye, hand, and clothing protection when handling HW fuel filters.

**Note:** Oil and diesel fuel filters can be disposed of as Non-Hazardous Waste (See **WPS 20, Filters, Oil and Diesel Fuel**).

- This waste stream may require additional evaluation by the waste disposal vendor (including possible sampling and analysis), to determine if it meets the HW definition.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container

In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.





**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Fuel Filters in open top (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with the Following Information as Shown

<p>Required Drum Markings:</p>	<p>(Use Pre-Printed Sticker or Write “<b>Hazardous Waste</b>” on Drum with Permanent Marker)</p> 	
<p>Fill-in Contents Line and *ASD on Sticker or Write on Drum:</p>	<p><b>Used Fuel Filters (JP8)</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See note in Step 1 above for information on separation of non-hazardous oil and diesel fuel filters, (as described in WPS 20) from hazardous waste fuel filters as described in this WPS.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All HW containers must be kept closed and sealed (ring and bolt tightened), except when adding waste.</b></li> <li>• Open waste collection drums slowly, keeping your head/face away from the opening.</li> <li>• Add HW fuel filters to the collection drum.</li> <li>• Replace lid and seal top ring with nut/bolt. HW containers must be closed/sealed except when adding waste.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added). <ul style="list-style-type: none"> <li>○ See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.</li> </ul> </li> <li>• If waste is accumulated (added to a drum) in a HWSB, fill-in the ASD when waste is first put into the drum. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a pickup of HW is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of Hazardous Waste fuel filters.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# FILTERS, OIL and DIESEL FUEL

(Non-Hazardous Waste)

## GENERAL REQUIREMENTS

- This waste stream includes used oil filters and fuel filters contaminated with diesel fuel, generated through vehicle maintenance operations.
- Wear eye, hand, and clothing protection when handling used oil or diesel fuel filters.

Note: Used fuel filters used for JP8 or Mogas must be collected for disposal separately from oil filters (See **WPS 19; Filters, Fuel**). Fuel filters are disposed of as HW.

- Used oil filters are exempted from HW analysis requirements under federal and state when recycled.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 | Select an Approved Container





In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Used oil filters are collected in open top (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 | Mark Containers with the Following Information as Shown

Required Drum Markings:	(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> ” on Drum with Permanent Marker)  	
Fill-in Contents Line on Sticker or Write on Drum:	<b>Used Filters (POL and Diesel Fuel)</b>  No Date is Required.	



<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See precautionary notes above; fuel filters used for JP8 or Mogas must be collected for disposal separately (<b>See WPS 19; Filters, Fuel</b>) from Oil and Diesel Fuel Filters as described in this WPS.</li> <li>• Used filters should be crushed or drained for 24-hours at room temperature before being added to a collection drum.</li> <li>• Oil drained from oil filters is to be recycled as used oil (<b>See WPS 29; Oil, Used</b>)</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum in close proximity to the area of the shop where used oil filters or diesel fuel filters are likely to be generated.</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add crushed/drained filters to the collection container.</li> <li>• Replace the lid after adding waste. All waste drums must be kept closed (except when adding waste).</li> <li>• Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of non-hazardous used oil filters and/or diesel fuel filters; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full, move full containers to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the recycling contractor.</li> </ul> </li> <li>• All waste containers in storage are to be checked weekly as part of the routine inspection of the HWSB (<b>See Attachment 8-1</b>).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of used oil and diesel fuel filters.</li> <li>• Schedule Non-Hazardous Waste pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Non-Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.</li> </ul>	

# Fuel, Contaminated or Unserviceable (Hazardous Waste)

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## GENERAL REQUIREMENTS

This waste stream includes off-specification (unserviceable) flammable liquid fuels consisting of the following:

- Diesel Fuel, can be flammable, depending upon actual flashpoint (Flammable if  $FP \leq 140^{\circ}F$ ).
  - JP-8, flammable liquid that can also contain toxic and volatile compounds (such as Benzene).
  - Mogas (or Gasoline), flammable liquid that contains volatile compounds (such as Benzene).
- Wear eye, hand, and clothing protection when handling HW fuel(s).

**Note:** Used absorbents that are contaminated with fuel must be collected and disposed-of as Hazardous Waste (See WPS 1; Absorbents, Hazardous). Collect fuel-contaminated absorbents in a separate collection drum from absorbents used to cleanup spills of non-flammable POL products.

- Segregate waste fuels by type. Establish separate collection containers for waste diesel fuel, JP-8 and Mogas.
- This waste stream may require additional evaluation by the HWM (including possible sampling and analysis), to determine if it meets the HW definition.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.

**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Fuels in closed top (non-removable head) steel drums.

- New (non-removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (non-removable head) POL containers if the plugs can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with the Following Information as Shown

Required Drum Markings:

(Use Pre-Printed Sticker or Write "Hazardous Waste" on Drum with Permanent Marker)



Fill-in Contents Line and \*ASD on Sticker or Write on Drum:

**Fuel, Off-Specification (Diesel, JP8 or Mogas)**

See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• As a P2 option, non-volatile waste fuels such as diesel fuel and JP8 can be recycled by running them through a filter/separator device to remove particulates and water. Fuels reconditioned in this manner can be used for their original purpose.</li> <li>• Collection drums used to store flammable waste fuels must be grounded while in accumulation or storage mode.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All HW containers must be kept closed and sealed (bung plugs tightly sealed), except when adding waste.</b> This includes removal of funnels, unless the funnel has a closable lid.</li> <li>• Open waste collection drums slowly, keeping your head/face away from the opening.</li> <li>• Remove large bung plug and add HW fuel to the collection drum, use a funnel to avoid spills.</li> <li>• When finished adding waste, close funnel lid or remove funnel and tightly re-seal bung plug(s).</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added). <ul style="list-style-type: none"> <li>○ See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.</li> </ul> </li> <li>• If waste is accumulated (added to a drum) in a HWSB, fill-in the ASD when waste is first put into the drum. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a pickup of HW is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full drums of HW fuel.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

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# FIRE EXTINGUISHERS

## (RECYCLED COMPRESSED GAS CYLINDERS)

### GENERAL REQUIREMENTS

- This waste stream includes excess or unserviceable federally issued Fire Extinguishers that are typically generated when maintenance is performed on military equipment that have built-in fire suppression systems.
- In general, fire extinguishers consist of compressed gas cylinders that contain and dispense fire suppression and extinguishing chemicals such as Carbon Dioxide, Halon or misc dry powders). These chemicals can cause pollution when not properly disposed of.
- Halons belong to a family of chlorinated gases that are classified as Ozone Depleting Chemicals (ODCs). Release of Halon gas for the purpose of disposal is forbidden by federal regulation.
- Wear eye, hand and clothing protection when handling fire extinguishers.
- Fire extinguishers are processed as a recyclable waste whenever possible. Once used, empty extinguishers are set aside for refill/recharge through a fire equipment vendor (See Step 3 for additional information).

**Note:** A main area of concern with regard to disposal of pressurized cylinders is how they are stored on site while being accumulated for turn-in. See Step 2 below for instructions on how to properly store these items while being accumulated on site awaiting pickup.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 | Select an Approved Container



Establish a collection point in a dedicated area for fire extinguishers designated for turn-in or disposal. Waste accumulation areas must be dry locations. Excess or unserviceable fire extinguishers are typically stored in the same room/shed with the other waste containers generated on site.

**Note:** Flammable gasses must be stored at least 50-feet away other non-flammable gasses or gasses that support combustion (Oxygen). All pressurized cylinders must be chained to a wall in their upright position with screw-on cap(s) in place while in storage awaiting turn-in.

**Approved Containers:** Outside packaging required for turn-in and transport of pressurized cylinders typically consists of a metal (screw-on) valve protection cover. Smaller cylinders are typically packaged for transport in fiberboard boxes or wooden crates supplied by the fire equipment vendor.

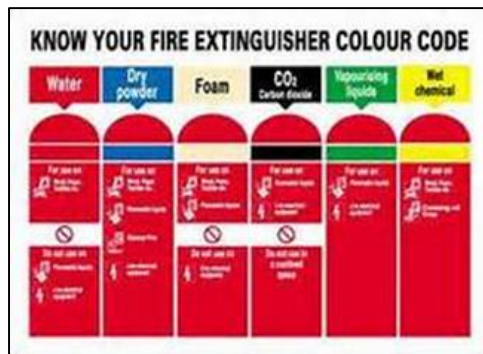
### Step 2 | Mark the Cylinder(s) with Following Information

Required Package Markings:

**Maintain Original Package Markings/Labels**

**If Excess or Unserviceable Designate for Turn-in or Disposal**

**NO ASD Required**



<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Used (empty) extinguishers (that have expelled their contents through normal use), are to be refilled/recharged through a fire equipment supply vendor.</li> <li>• Excess or Unserviceable extinguishers, are to be designated for de-mil at the supporting maintenance shop. <ul style="list-style-type: none"> <li>○ The de-mil process involves discharge of the cylinder, removal of valves and cutting the cylinder in half to be recycled as scrap metal.</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• This waste stream consists of unused product and associated empty containers, and is not typically accumulated for disposal in small batches.</li> <li>• While being accumulated at a NYARNG facility, waste fire extinguishers must be stored in an indoor or covered (dry) location that will prevent contact with storm water.</li> </ul>	
<b>Step 5</b>	<b>Store Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Once it is determined that a fire extinguisher is to be disposed of, it can be moved to a HWSB (or another suitable waste storage location) until turned-in.</li> <li>• As a BMP, all waste fire extinguishers in storage in a HWSB are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up or Turn-in Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling turn-ins of waste or excess fire extinguishers.</li> <li>• Scheduled turn-ins as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the fire equipment supply vendor(s) that have been pre-approved to recycle excess or unserviceable fire extinguishers.</li> <li>• Contact the USPFO for information regarding; <ul style="list-style-type: none"> <li>○ DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the extinguisher are applied prior to being shipped.</li> <li>○ Appropriate shipping papers (DD 836) and Turn-in Documentation (2765-1) to accompany fire extinguishers turned-in as surplus federal property.</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for recycled wastes.</li> </ul>	

# GREASE, GAA

(Non-Hazardous Waste)

## GENERAL REQUIREMENTS

- This waste stream includes larger quantities (either used or unused) of grease, including Grease, Artillery and Automotive (GAA) and other varieties of grease used primarily for maintenance of vehicles and other machinery.
- This waste material is a semi-solid at room temperature and cannot be added to the used oil.
- Used GAA and other greases can contain small amounts of toxic metals (such as Cadmium and Lead).
- Wear eye, hand, and clothing protection when handling waste grease.

**Note:** Small amounts of GAA and other greases can be gathered up with rag/wipe and disposed of with non-hazardous (POL contaminated) absorbents (See **WPS 2; Absorbents, POL Contaminated, Non-Hazardous Waste**).

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container





In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a Non-Hazardous Waste container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Unused greases can be set aside for disposal in their original containers. Larger quantities of used grease is to be collected in open (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See [Table 5-3](#)).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Containers with the Following Information as Shown

Required Markings on Drums or Original Containers:	(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> on Drum with Permanent Marker) <div style="text-align: center; margin: 10px 0;">  </div>	
Fill-in Contents Line on Sticker or Write on Drum:	<p><b>Waste Grease, (GAA or other)</b></p> <p>No Date is Required.</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Keep waste POL-based automotive greases separate from vegetable or animal-based cooking greases.</li> <li>• As a P2 option, use-up quantities of off-specification GAA to service semi-trailer fifth-wheel assemblies.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum in close proximity to the area of the shop where waste grease is likely to be generated.</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add used grease to the collection container.</li> <li>• Replace drum lid after adding waste. All waste drums must be kept closed (except when adding waste).</li> <li>• Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of non-hazardous waste grease; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full, move full containers of waste grease to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the disposal contractor.</li> </ul> </li> <li>• As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of waste grease.</li> <li>• Schedule Non-Hazardous Waste pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Non-Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.</li> </ul>	



# LAMPS, USED: Fluorescent and Other (Universal Waste)

## GENERAL REQUIREMENTS

- **This waste stream includes waste lamps generated by NYARNG activities, consisting of the following lamp types;**
  - Fluorescent Tubes (various lengths, 4' is most common), including low Hg (green cap) tubes.
  - Compact Fluorescent Lamps (CFL)
  - High Intensity Discharge (HID), Sodium and Mercury
  - Others (Halogen)
- Lamps contain small amounts of toxic chemicals (such as mercury and cadmium).
- See **WPS 26; Mercury-Containing Devices**, for information on recycling mercury switches and other electrical devices that contain metallic mercury.
- Wear skin, eye and clothing protection when handling used lamps.

**Caution:** Never break lamps on purpose!! Vapors and dust created from breaking lamps can create a breathing and contamination hazard.

- Fluorescent lamps that are accidentally broken can be swept up and recycled as Universal Waste. (See information in Step 3 of this WPS for additional information on handling broken lamps).
- The POC for this guidance is the NYARNG HWM at (518) 786-4347.

### Step 1 | Select an Approved Container



In general, supplies of containers (boxes or pails) for the collection of waste lamps are to be maintained as needed at all NYARNG facilities.

**Check:** To see if a container has already been established for the waste lamp type. If not, select/establish a new accumulation container.

**Approved Container:** Collect fluorescent tubes in their original boxes or fiberboard drums. Collect compact fluorescents and other smaller bulbs in rigid plastic 5-gallon pails that can be sealed tightly.

- Containers that meet these requirements and can be obtained from the waste disposal vendor or purchased locally.
- Reuse old product pails only if they meet the requirements stated above. Remove or paint over labels & markings for the previous product.

### Step 2 | Mark the Container with the Following Information as Shown

Use Pre-printed Sticker as shown, (or write on container with permanent marker)	<b>Universal Waste</b>	
Write on Contents Line (or on container) including the lamp type:	<b>Used Lamps, and Battery Type: (ie...Fluorescent)</b>	
Write on Accumulation Start Date (ASD) line (or on container):	<b>Date first lamp placed into container</b>	
Maximum Hold Time:	<b>1 Year</b>	

### Step 3 Quality Control (General Do and Don'ts)

**Note:** Federal and state waste regulations require broken glass and other pieces generated by the intentional breakage of used lamps to be managed as Hazardous Waste.

- It is a good practice to maintain separate storage locations for boxes of used vs. boxes of new lamps, so they do not get mixed up.
- Placing used lamps into in collection containers carefully. When using the original boxes for fluorescent tubes, dividers are not required.
- Packaging materials/newspaper is recommended to protect smaller lamp types (CFLs) from breaking.
- **If a Fluorescent Lamp is Broken**, manage in accordance with the following steps;
  1. Open windows or exterior doors to air out the room.
  2. Step away from area for 10 to 15 minutes (let dust settle). Keep others out of the area.
  3. Line a cardboard box with a trash bag.
  4. Wear appropriate PPE, including safety eyewear and disposable chemical-resistant gloves.
  5. If available, use a commercial mercury spill kit in accordance with kit directions.
  6. Carefully gather-up glass, dust/powder and other lamp pieces into a pile, gather up with stiff paper and place into lined box. **Do Not** use a broom, dust pan or vacuum cleaner unless specifically designed for mercury cleanup.
  7. Use sticky side of tape to pick-up any glass or powder residue and place in box with lamp pieces.
  8. Wipe down hard surfaces with a damp cloth or paper towel. Place used wipes and PPE in box with lamp pieces.
  9. Close (tie shut) the inner bag, close box flaps and seal with packaging tape. Store with other boxes of used lamps until the next pick-up.
  10. Wash your hand thoroughly after completing the cleanup.

### Step 4 Waste Accumulation Information

- Create a separate collection container for **each Universal Waste lamp type**.
- Accumulate used lamps in a dedicated storage room away from day-to-day activities.
- Open containers slowly, keeping your head/face clear of the opening.
- Add waste lamps and close the container (Keep flaps on boxes and lids on collection pails and fiberboard drums closed/sealed except when adding used lamps).

### Step 5 Store Full Waste Containers in an Approved Location

- Maintain full containers of UW lamps in a HWSB or another secure waste storage location.
  - Waste markings, including the ASD must be clearly visible on all full UW lamp containers in storage awaiting pickup.
  - Full containers will remain in storage until pickup by the lamp recycling vendor.
- All full containers of UW lamps in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).

### Step 6 Pick-up Procedures

#### Waste Pick-ups (See Chapter 6 for Details)

- The FECO is responsible for scheduling pick-ups for full containers of UW Lamps.
- Schedule pickup of full containers of UW Lamps as needed, keeping in mind maximum container hold times and aisle space requirements (3' minimum) in the HWSB.
  - **Remember:** The maximum hold time for a container of UW lamps is 1-year from the ASD. A pickup must be scheduled before the 1-year hold time is exceeded.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Universal Waste Lamps.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).
- See Chapter 8 for details on recordkeeping requirements for disposal of universal waste.


# LEAD SCRAP

(Recycled Waste)

**GENERAL REQUIREMENTS**

- Scrap metal items that contain toxic metals such as Lead (Pb) can cause pollution when they not properly recycled or disposed of.
- Wear eye, hand, and clothing protection when handling lead scrap.
  
- This waste stream is generated by NYARNG shops that perform maintenance on automotive batteries and/or electronic systems. It typically includes;
  - Scrap battery terminals and clamps that are made of lead.
  - Unused or waste solder.
  
- Additional sampling and testing by the waste vendor may be required for waste materials that contain or are contaminated with Pb.
- **In general, lead scrap is exempted from HW determination requirements under federal and state regulations when recycled.**
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

**Step 1 Select an Approved Container**

 In general, supplies of containers for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a container has already been established for this waste material near the scrap metal collection point. If not, select/establish a new accumulation container.

**Approved Containers:** Lead scrap is collected in open top (removable-head) steel or plastic pails.

- Pails can be purchased locally or obtained from the recycling vendor.
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

**Step 2 Mark Containers with the Following Information as Shown**

Required Drum Markings:	(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> ” on Drum with Permanent Marker)  	
Fill-in Contents Line on Sticker or Write on Drum:	<p><b>Lead Scrap</b></p> <p>No Date is Required.</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See <b>WPS 17</b>, <u>Electronic Scrap (E-Scrap)</u> for information on recycling or disposal of scrap electronic items that contain lead solder (such as circuit boards or other components).</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation containers in close proximity to the area(s) of the shop where scrap lead is most likely to be generated (such as a battery or electronics shop).</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add lead scrap to the collection container.</li> <li>• Replace the lid after adding scrap items. All waste containers must be kept closed (except when adding lead scrap).</li> <li>• Stop filling pails before they are full. Maintain recommended headspace (2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of lead scrap for recycling; <ul style="list-style-type: none"> <li>○ No Accumulation Start Date (ASD) is required.</li> <li>○ When full, move full containers to a HWSB or another approved/secure waste storage location.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the recycling contractor or delivered to a scrap metal vendor.</li> </ul> </li> <li>• All waste containers in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of lead scrap.</li> <li>• Schedule Non-Hazardous Waste pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the recycling vendor(s) that have been pre-approved to pick-up or accept lead scrap.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of recycled waste.</li> </ul>	

# MERCURY-CONTAINING DEVICES

## (Universal Waste)

**GENERAL REQUIREMENTS**

- This waste stream includes waste Mercury-Containing Devices (MCDs) generated by NYARNG activities. These wastes must be accumulated for recycling or proper disposal under state and federal Universal Waste regulations.
- MCD wastes include (but not limited to);
  - Electrical equipment that contains mercury switches (thermostats, manometers, auto-hood lights).
  - Thermometers and other vintage medical or weather forecasting equipment (barometers).
- See **WPS 24**; Lamps, Used for more information on recycling lamps that contain mercury vapors.
- Wear skin, eye and clothing protection when handling waste MCDs.

**Caution:** Mercury evaporates readily at room temperature and spills of this material in an enclosed area can create breathing hazards.

**Note:** DO NOT Break Open mercury switches or other MCDs. Leave glass ampules intact to safely contain the waste mercury.

- The POC for this guidance is the NYARNG HWM at (518) 786-4347.

**Step 1 | Select an Approved Container**



In general, supplies of containers (pails) for the collection of waste MCDs are to be maintained as needed at all NYARNG facilities.

**Check:** Waste MCDs are generated very infrequently, so it is likely a container has not already been established for the waste. To establish a new accumulation container;

**Approved Container:** Collect the various types of Universal Waste MCDs in rigid plastic pails 1 to 5 gallons in size that can be sealed tightly.

- Containers that meet these requirements and can be obtained from the waste disposal vendor or purchased locally.
- Reuse old product pails only if they meet the requirements stated above. Remove or paint over labels & markings for the previous product.

**Step 2 | Mark the Container with the Following Information as Shown**

Use Pre-printed Sticker as shown, (or write on with permanent marker)	<b>Universal Waste</b>	
Write on Contents Line (or on container)	<b>Mercury Switches (or other as appropriate)</b>	
Write on Accumulation Start Date (ASD) line (or on container)	<b>Date first MCD is placed into container</b>	
Maximum Hold Time:	<b>1 Year</b>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Re-package MCDs in their original packaging if available, otherwise use packaging materials (newspaper) inside the collection container to cushion the MCDs during handling.</li> <li>• If MCDs are broken or damaged, seal in a container and manage as Universal Waste as described in this WPS.</li> <li>• Report spills from MCDs through the normal chain-of-command for spills of Hazardous Materials.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Accumulate containers of waste MCDs in a dedicated room/area, away from day-to-day shop activities.</li> <li>• Open containers slowly, keeping your head/face clear of the opening.</li> <li>• Add waste mercury switches or other MCDs and close the container (Keep lids on collection pails closed/sealed except when adding waste items).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Move containers of UW MCDs to a HWSB or another secure waste storage location. <ul style="list-style-type: none"> <li>○ Waste markings, including the ASD must be clearly visible on all UW containers in storage awaiting pickup.</li> <li>○ Full containers will remain in storage until pickup by the MCD recycling vendor.</li> </ul> </li> <li>• All full containers of UW MCDs in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of UW MCDs.</li> <li>• Schedule pickup of full containers of UW MCDs as needed, keeping in mind maximum container hold times and aisle space requirements (3' minimum) in the HWSB. <ul style="list-style-type: none"> <li>○ <b>Remember:</b> The maximum hold time for a container of UW is 1-year from the ASD. A pickup must be scheduled before the 1-year hold time is exceeded.</li> </ul> </li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Universal Waste MCDs.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of universal waste.</li> </ul>	

# MRE HEATERS, Unused

(Hazardous Wastes)

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream can include products that are excess or not completely used-up during unit field training activities:
  - Unused quantities of MRE heaters.
    - This product is typically used to heat-up packaged MRE meals that are consumed by soldiers during field training activities.
    - MRE heaters contain Magnesium powder which is regulated for disposal as a reactive HW.
- MRE heaters used in the field for their intended purpose (to heat an MRE) can be disposed of as general refuse.
- MRE heaters discovered in small quantities (6 or less), can simply be mixed with water and disposed of as general refuse once the heat reaction is complete.
- Multi-unit packages (plastic wrap or case lots) of MRE heaters that are excess or become unserviceable must be disposed of as HW.
- Wear eye, hand, and clothing protection when handling containers of waste MRE heaters.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container






In general, supplies of waste collection containers are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste MRE heaters for disposal in their original packaging (plastic wrap and cardboard box) whenever possible. Otherwise collect loose MRE heaters in open top (removable-head) pails.

- Pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they are dry, can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

<p>Required Drum Markings:</p>	<p><b>Write HAZARDOUS WASTE on Container with Permanent Marker (or use Pre-printed Stickers as shown)</b></p> 	
<p>Fill in Contents and *ASD on sticker or write on container</p>	<p><b>Waste MRE Heaters</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for MRE heaters (by manufacturer) must accompany the container(s) when picked-up by the hazardous waste contractor.</li> <li>• Use up MRE heaters during field training activities.</li> <li>• As a P2 measure: Store unused quantities of MRE heaters in a cool, dry location to prevent them from becoming unserviceable.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste MRE heaters.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste MRE heaters to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down).</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste MRE heaters is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste MRE heaters as needed.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	



# NBC DEFENSE KITS and EQUIPMENT

(Hazardous and Non-Hazardous Wastes)

28

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream can include products that are excess or not completely used-up during unit field training activities:
  - Unused quantities of NBC kits and filters.
    - See NBC Equipment - Disposal Information Table at the end of this WPS for specific information regarding the disposal of these materials.
    - NBC equipment identified in the table as non-regulated can be disposed of in a dumpster as General Refuse
- Many of the individual components of excess or unserviceable NBC detector kits must be disposed of as HW.
- Wear eye, hand, and clothing protection when handling waste NBC equipment.

**Note:** Typically, NBC kits and equipment are designated as Type I materials and assigned shelf-life codes with an expiration date. **Type I materials are not extendible.** They must be turned in for disposal once they exceed their shelf life date.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container





In general, supplies of waste collection containers are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste NBC equipment for disposal in their original packaging (plastic wrap and cardboard box) whenever possible. Otherwise collect loose NBC equipment in open top (removable-head) pails.





- Pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they are dry, can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.






### Step 2 Mark the Container with Following Information as Shown

<p>Required Container Markings:</p>	<p>Write <b>HAZARDOUS WASTE</b> on Container with Permanent Marker (or use Pre-printed Stickers as shown)</p> 	
<p>Fill in Contents and *ASD on sticker or write on container</p>	<p><b>Waste NBC Equipment</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for each NBC kit (by manufacturer) must accompany the waste container(s) when picked-up by the hazardous waste contractor.</li> <li>• Use-up NBC equipment during field training activities.</li> <li>• As a P2 measure: Store unused stocks of NBC equipment in a cool, dry location to prevent them from becoming unserviceable between training events.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste NBC equipment.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste NBC equipment to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down).</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste NBC equipment is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste NBC equipment as needed.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

**NBC EQUIPMENT – DISPOSAL INFORMATION TABLE**

NBC Kit Description	Example Pictures	Accumulation Container (other than original package)	Disposal Information
<p>M256A1 Chemical Agent Detector Kit (Training Only)</p>		<p>5-gallon plastic pail</p>	<p>Kits contain methyl alcohol, an ignitable hazardous waste.</p>
<p>M256A1 Chemical Agent Detector Kit</p>		<p>5-gallon plastic pail</p>	<p>Kits contain methyl alcohol, an ignitable hazardous waste.</p>
<p>ABC M18A2 Chemical Agent Detector Kit</p>		<p>5-gallon plastic pail</p>	<p>Dispose of as hazardous waste.</p>
<p>M291 Skin Decontamination Kit</p>		<p>NA</p>	<p>Non-regulated Dispose of as General Refuse</p>

<p>M295 Decontamination Kit</p>		<p>NA</p>	<p>Non-regulated Dispose of as General Refuse</p>
<p>M258 Decontamination Kit</p>		<p>5-gallon plastic pail</p>	<p>Kits contain sodium chloride and isopropyl alcohol and are considered hazardous waste.</p>
<p>M258A1 Personal Decontamination Kit</p>		<p>5-gallon plastic pail</p>	<p>Vial #1 of the M258/A1 kits contain ethanol, phenol, sodium hydroxide and ammonia. Vial #2 contain ethanol, zinc chloride, and chloramine B. Kits are ignitable hazardous waste.</p>
<p>M58A1 Personal Decontamination Kit (Training Only)</p>		<p>5-gallon plastic pail</p>	<p>Kits contain propanol, an ignitable hazardous waste.</p>
<p>M8 Chemical Agent Detector Paper</p>		<p>NA</p>	<p>Non-regulated Dispose of as General Refuse</p>

<p>M9 Chemical Agent Detector Paper</p>		<p>5-gallon plastic pail</p>	<p>Hazardous waste (contains Chromium)</p>
<p>M40/M42 series masks containing the C2A1 charcoal-filled canister (Green Body)</p>		<p>NA</p>	<p>Non-regulated Dispose of as General Refuse</p>
<p>M40/M42 series masks containing the C2 ASC Whetlerite charcoal-filled canister (Black Body) NSN 4240-01-119-2315 or NSN 4240-21-871-7842</p>		<p>5-gallon plastic pail</p>	<p>Filters contain Chromium 6 and Triethylenedamine.  Dispose of as hazardous waste.</p>
<p>Mark I Kits, Atropine Auto-Injectors</p>		<p>5-gallon plastic pail</p>	<p><b>Controlled Medical Item:</b> (Items cannot be disposed of under the Environmental BPA, Contact the NYARNG State Med Command for Pharmaceutical Disposal Policy)</p>
<p>Convulsant Antidote for Nerve Agent (CANA) Auto-Injector</p>		<p>5-gallon plastic pail</p>	<p><b>Controlled Medical Item:</b> (Items cannot be disposed of under the Environmental BPA, Contact the NYARNG State Med Command for Pharmaceutical Disposal Policy)</p>

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# OIL, USED

(Recycled Waste)

## GENERAL REQUIREMENTS

- This waste stream consists of used POL products generated during maintenance operations performed on military vehicles at NYARNG shops.
- Used oil can also contain low concentrations of toxic metals (primarily Cd and Pb) that are harmful to the environment if not recycled or properly disposed of.
- Wear eye, hand, and clothing protection when handling used oil.
- Used oil is regulated in the State of NY as a non-hazardous (recycled) waste when collected and sent to a licensed vendor for recycling.
- Other liquids must not be mixed in with used oil.
  - Liquids that **must not** be mixed in with used oil include: Fuel (diesel, JP-8, or Mogas), Silicone Brake Fluid, FRH Hydraulic Fluid, Windshield Washer Solution, Battery Acid, Flammable HC Products or Water.
  - Collect used Antifreeze and other automotive fluids separate from used oil (See **WPS 8; Antifreeze, Used**).
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 Select an Approved Container



Collection containers for Used Oil are typically maintained on the shop floor at NYARNG maintenance shops in areas where these fluids are most likely to be generated. At some shop locations, used oil is accumulated in small Aboveground Storage Tanks (ASTs)

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Used OIL is typically collected in closed (non-removable) head drums. Containers in the 30 to 55-gallon size range are typically used.

- New (non-removable head) drums can be ordered by NSN (See **Table 5-3**).
- Re-use old POL drums if they can be sealed, are free of oily residue and are not dented, bulging or corroded. Remove/paint over old labels/markings from the previous product.

## Step 2 Mark Container with the Following Information as Shown

Required Drum or Tank Markings:

(Use Pre-Printed Sticker or Write Directly on Drum with Permanent Marker)

# USED OIL



	No Date Required	
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<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
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- **Never Mix Used Oil with Used Antifreeze, collect in separate containers.**
- See precautionary note above for information on segregation of other automotive fluids, fuels and flammable products from used oil.

<b>Step 4</b>	<b>Waste Accumulation Information</b>
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- **Drum openings (lids and plugs) must be kept closed except when adding Used Oil to the container.**
- Open the drum waste collection drum slowly, keeping your head/face away from the opening.
- Remove large bung plug and add used oil to the container, use a funnel to avoid spills.
- When finished adding waste, remove funnel and tightly re-seal bung plug(s). Keep drum sealed (except when adding used oil).
- Stop filling drum before it is completely full. Maintain recommended headspace (4-in. for 55-gallon drum and 3" for 30-gal drum).

<b>Step 5</b>	<b>Store Full Waste Drums in an Approved Location</b>
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- No Accumulation Start Date (ASD) is required.
- When full, move drums of used oil to a HWSB or another suitable and secure waste drum storage location until pickup by the recycling vendor.
- As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).

<b>Step 6</b>	<b>Pick-up Procedures</b>
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- Recycled Waste Pick-ups (See Chapter 6 for Details)**
- The FECO is responsible for scheduling pick-ups of full containers of used oil.
  - Schedule used oil pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.
  - Check the current list of Environmental Waste Contractors to identify the waste recycling vendor(s) that have been pre-approved to pick-up Used Oil.
  - The waste contractor will;
    - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
    - Provide copies of shipping papers (Hazardous Materials Bill-of-Lading).
  - See Chapter 8 for details on documentation and recordkeeping requirements for recycled waste.



# OIL/WATER SEPARATOR and WASHRACK SLUDGE (Hazardous & Non-Hazardous Wastes)

30

## GENERAL REQUIREMENTS

- NYARNG facilities that have sumps or Oil Water Separators (OWSs) associated with floor drains, wash-racks and other controlled drainage structures, must periodically have the sludge that builds up in them cleaned out.
- The actual constituents of the sludge material must be determined by laboratory analysis **prior to removal of the material from the drainage structure**. Possible contaminants include POLs and toxic metals such as lead and cadmium.
- Wear eye, hand, and clothing protection when handling containers of OWS sludge.

**Note:** Shops planning the cleanout of Oil/Water Separators at their facility are to reference the BPAs to identify waste vendor(s) to provide quotes to pre-sample the sludge in-place and then return to remove (pump out) the sludge once sampling results are known. Removal of sludge material from drain systems is typically performed by a vacuum truck service.

- Facilities that clean out OWS or wash-rack sumps by hand must utilize open-head drums to contain the collected sludge and contact the HW vendor to perform sampling and analysis of the waste containers to determine the proper disposal method.
- Once removed from the OWS or drain system, the sludge material must be managed IAW the appropriate container management rules (HW vs Non-HW) as determined by the sampling and analysis process.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste collection containers (drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Pump directly into a vacuum truck or collect in open top (removable-head) drums. If two or more OWSs or sumps will be cleaned at the same time, use separate drums to contain hazardous and non-hazardous sludge materials (as per laboratory analysis performed in Step 1).

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

Required Drum Markings:	<p><b>Write HAZARDOUS or NON-HAZARDOUS WASTE on Drum with Permanent Marker (or use Pre-printed Stickers as shown)</b></p> <div style="display: flex; justify-content: center; align-items: center;"> <span>or</span> </div>	
Fill in Contents and *ASD on sticker or write on drum	<p><b>Waste OWS Sludge</b></p> <p>* For HW sludges, See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See General Requirements section above for information on the different disposal requirements for Hazardous vs. Non-Hazardous sludge.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All waste containers must be closed and sealed except when adding waste sludge.</b></li> <li>• Open drums slowly, keeping your head/face away from the opening.</li> <li>• Waste sludge materials is typically removed from an OWS or sump by pumping into the collection drum.</li> <li>• Replace lid and re-seal top ring with nut/bolt.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a drum of waste sludge is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD for HW sludge.</b> Write the ASD on the pre-printed waste sticker (or directly on the drum) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (<i>See Attachment 8-1</i>). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a hazardous waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Service Scheduling Procedures</b>
<ul style="list-style-type: none"> <li>• The FECO or Shop Chief is responsible for; <ul style="list-style-type: none"> <li>○ Referencing the BPAs to identify vendors to provide quotes for sampling and pump-out of the waste sludge.</li> <li>○ Once quotes are received, coordinate with the facility superintendent to schedule vendor visits for the purpose of sampling and pumping-out of sludge.</li> </ul> </li> <li>• The Facility Superintendent will; <ul style="list-style-type: none"> <li>○ Process the request so a work/purchase order can be issued.</li> <li>○ Notify the Shop Chief to confirm sampling and pump-out dates once the approvals have been received.</li> </ul> </li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous and non-hazardous wastes. <ul style="list-style-type: none"> <li>○ Maintain copies of all analysis and disposal records for the sludge material at the facility for at least three years.</li> </ul> </li> </ul>	

# OXYGEN, COMPRESSED GAS (RECYCLED WASTE)

31

## GENERAL REQUIREMENTS

- This waste stream consists of excess or unserviceable gas cylinders that contain Oxygen, a non-flammable gas typically used in welding operations.
- Oxygen is a non-flammable gas and is not regulated for disposal under state and federal solid waste regulations. While not flammable itself, oxygen gas can enhance the flammability of other materials and should only be release outdoors away from flame or fire sources.
- Wear eye, hand and clothing protection when handling pressurized gas cylinders.
- Process serviceable cylinders for re-use through a compressed gas vendor (See Step 3 for additional information).
- If the cylinder is unserviceable (and compressed gas vendor will not accept), it must be subject to a de-mil procedure (to remove any remaining pressure) prior to disposal as scrap metal. be turned-in to a HW vendor for disposal.

Note: Non-flammable pressurized gas cylinders must be properly stored on site while being accumulated for re-filling or de-mil. See Step 2 below for instructions on how to properly store these items while being accumulated on site awaiting pickup by a welding gas supplier.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 | Select an Approved Container





Establish a collection point in a dedicated area for waste pressurized cylinders that contain (or contained) Oxygen gas. Waste accumulation areas must be dry locations. If to be exchanged by a gas cylinder vendor, store Oxygen cylinders with other empty gas cylinders generated on site (see Note below).

Note: When in storage, gasses that support combustion (Oxygen) must be stored at least 50-feet away from flammable gasses (Acetylene). All pressurized cylinders must be chained to a wall in their upright position with screw-on cap(s) in place while in storage awaiting turn-in.

**Approved Containers:** Outside packaging required for turn-in and transport of pressurized cylinders typically consists of a metal (screw-on) valve protection cover. Smaller cylinders are typically packaged for transport in wooden crates supplied by the waste vendor.

## Step 2 | Mark the Cylinder(s) with Following Information as Shown

Required Package Markings:	<b>Write Non-Hazardous Waste on Cylinder with Permanent Marker (or use Pre-printed Sticker)</b>  	
	<b>Oxygen, Unserviceable</b>  <b>No Date Required</b>	<b>Use a separate sticker on each waste cylinder</b>

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Used (empty) cylinders (that have expelled their contents through normal use), are to be refilled/recharged through a compressed (welding) gas supply contractor.</li> <li>• Surplus (unused) cylinder(s) that still contain Oxygen are to be returned to the compressed (welding) gas supplier for re-issue.</li> </ul> <p><b>Caution, Do Not:</b></p> <ul style="list-style-type: none"> <li>➤ Use a compressed gas cylinder as a roller or support.</li> <li>➤ Accept, issue or use a cylinder if the contents are unknown.</li> <li>➤ Allow open flames within 50-feet of an Oxygen compressed gas cylinder.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• This waste stream consists of unused or unserviceable product and is not typically accumulated for disposal in small batches.</li> <li>• While stored at a NYARNG facility, waste compressed gas cylinders must be stored in an indoor or covered (dry) location that will prevent contact with storm water.</li> </ul>	
<b>Step 5</b>	<b>Store Waste Cylinder in an Approved Location</b>
<ul style="list-style-type: none"> <li>• Once it is determined that a non-flammable gas cylinder is unserviceable and can't be re-filled, the waste cylinder(s) must be moved to a suitable waste cylinder storage location until the de-mil process can be performed. <ul style="list-style-type: none"> <li>○ The de-mil process for waste non-flammable gas cylinders involves venting any remaining product (outdoors), removal of the valve and cutting the cylinder in half.</li> <li>○ Once the de-mil process is complete, the valve and cylinder pieces can be recycled as scrap metal.</li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for coordinating the exchange service for empty welding gas cylinders as needed.</li> <li>• If the cylinders are determined to be unserviceable, the FECO will coordinate de-mil and scrapping of the cylinders as described in Step 5.</li> <li>• Check the current list of shop contractors to identify the compressed gas vendor(s) that have been pre-approved to pick-up or exchange empty gas cylinders.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the material contained in the cylinder are applied prior to being shipped.</li> <li>○ Provide copies of shipping papers (Bill of Lading) as applicable.</li> </ul> </li> <li>• See Chapter 7 for details on documentation and recordkeeping requirements for scrap metal recycling.</li> </ul>	

# PAINT BOOTH FILTERS

(Hazardous Waste)

32

## GENERAL REQUIREMENTS

- This waste stream includes used filters from paint booths and ventilation systems in areas where spray painting operations are performed. This can include larger scale military vehicle spray painting operations typically performed with a paint spray-gun and smaller scale spot painting operations typically performed with aerosol cans.
- Wear eye, hand, and clothing protection when handling HW paint booth filters.

**Note:** Other wastes generated from paint booth operations include items such as floor and bench-top coverings and semi-solid sludge & cakes consisting of dried out paint pigments. These waste materials can be flammable and contain toxic metals such as lead and cadmium.

- Unused quantities of paint are to be disposed of IAW the applicable WPS. See **WPS 33, Paint, Oil/Solvent Based** and **WPS 34, Paint, Water Based** for additional disposal requirements.
- This waste stream may require additional evaluation by the waste disposal vendor (including possible sampling and analysis), to determine if it meets the HW definition.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.
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### Step 1 Select an Approved Container





In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.

**Check:** To see if a container has already been established for collection of this waste material. Typically waste filters will be placed into the same boxes that the new filters come in. If boxes are not available, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Paint Booth Filters in boxes the new filters come in or open top (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.
-

Step 2 Mark the Container with the Following Information as Shown	
<p>Required Drum Markings:</p>	<p>(Use Pre-Printed Sticker or Write “<b>Hazardous Waste</b>” on Drum with Permanent Marker)</p> 
<p>Fill-in Contents Line and *ASD on Sticker or Write on Drum:</p>	<p><b>Used Paint Booth Filters</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>
	
Step 3 Quality Control (General Do and Don'ts)	
<ul style="list-style-type: none"> <li>• See note in Step 1 above for information on additional testing that may be required to determine if other painting wastes (such as used bench-top or floor coverings) can be disposed of as non-hazardous waste.</li> <li>• Whenever possible, keep hazardous waste paint booth filters separate from non-hazardous spray painting wastes.</li> </ul>	
Step 4 Waste Accumulation Information	
<ul style="list-style-type: none"> <li>• <b>All HW containers (boxes or drums) must be kept closed and sealed (ring and bolt tightened), except when adding waste.</b></li> <li>• When performing filter change-outs in a paint booth, utilize the original packaging (cardboard box) to contain the waste filters.</li> <li>• Open waste containers slowly, keeping your head/face away from the opening.</li> <li>• Add HW filters to the collection container, use a sprayer or fine mist from a garden hose to minimize airborne dust.</li> <li>• Close and tape shut box flaps or replace drum lid and seal top ring with nut/bolt.</li> <li>• Stop filling drum before it is completely full. Maintain recommended headspace (4” for 55-gallon drum and 3” for 30-gal drum).</li> </ul>	

## Step 5 Store Full Waste Containers in an Approved Location

- Because this waste is generated infrequently (when filters need changing) the SAA rules do not apply to this waste stream. Each time the paint booth filters are changed out, the containers of waste filters will be moved directly to a HWSB for storage.
- As soon as a container of HW paint booth filters is accumulated (added to a container), fill-in the ASD when waste is first put into the drum.
  - Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.
  - See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.
- Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1).
  - Use the ASD as a reference to determine when a pickup of HW is required.
  - **For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.**

## Step 6 Pick-up Procedures

### Waste Pick-ups (See Chapter 6 for Details)

- The FECO is responsible for scheduling pick-ups for full containers of Hazardous Waste paint booth filters.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).
- See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.

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# PAINT and PRIMER, OIL-BASE

33

(Hazardous Waste)

## GENERAL REQUIREMENTS

- At NYARNG facilities this waste stream includes products that are excess (not completely used-up);
  - Unused stocks of oil and/or solvent-base (flammable or combustible) paint, consisting of excess or unserviceable HM product(s).
  - Excess oil or solvent base paints and primers (not completely used-up) during painting operations on military vehicles or equipment.
  - Excess oil or solvent base paints and primers (not completely used-up) during facility maintenance and remodeling projects.
- In addition to their flammability hazard, oil and solvent base paints can contain pigments that include toxic metal ingredients such as barium, cadmium, chromium and lead.
- Wear eye, hand, and clothing protection when handling waste oil and/or solvent base paint.

**Note:** Waste water-based latex paints must be collected separately from oil or solvent base paints that are rated as flammable HC products. Latex water-based paints are low hazard products and can be disposed of as Non-Hazardous Waste (See WPS 34, Paint, Water-Based).

- Partially full containers of oil or solvent base paints that become unserviceable due to product hardening must also be set aside for disposal as HW. Federal and state regulations forbid the practice of using evaporation for the disposal of products containing flammable liquids.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container



In general, supplies of waste collection containers (pails and drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste oil and solvent base paints for disposal in their original packaging (cardboard box with separators) whenever possible. Otherwise collect in open top (removable-head) pails or drums.


- Drums can be ordered via NSN (See Table 5-3), pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark the Container with Following Information as Shown

Required Container Markings:

Write **HAZARDOUS WASTE** on Container with Permanent Marker (or use Pre-printed Stickers as shown)



<p>Fill in Contents and *ASD on sticker or write on container</p>	<p style="text-align: center;"><b>Waste Oil Base Paint</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	
<p><b>Step 3 Quality Control (General Do and Don'ts)</b></p>		
<ul style="list-style-type: none"> <li>• A copy of the SDS for each waste oil or solvent base paint product (by NSN and Manufacturer) added to a collection pail/drum, must accompany the container(s) when picked-up by the hazardous waste contractor.</li> <li>• As a P2 measure, make every attempt to use up oil or solvent base paint products and take measures to prevent them from becoming unserviceable while in stock.</li> </ul>		
<p><b>Step 4 Waste Accumulation Information</b></p>		
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste oil or solvent base paint.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail or drum, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste oil and solvent based paint products to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down). Steel drums must have the lid sealed with the ring and nut/bolt assembly.</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (4' for 55-gallon drum, 3" for a 30-gal drum and 2" for a 5-gal pail).</li> </ul>		
<p><b>Step 5 Store Full Waste Containers in an Approved Location</b></p>		
<ul style="list-style-type: none"> <li>• When a container of waste oil and/or solvent base paint is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>		

**Step 6 Pick-up Procedures****Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of hazardous waste paint products as needed.
- Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).
- See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.

# PAINT and PRIMER, WATER-BASE

(Non-Hazardous Waste)

34

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream includes unused quantities of water-based (non-flammable) paint that are determined to be excess or unserviceable and are generated by the following processes;
  - Painting operations on military vehicles or equipment that involves the use of water base Chemical Agent Resistant Coatings (CARC).
  - Water base latex paint and related products leftover from facility maintenance/remodeling activities.
- Wear eye, hand, and clothing protection when handling waste paint or paint-related products.
- Some water base specialty paints (such as acrylics, road/sign paint) must have their ingredients evaluated to determine if they are HW. This requires a SDS be supplied to the HW vendor or the HW Manager for each paint product to be disposed of.

**Note: For excess (or partially used) containers of WATER BASE PAINT ONLY:** if determined to be Non-Hazardous Waste (see statement above), these products can be dried-up until there are no free flowing liquids, and disposed of as general refuse. Mix in floor sweep compound, sawdust or other absorbent materials and allow paint cans to stand open/dry-up overnight, then place in dumpster.

**Note:** Oil and solvent base paints are flammable products (have a low flashpoint), and must be segregated for disposed as HW (See WPS 33, Paint and Primer; Oil Base). **Do Not dry out oil base paints.**

- Larger quantities (10 containers or more) of unused water base paints that are unserviceable or excess can be placed in a drum for pickup as Non-Hazardous Waste IAW with this WPS.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container





In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a Non-Hazardous Waste container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Unused water base paints can be set aside for disposal in their original containers. Larger quantities can be collected in open (removable-head) steel drums.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Containers with the Following Information as Shown

Required Markings on Drums or Original Containers:	(Use Pre-Printed Sticker or Write <b>NON-Hazardous Waste</b> with Permanent Marker) 	
Fill-in Contents Line on Sticker or Write on Drum:	<b>Waste Paint, Water Base (Latex or Other)</b>  No Date is Required	

**Step 3 | Quality Control (General Do and Don'ts)**

- A copy of the SDS for each waste water base paint product (by NSN and Manufacturer) added to a collection pail/drum, must accompany the container(s) when picked-up by the non-hazardous waste contractor.
- As a P2 measure, make every attempt to use up water base paint products and take measures to prevent them from becoming unserviceable while in stock.

**Step 4 | Waste Accumulation Information**

- Locate accumulation drum in close proximity to the area of the shop where waste water base paints are likely to be generated.
- Open waste collection containers slowly, keeping your head/face away from the opening.
- Add containers of excess water based paint to the collection container.
- Replace drum lid after adding waste. Keep waste drums closed (except when adding waste).
- Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).

**Step 5 | Store Full Waste Containers in an Approved Location**

- For full containers of non-hazardous waste water base paint;
  - No Accumulation Start Date (ASD) is required.
  - When full, move full containers of waste water base paint to a HWSB or another approved/secure waste storage location.
  - Full containers will remain stored in the HWSB until they are picked-up by the disposal contractor.
- As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).

**Step 6 | Pick-up Procedures****Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of waste water base paint.
- Schedule Non-Hazardous Waste pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Non-Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).
- See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.

# Parts Washing Solutions and Filters

(Hazardous Waste)

35

## GENERAL REQUIREMENTS

- This waste stream includes used solutions and used filters from parts washing equipment, consisting of the following:
  - Washing solutions inside the parts washer machine typically consist of flammable solvent and must be disposed of as Ignitable HW when they are changed out.
  - Washing solutions will stay good for an extended period of time if filters are changed regularly.
- Used filters and solutions from these systems are to be submitted for laboratory testing to determine if they must be disposed of as hazardous waste. See instructions in Step 2 for Container and Marking Requirements.
- Wear eye, hand, and clothing protection when handling waste parts washing solutions or performing filter changes.

**Note:** Used filters may also be hazardous waste

- Waste filters may require additional evaluation (including possible sampling and analysis by the HW vendor), to determine if they meet the HW definition for toxicity.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 Select an Approved Container



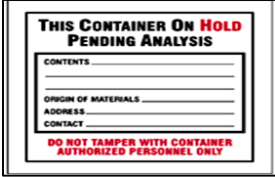




In general, supplies of waste containers (drums) are maintained at NYARNG maintenance shops.

**Check:** To see if a container has already been established for collection of this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Collect Hazardous Waste Parts Washing Solutions in closed top (non-removable-head) steel drums. Use removable-head plastic pails to contain used HW filters.

- New (non-removable head) drums can be ordered by NSN (See Table 5-3).
- Purchase pails locally or obtain from the hazardous waste vendor.
- Re-use old (non-removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

Step 2		Mark the Container with the Following Information as Shown	
Required Container Markings:	<p>(Use Pre-Printed Sticker or Write “<b>Hazardous Waste</b>” on Container with Permanent Marker)</p> 		
Fill-in Contents Line and *ASD on Sticker or Write on Container:	<p align="center"><b>Used Parts Washing Solution</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>		
Required Pail Markings:	<div style="display: flex; justify-content: space-around;"> <div data-bbox="459 877 732 1052">  <p align="center">While Analysis in Process</p> </div> <div data-bbox="805 846 1013 1052">  <p align="center">If found to be HW</p> </div> </div>		
Fill-in Contents Line and *ASD on Sticker or Write on Pail:	<p align="center"><b>Used Parts Washing Filters</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>		
Step 3		Waste Accumulation Information	
<ul style="list-style-type: none"> <li>• All HW containers must be kept closed (drum plugs sealed, pail lids snapped shut), except when adding waste.</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add HW solutions/filters to the appropriate collection container. For liquids, use funnel to avoid spills.</li> <li>• Remove funnel, replace and seal drum plugs. Funnels can stay in place if they have close-able lids.</li> <li>• Stop filling container before it is completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum and 2' for a 5-gal pail).</li> </ul>			

**Step 4 | Store Full Waste Containers in an Approved Location**

- If using the SAA rule, fill-in the Accumulation Start Date (ASD) when drum is full (or no more waste will be added).
  - See Figure 4-1 Waste Accumulation Protocol #1 for additional guidance for managing waste containers in a SAA.
- For HW accumulated (added to a drum) in a HWSB, the ASD must be filled-in when waste is first put into the drum.
  - Waste markings, including the ASD must be clearly visible on all full HW containers in storage in the HWSB awaiting pickup.
  - See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.
- Check ASDs of hazardous waste drums in storage as part of the weekly inspection of the HWSB (See Attachment 8-1).
  - Use the ASD as a reference to determine when a pickup of HW is required.
- **For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.**

**Step 5 | Pick-up Procedures****Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of Hazardous Parts Washing Solutions and/or Used Filters.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).
- See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.



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# PCB-CONTAINING E-SCRAP

(State of NY: Hazardous Waste)

36

## GENERAL REQUIREMENTS

- Vintage (manufactured pre-1977) electronic waste items commonly contained dielectric fluids that include a mixture of chemical compounds known as Poly Chlorinated Biphenyls (PCBs). PCBs can cause pollution when they not properly disposed of.
- This waste stream is regulated under federal waste regulations known as the Toxic Substance Control Act (TSCA). Waste electronic items that contain dielectric fluids containing > 50 ppm PCBs, must be disposed of or recycled IAW federal and state regulations.
- Many PCB-containing electrical devices are still in service today, possible PCB containing waste items generated from NYARNG operations can include;
  - Large electronic waste items, such as transformers (used to route electric power into NYARNG facilities) that contain (or are suspected to contain) PCBs.
  - Small (oil filled) capacitors with 3 Lbs. or more of dielectric fluid (not labeled “No PCBs”). Typically generated during maintenance performed on refrigeration systems.
- Waste items described in this WPS that contain oil with PCB concentrations of 50 ppm or greater are regulated for disposal in the State of NY as Hazardous Waste. PCB waste items must be accumulated in appropriate containers. Containers are picked up by a licensed HW disposal vendor once the container is full or no more waste will be added.
- Contact the HWM for sampling/testing of these types of waste items. **Sampling of larger electronic items should be performed before these items are taken out of service.**

**Note:** The main area of environmental concern with regard to disposal of Electronic Waste containing PCBs is how these items are stored on site while being accumulated for turn in. See Step 2 below for instructions on how to properly store PCB waste while being accumulated at a NYARNG facility.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 | Select an Approved Container






In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** PCB waste is typically collected in open top (removable-head) steel drums or plastic pails.

- New (removable head) pails can be purchased locally or obtained from the HW disposal vendor.
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

Step 2 Mark Containers with the Following Information as Shown		
<p>Required Container Markings:</p>	<p>(Use Pre-Printed Sticker or Write “<b>Hazardous Waste</b>” on Container with Permanent Marker)</p> 	
<p>Fill-in Contents Line on Sticker or Write on Container:</p>	<p><b>PCB Waste</b></p> <p>Fill-in Accumulation Start Date (ASD): <b>The Date Container Becomes Full</b></p>	 <div style="border: 1px solid red; padding: 5px; margin-top: 10px;"> <p>Possible PCB Containing E-Scrap Items. Note: “No PCBs” Stamped on Capacitor</p> </div>
Step 3 Quality Control (General Do and Don'ts)		
<ul style="list-style-type: none"> <li>• See <b>WPS 17, <u>Electronic Scrap (E-Scrap)</u></b> for information on recycling waste electronic devices that do not contain PCB oils.</li> </ul>		
Step 4 Waste Accumulation Information		
<ul style="list-style-type: none"> <li>• Locate accumulation container in close proximity to the area of the shop where PCB-containing waste items are most likely to be generated (such as an electronics or refrigeration shop).</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add PCB waste items to the collection container.</li> <li>• Replace the lid after adding waste. Keep waste containers closed (except when adding waste).</li> <li>• Stop filling pail before completely full. Maintain recommended headspace (2” for a 5-gal pail).</li> </ul>		
Step 5 Store Full Waste Containers in an Approved Location		
<ul style="list-style-type: none"> <li>• For containers of PCB waste awaiting disposal; <ul style="list-style-type: none"> <li>○ When full or no more PCB waste items will be added, move containers to a HWSB or another approved/secure waste storage location.</li> <li>○ The Accumulation Start Date (ASD) is required on all full containers of PCB waste in storage.</li> <li>○ Full containers will remain stored in the HWSB until they are picked-up by the HW disposal contractor.</li> </ul> </li> <li>• All hazardous (PCB) waste containers in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).</li> </ul>		

<b>Step 6</b>	<b>Pick-up Procedures</b>
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**Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of hazardous (PCB) wastes.
- Schedule pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.
- Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up PCB waste.
- The waste contractor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).
- See Chapter 8 for details on documentation/recordkeeping requirements for disposal of hazardous (PCB) waste.

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# PESTICIDE PRODUCTS

(Hazardous Waste)

37

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream includes unused quantities of pesticide products (including herbicides, fungicides, insecticides and rodenticides) that are determined to be excess or unserviceable.

**Note:** Pesticide applications for pest management at NYARNG facilities are to only be conducted by Certified Pesticide Applicators. The NYARNG Does Not currently have a Certified Pesticide Applicator on staff.

- NYARNG facility employees should not procure pesticide products for use at the facility without approval. Only exception is for single containers (aerosol can) of Wasp/Bee/Hornet available over the counter as a local purchase.
- Always wear recommended eye, hand and clothing protection when handling pesticides.
- All pesticide products designated for disposal must have their ingredients and other information evaluated to determine if they are HW or UW. This requires a SDS submitted to the HW waste vendor or the HWM for each pesticide product to be disposed of.

**Note:** Some pesticides that have expired or have been discontinued from manufacture can be disposed of under the Universal Waste regulations. However, most waste pesticide products are not eligible for disposal as Universal Waste and must be disposed of as Hazardous Waste.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 | Select an Approved Container



In general, supplies of waste collection containers (pails and drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste pesticide products for disposal in their original packaging (cardboard box with separators) whenever possible. Otherwise collect in open top (removable-head) pails.

- Pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

## Step 2 | Mark the Container with Following Information as Shown

Required  
Container  
Markings:

Write **HAZARDOUS** or **UNIVERSAL WASTE** on Container with Permanent Marker (or use Pre-printed Stickers as shown)




OR



As determined by HWM



<p>Fill in Contents and *ASD on sticker or write on container</p>	<p style="text-align: center;"><b>Waste Pesticides</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	
<p><b>Step 3 Quality Control (General Do and Don'ts)</b></p>		
<ul style="list-style-type: none"> <li>• In general, most pesticides are regulated for disposal as HW due to their toxic nature. The term "cide" means "to kill", and that is exactly what pesticides are designed to do. Personnel should minimize their exposure by not purchasing pesticide products.</li> <li>• See precautionary notes on container labels for specific pesticide handling information. <ul style="list-style-type: none"> <li>○ Any use or handling of pesticides that is not in accordance with label instructions is a violation of federal regulations under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).</li> </ul> </li> <li>• A copy of the SDS for each waste pesticide product (by NSN and Manufacturer) added to a collection pail, must accompany the container(s) when picked-up for disposal.</li> </ul>		
<p><b>Step 4 Waste Accumulation Information</b></p>		
<ul style="list-style-type: none"> <li>• <b>All containers of HW/UW must be closed/sealed except when adding waste pesticides.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail, open slowly, keeping your head/face away from the opening.</li> <li>• Add waste pesticide products to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down).</li> <li>• Stop filling containers before completely full. Recommended headspace is 2" for a 5-gal pail.</li> </ul>		
<p><b>Step 5 Store Full Waste Containers in an Approved Location</b></p>		
<ul style="list-style-type: none"> <li>• When a container of waste pesticides is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>		
<p><b>Step 6 Pick-up Procedures</b></p>		
<ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of waste pesticides as needed.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste pesticides.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous and universal wastes.</li> </ul>		

# POTASSIUM HYDROXIDE SOLUTION

38

(Hazardous Waste)

## GENERAL REQUIREMENTS

- At NYARNG facilities, this waste stream can include HM products that are excess (not completely used-up) during repair of military vehicles or equipment, including:
  - Unused or unserviceable quantities that consist of solutions of Potassium Hydroxide.
    - This chemical compound is a typical ingredient of industrial-strength soaps, detergents and other cleaning products.
    - Products that contain Potassium Hydroxide are alkaline (basic) liquids and meet the definition of a corrosive hazardous waste (pH>12.5) when disposed of.
- Wear eye, hand, and clothing protection when handling Potassium Hydroxide solutions.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

## Step 1 Select an Approved Container






In general, supplies of waste collection containers (pails and drums) are maintained at NYARNG maintenance shops.

**Approved Containers:** Collect waste Potassium Hydroxide solutions for disposal in their original packaging (cardboard box with separators) whenever possible. Otherwise collect small containers in open top (removable-head) pails or drums.

- Drums can be ordered via NSN (See Table 5-3), pails can be purchased locally or obtained from the hazardous waste disposal vendor.
- Re-use old (removable head) POL drums or pails if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

## Step 2 Mark the Container with Following Information as Shown

<p>Required Container Markings:</p>	<p>Write <b>HAZARDOUS WASTE</b> on Container with Permanent Marker (or use Pre-printed Stickers as shown)</p> 	
<p>Fill in Contents and *ASD on sticker or write on container</p>	<p><b>Waste Potassium Hydroxide Solution</b></p> <p>* See Step 5 of this WPS for information on when to fill in the Accumulation Start Date (ASD).</p>	



<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• A copy of the SDS for each waste product that contains Potassium Hydroxide (by NSN and Manufacturer) added to a collection pail/drum, must accompany the container(s) when picked-up by the hazardous waste contractor.</li> <li>• As a P2 measure, make every attempt to use up products containing Potassium Hydroxide solution and take measures to prevent them from becoming unserviceable.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All containers of HW must be closed and sealed except when adding waste Potassium Hydroxide solutions.</b></li> <li>• If utilizing original packaging, keep flaps of boxes closed/taped shut.</li> <li>• When collecting in a pail or drum, open slowly, keeping your head/face away from the opening.</li> <li>• Add small containers of waste products containing Potassium Hydroxide to the collection container.</li> <li>• Replace lid on pail and seal (snap or screw down). Steel drums must have the lid sealed with the ring and nut/bolt assembly.</li> <li>• Stop filling containers before completely full. Maintain recommended headspace (4' for 55-gallon drum, 3" for a 30-gal drum and 2" for a 5-gal pail).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• When a container of waste Potassium Hydroxide solution is full (or no more waste will be added) it must be moved to a HWSB or another approved waste storage location until it is picked up for disposal. <ul style="list-style-type: none"> <li>○ <b>Fill-in the ASD.</b> Write the ASD on the pre-printed waste sticker (or directly on the container) with a permanent marker.</li> <li>○ Waste markings, including the ASD must be clearly visible on all HW containers in storage in the HWSB awaiting pickup.</li> <li>○ See Figure 4-2 Waste Accumulation Protocol #2 for additional guidance for managing waste containers in a HWSB.</li> </ul> </li> <li>• Check ASDs of hazardous waste containers in storage as part of the weekly inspection of the HWSB (See Attachment 8-1). <ul style="list-style-type: none"> <li>○ Use the ASD as a reference to determine when a waste pickup is required.</li> <li>○ <b>For a SQG facility, maximum hold time for a container of HW is 180 days after the ASD.</b></li> </ul> </li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of hazardous waste Potassium Hydroxide as needed.</li> <li>• Pickups of HW will be scheduled so the 180-day maximum hold time for a full container in storage is not exceeded.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Uniform Hazardous Waste Manifest) and other required waste tracking documents such as a Land Disposal Restriction (LDR) form (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of hazardous waste.</li> </ul>	

# SHOP RAGS and TOWELS, LAUNDRY SERVICE

(Recycled Waste)

## GENERAL REQUIREMENTS

- This waste stream includes shop rags and towels that are sent to a laundry service to be cleaned and reused multiple times. These items become contaminated with POLs and hazardous products during normal use.
- Laundered shop rags/towels must be collected separately for pickup by a licensed laundry service as described below.
- Used (one-time use) absorbents/paper wipes must be segregated (collected in a separate collection containers) from shop rags/towels. (See **WPS 1, Absorbents, Hazardous** and **WPS 2, Absorbents, Non-Hazardous**).
- Wear eye, hand, and clothing protection when handling contaminated shop rags/towels.

**Note:** Because they are cleaned by an industrial cleaning process and used multiple times, shop rags/towels are exempted from the Hazardous Waste regulations. The laundry service that provides the shop rag/towel service is permitted to treat extracted wastes under discharge limits dictated by the federal/state Clean Water Act.

- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container





In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at all NYARNG maintenance shops.

**Approved Containers:** Shop rags/towels are collected in red safety cans or similar collection containers typically provided by the laundry service vendor.

- Alternatively removable head drums can be ordered by NSN (See Table 5-3) and used to collect this waste.
- Old (removable head) POL containers can be re-used as collection containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Containers with the Following Information as Shown

<p>Required Container Markings:</p>	<p>Write on Collection Container with Permanent Marker</p>	
<p>Write on Container:</p>	<p><b>Used Rags – Laundry Contract</b> No Date is Required</p>	

**Step 3 | Quality Control (General Do and Don'ts)**

- As a P2 option, re-use shop rags/towels as much as possible before placing in collection container to be laundered.
- Do Not mix other (one-time use) used absorbents in with used shop rags/towels. Collect used absorbents in separate containers for disposal. See WPS 1 and WPS 2 for more information on proper disposal of hazardous and non-hazardous waste absorbents.
- Used shop rags/towels for laundering are typically gathered up from various collection points around the shop and brought to a central collection container at the end of each operating day.

**Step 4 | Waste Accumulation Information**

- Locate collection container(s) in close proximity to the area of the shop where waste shop rags/towels are likely to be generated.
- Open waste collection containers slowly, keeping your head/face away from the opening.
- Add used shop rags/towels to the collection container.
- If using a drum, replace lid after adding waste. All waste collection containers must be kept closed (except when adding waste).
- Stop filling collection containers before they are completely full. Maintain recommended headspace (4" for 55-gallon drum, 3" for 30-gal drum and 2" for a 5-gal pail).

**Step 5 | Store Full Waste Containers in an Approved Location**

- For full containers of used shop rags/towels;
  - No Accumulation Start Date (ASD) is required.
  - Full containers will be stored in the HWSB or another suitable storage location until they are picked-up by the laundry service vendor.
- As a BMP, all waste containers in storage (including non-hazardous wastes) are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1).

**Step 6 | Pick-up Procedures****Waste Pick-ups (See Chapter 6 for Details)**

- The FECO is responsible for scheduling pick-ups for full containers of used shop rags/towels.
- Schedule pickups as needed, service calls by vendor are usually on a set schedule (weekly).
- Check the current list of Environmental Waste Contractors to identify the industrial laundry service vendor(s) that have been pre-approved to pick-up used shop rags & towels.
- The shop towel service vendor will;
  - Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.
  - Provide copies of shipping papers (Non-Hazardous Waste Manifest or Hazardous Materials Bill-of-Lading).
- See Chapter 8 for details on documentation/recordkeeping requirements for disposal of non-hazardous waste.

**Note:** State of NY regulations require a one-time Land Disposal Restriction Notice be completed and placed on-file at facilities that utilize shop rag/towel laundry services. A copy of this notice for NYARNG operations is included as an attachment to this WPS.

**Land Disposal Restrictions One-Time Notice to  
File [6NYCRR Part 376.1(g)(vii)]**

**1. Generator information:** Name NYS Division of Military & Naval Affairs

Address: See Attached Facility Listing

EPA ID No. - See Attached Facility Listing

6NYCRR Part 376.1(g)(vii) If a generator determines that the generator is managing a prohibited waste that is excluded from the definition of hazardous or solid waste or is exempted from hazardous waste regulation under subdivisions 371.1(c) through subdivision 371.1(g) of this Title subsequent to the point of generation (including deactivated characteristic hazardous wastes managed in wastewater treatment systems subject to the Clean Water Act (CWA) as specified in subparagraph 371.1(e)(1)(ii) of this Title, or that are CWA-equivalent, or are managed in an underground injection well regulated by the SDWA and permitted under SPDES), the generator must place a one-time notice describing such generation, subsequent exclusion from the definition of hazardous or solid waste or exemption from hazardous waste regulation, Parts 370 through 374 and Part 376, of this Title, and the disposition of the waste, in the facility's on-site files.

**2. Waste description at point of generation:**

Waste stream(s) Laundered Rags

Waste codes D001, F001

Description of waste generation: Rags and shop towels generated may be contaminated with a number of chemicals used in the shop. The most likely contaminants are petroleum, oils & lubricants (POL's), adhesives and solvents that may be flammable or toxic.

**3. Waste disposition:**

Subsequent exclusion or exemption: NYS DEC's Policy DSH-HW-03-09 entitled Regulatory Status of Laundered Industrial Rags & soiled Clothing. It is the policy of the division that shop towels, industrial rags, and soiled clothing ("towels/rags/clothing") that have become contaminated with incidental amounts of hazardous solvents may be sent to industrial laundries (or laundered on site) as non-hazardous waste, provided certain conditions are met (as per sec V of Policy) ..3. At the time the towels/rags/clothing are loaded onto the vehicle that will initiate the delivery to the off -site industrial laundry....., the towels/rags/clothing do not contain free liquids....., and no free liquids are in the containers.

**Current disposition:** In general, a laundry owns reusable industrial wipes, rents them to us under contract, and collects them for laundering on a regular basis. We receive deliveries of wipes from the laundries, use them, and accumulate used wipes. No free liquids are present in the drum. Drivers, most often employed by the laundries, pick up the contaminated industrial wipes, replacing them with clean wipes at the same time, and then return the soiled wipes to the laundry. Once at the laundry, the wipes are then counted to assure the laundry is getting back from the generator the same number sent out and finally, are cleaned before entering the cycle again. All rags are laundered at an off-site facility. The laundering contract is renewed with our military facilities/generators on an annual basis.

**4. Signature:**

*Heidi M. Unwin*

Heidi M. Unwin Env Specialist II

3/15/13

Generator's signature

Printed/typed name & title

Date

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# WEAPONS CLEANING RAGS and PATCHES, USED

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(Hazardous and Non-Hazardous Waste)

## GENERAL REQUIREMENTS

- This waste stream includes used weapons cleaning materials consisting of patches, rags, wipes, swabs, pipe cleaners and bench/table-top coverings that will become contaminated with CLP and lead residue during weapons cleaning operations.
- After use, these products must be collected separately from general refuse as described below.
- Wear eye, hand, and clothing protection when handling used weapons cleaning materials.

**Note:** Do not use CLP products with a manufacture date of 1994 or earlier. Supplies of CLP from this era contains the toxic chlorinated solvent Trichloroethylene. If identified in existing stocks, containers are to be considered unserviceable and set aside for disposal as HW (See WPS 15, CLP).

- Waste weapons cleaning materials requires additional evaluation (including possible sampling and analysis by the HW vendor), to determine if lead content is enough to meet the toxic HW definition.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Select an Approved Container




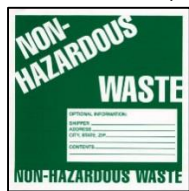


In general, supplies of containers (drums) for the collection of each waste type generated are to be maintained as needed at NYARNG facilities.

**Check:** To see if a container has already been established for this waste material. If not, select/establish a new accumulation container.

**Approved Containers:** Non-Hazardous Waste weapons cleaning materials generated in small amounts can be collected in clear plastic trash bags (triple bagged). Larger quantities are collected in open (removable-head) steel drums, triple lined with three clear plastic trash bags.

- New (removable head) drums can be ordered by NSN (See Table 5-3).
- Re-use old (removable head) POL containers if they can be tightly sealed and are free of dents, bulging or corrosion. Remove/paint over old labels/markings from the previous product.

### Step 2 Mark Containers with the Following Information as Shown

<p>Required Container Markings:</p>	<p>(Use Pre-Printed Sticker or Write <b>Hazardous Waste</b> or <b>NON-Hazardous Waste</b> on container with Permanent Marker)</p> <div style="display: flex; justify-content: center; align-items: center;">  <span style="margin: 0 10px;">Or</span>  </div>	<div style="text-align: center;">     </div>
<p>Fill-in Contents Line on Sticker or Write on Container:</p>	<p style="text-align: center;"><b>Used Weapons Cleaning Materials</b></p> <p style="text-align: center;">If Non-HW: No ASD is Required If HW: Apply ASD When Full and Sample Results Received</p>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• See precautionary note above: do not use CLP that has a manufacture date of 1994 or earlier.</li> <li>• As a P2 option, re-use weapons cleaning materials as much as possible before discarding into waste collection container. Make sure only CLP contaminated materials are segregated for disposal as Hazardous or Non-Hazardous Waste.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• Locate accumulation drum in close proximity to the area of the facility where the waste is likely to be generated (where and when weapons cleaning operations are performed).</li> <li>• Open waste collection containers slowly, keeping your head/face away from the opening.</li> <li>• Add used (CLP contaminated) weapons cleaning materials to the collection container.</li> <li>• If using triple plastic bags, tie bag tops closed after adding waste.</li> <li>• If using a drum, replace lid after adding waste. All waste drums must be kept closed (except when adding waste).</li> <li>• Stop filling drums before they are completely full. Maintain recommended headspace (4" for 55-gallon drum and 3" for 30-gal drum).</li> </ul>	
<b>Step 5</b>	<b>Store Full Waste Containers in an Approved Location</b>
<ul style="list-style-type: none"> <li>• For full containers of waste weapons cleaning materials; <ul style="list-style-type: none"> <li>○ The Accumulation Start Date (ASD) is required on drums/containers of HW. No ASD is required on containers of Non-Hazardous Waste</li> <li>○ When full (or no more waste will be added), move waste containers to a HWSB or another approved/secure waste storage location.</li> <li>○ Full waste containers will remain stored in the HWSB until they are sampled and picked-up by the disposal contractor.</li> </ul> </li> <li>• All hazardous waste containers in storage are to be checked weekly as part of the routine inspection of the HWSB (See Attachment 8-1). As a BMP, containers of Non-Hazardous Waste in storage are also included in this inspection.</li> </ul>	
<b>Step 6</b>	<b>Pick-up Procedures</b>
<p><b>Waste Pick-ups (See Chapter 6 for Details)</b></p> <ul style="list-style-type: none"> <li>• The FECO is responsible for scheduling pick-ups for full containers of waste weapons cleaning materials.</li> <li>• Schedule waste pickups as needed, keeping in mind aisle space requirements (3' minimum) in the HWSB.</li> <li>• Check the current list of Environmental Waste Contractors to identify the waste disposal vendor(s) that have been pre-approved to pick-up Hazardous and/or Non-Hazardous Waste.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers (Hazardous Waste Manifest or Non-Hazardous Materials Bill-of-Lading).</li> </ul> </li> <li>• See Chapter 8 for details on documentation/recordkeeping requirements for disposal of hazardous and non-hazardous waste.</li> </ul>	

# WOOD, TREATED

(Non-Hazardous Wastes)

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## GENERAL REQUIREMENTS

- Pressure treated wood manufactured in the US before 2004 (identified by it's green color) was typically treated with a preservative containing an arsenic compound.
  - Treated wood waste can still be generated as part of remodeling or demolition projects involving vintage outdoor decks or other structures at NYARNG facilities.
- Other commonly used wood preservatives consist of coal tar coatings containing the chemical compound Creosote. This material was typically used on power poles and RR ties, and is identified by its thick-black oily nature.
- Wear eye, hand, and clothing protection when handling treated wood.
- The actual constituents of any treated wood to be demolished must be determined in advance (possibly by laboratory analysis), prior to demolition and waste disposal activities.

**Note:** Treated wood is exempted under federal and state regulations and can be handles as a non-hazardous waste [See 40 CFR 261.4(b)(9)]. In the State of NY, waste treated wood must be disposed of in landfills licensed to accept construction and demolition debris.

- Facilities that will be generating waste treated wood must contact the HW Mgr to evaluate the type and amount of wood waste that will be generated.
  - Information will be used to determine the nearest landfill site that is licensed to accept the material.
- The POC for this guidance is the NYARNG HWM and can be reached at (518) 786-4347.

### Step 1 Approved Container



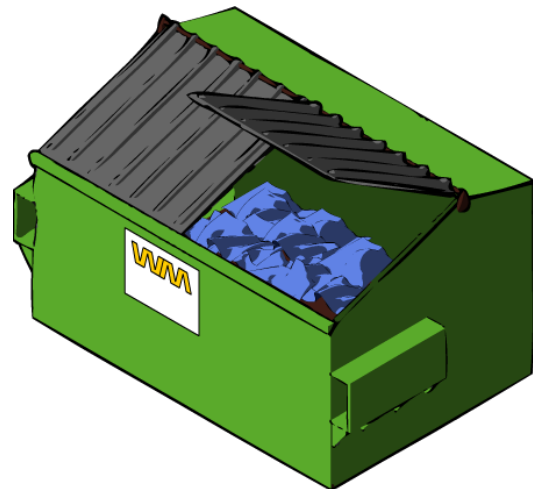
Coordination of demolition projects with the waste site that will accept the material is essential for quick and efficient removal of this waste material.

**Approved Containers:** Collect treated wood waste in roll-off containers supplied by the waste vendor that will accept the waste material.

### Step 2 Mark the Container with Following Information as Shown

Recommended Markings:

**Treated Wood Scrap Only**





<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Keep treated wood scraps out of the general refuse dumpster until the HWM can verify that the local landfill can accept the waste material.</li> <li>• DO NOT burn treated wood. This action will release toxins in the smoke and concentrate arsenic in the ash material.</li> <li>• DO NOT shred treated wood for use as mulch material. This action can release toxins into the soil.</li> </ul>	
<b>Step 4</b>	<b>Waste Accumulation Information</b>
<ul style="list-style-type: none"> <li>• <b>All waste dumpsters closed except when adding wood waste.</b></li> <li>• Open dumpsters slowly, keeping your head/face away from the opening.</li> <li>• Stop filling dumpster before it is completely full. Lids must stay closed during transport.</li> </ul>	
<b>Step 5</b>	<b>Pick-up Procedures</b>
<ul style="list-style-type: none"> <li>• When the dumpster is full (or no more waste will be added) it will be scheduled for pickup.</li> <li>• The FECO is responsible for notifying the HWM or demolition project manager to schedule pick-ups.</li> <li>• The waste contractor will; <ul style="list-style-type: none"> <li>○ Ensure DOT required Proper Shipping Name and Labeling/Markings specific to the hazard class of the waste material are applied to all waste containers prior to being shipped.</li> <li>○ Provide copies of shipping papers and waste tracking documents (as applicable).</li> </ul> </li> <li>• See Chapter 8 for details on documentation and recordkeeping requirements for disposal of non-hazardous wastes.</li> </ul>	

## Chapter 6      **Turning-in Hazardous Materials and Waste**

The Environmental Office contracts several waste disposal contractors to pick up, transport and dispose of environmental waste from our facilities. The waste contractors pick up and dispose of non-hazardous waste, hazardous waste, universal waste and used oil. This contract also includes sampling, testing, analysis, to include packaging the waste, DOT labeling and preparing waste shipment documentation. The Environmental Office will provide NYARNG facilities a list of pre-approved Environmental Waste Contractors. Refer to the [WPSs](#) in Chapter 5 for specific accumulation and storage procedures for these wastes.

Waste generated at **maintenance facilities** is to be turned in through the use of the list of approved Environmental Waste Contractors. The FECO/shop chief is responsible for determining and making contact with the approved contractor(s) for the turn in of waste from their facility.

Waste generated by units and other federally supported activities at **armories collocated with maintenance shops** are turned in to the maintenance shop. UECOs should coordinate the turn in of any wastes with the FECO/shop chief. They should discuss when and how waste is brought to the shop and who will complete the necessary paperwork.

Regulated waste generated by units and other federally supported activities at **stand-alone armories or other facilities that are not collocated** with a maintenance facility cannot be transported to any other NYARNG facility. Facilities that are not collocated with a maintenance facility should contact the HWM to request that a contractor pick-up HW directly from their facility or location. The supporting FMS will utilize the approved EWC list to help coordinate the waste disposal. However, the waste amount(s) will be counted under the EPA ID number and generator status for the generating facility (armory) and not the supporting FMS.

Waste generated by **state supported activities** (not federally supported) including state maintenance personnel will be handled on a case by case basis with the state HWM. In these cases, the personnel will contact one of the approved waste contractors to obtain estimates for the waste disposal. The disposal is paid for through state funding. Please contact the state HWM for assistance. The HWM will require copies of all transportation and disposal documentation.

### **Environmental Waste Agreements (EWA)**

At maintenance facilities, the NYARNG uses contracts to establish agreements with licensed waste vendors for removing and disposing of HW, non-hazardous waste, UW, and used oils. Be sure to read the Environmental Waste Agreements thoroughly.

Initial funding for waste disposal is provided at the beginning of each Federal fiscal year (FY) so that FMSs, CSMSs, and AASFs can remove, test, and dispose of waste and materials.

When you have waste to be removed complete the following steps:

- STEP 1. Identify the waste you would like to dispose of.
- STEP 2. Contact the contractors on the EWA list for an estimate on the cost to remove the waste.
- STEP 3. Before having the vendor remove waste or perform any service, facilities **MUST** obtain a requisition number from the Environmental Office at (518) 786-4347. The contractor must include the requisition number on all invoices. The Contractor is not permitted to obtain requisition numbers for you.
- STEP 4. Contact the appropriate contractor and provide them with the requisition number and schedule a waste pick up. Refer to the *Waste Turn-In Procedures* section later in this chapter to determine tasks to be performed by the contractor.

## **Waste Turn-in Procedures**

- STEP 1. Review the WPS in Chapter 5 to see which wastes must be segregated from the solid waste streams and turned-in for proper disposal.
- STEP 2. For wastes being turned in, verify that containers are correctly marked and labeled IAW the WPS before the transfer occurs.
- STEP 3. For HW, close and seal boxes, drums, or other containers. For liquid wastes allow the proper amount of headspace IAW [Chapter 5](#). When sealing boxes, use packing/shipping tape. **DO NOT** use duct tape or masking tape.

Removable-head drums must be sealed with the ringbolts down. Screw locking nuts into the middle section of the bolt before turn-in. For closed-head drums, all bung plugs must be tightly sealed.

- STEP 4. **Federal Maintenance Facilities and NYARNG Units**  
For each waste stream (hazardous and non-hazardous) and/or excess/unserviceable HM item, fill out a DA Form 2765-1. An example DA Form 2765-1 and directions for completing it are located in the forms section at the end of this chapter. Alternatively for multi-item turn-ins, use a spreadsheet to inventory items for waste turn-in, including the same information requested on the DA 2765-1.

**State Maintenance Personnel (Including Armory Superintendents)**

For each HW or excess/unserviceable HM, contact the NYS DMNA State Facilities office to request funding and for a purchase order to be issued for disposal. Contact the HWM for assistance in obtaining an EPA ID number or with other questions regarding the disposal of the waste.

**Note:** UECOs at armories collocated with their supporting FMS must coordinate with the Shop Chief/FECO for the turn in of waste, including who will complete the required paperwork.

Make sure the following documents accompany each shipment:

- DA Form 2765-1 (or Spreadsheet Containing an Inventory of Multiple Waste Turn-in Items)
- SDSs (for excess HM items)
- Waste profile or analytical results (if applicable)

**Gathering Waste Turn-in Documents**

To gather turn-in documents (Figure 6-1) complete the following steps:

STEP 1. Close each accumulation container being turned in and ensure that no more waste is added.

STEP 2. Estimate the weight of the closed waste container(s). One way to do this is to multiply the number of gallons by 8.3 lbs. per gallon. Other ways to estimate weight include the following:

- **Solid Objects** -- Check the General Information section of the SDS to obtain the Net Unit Weight. If this information is listed, use the following formula to estimate the weight:

$$\text{Net unit weight} \times \text{number of units on hand}$$

Example: An SDS for Lithium batteries lists the Net Unit Weight as 1.25 lbs. You have 10 Lithium batteries (with identical NSNs) in a box.

$$1.25 \text{ lbs. per battery} \times 10 \text{ batteries} = 12.5 \text{ lbs. of batteries}$$

- **Unused Liquids in Original Containers** -- Check the outside of the container and/or the General Information section of the SDS for the Net Unit Weight marking. If this information is listed, use the formula below:

$$\text{Net unit weight} \times \text{number of units on hand}$$

Example: The SDS for a 5-gallon can of paint lists the Net Unit Weight as 45.5 lbs. You have 4 cans of the paint (with identical NSNs).

$$45.5 \text{ lbs. per can} \times 4 \text{ cans} = 182 \text{ lbs. of paint}$$

- **Unused liquids not in the original container or partially used liquids** -- Consult the SDS and obtain the specific gravity. Then use the following formula:

*8.3 lbs. X the specific gravity of the waste  
X the number of gallons being disposed of*

**Note:** *Water weighs 8.3 lbs. per gallon (lbs./gal.). By multiplying this standard number by the specific gravity of your waste by the number of gallons, you can determine how many pounds one gallon of the waste weighs.*

Example: You have 55 gallons of Denatured Alcohol to dispose of. The SDS for Denatured Alcohol lists the specific gravity as 0.8150. The following calculations will tell you the weight per gallon of the Denatured Alcohol:

$$8.3 \text{ lbs.} \times 0.8150 = 6.76 \text{ lbs./gallon}$$

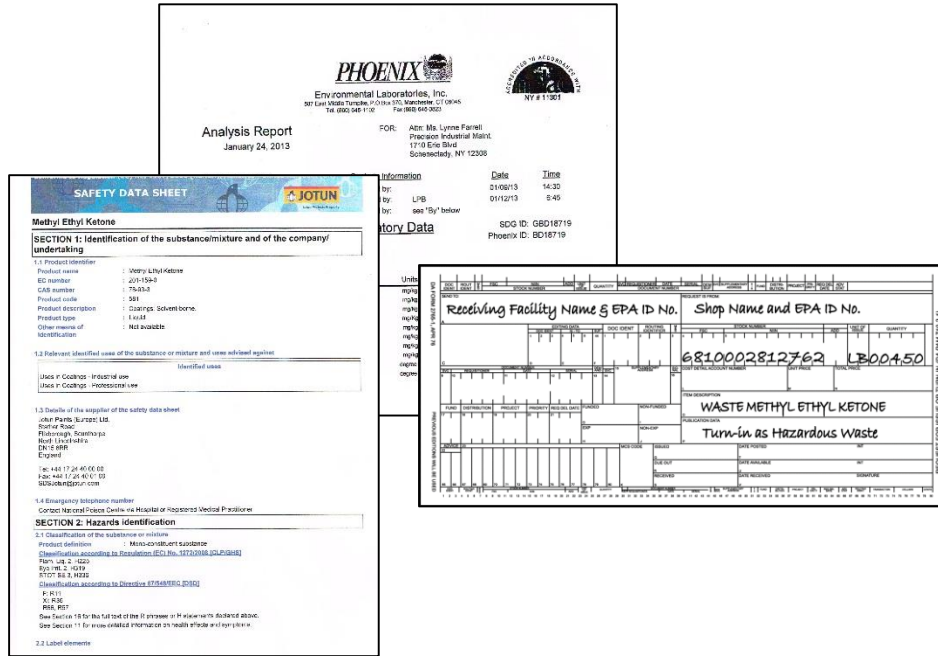
You have 55 gallons of Denatured Alcohol. The following calculation will tell the total weight:

$$6.76 \text{ lbs./gal.} \times 55 \text{ gal.} = 371.8 \text{ lbs. of Denatured Alcohol}$$

**Note:** *If you cannot determine the weight of your waste using the above information, contact your UECO, FECO, or your supervisor.*

- STEP 3. For reference, obtain the WPSs for each waste being turned in.
- STEP 4. For each waste being turned in, make a copy of each applicable SDS from the SDS Binder.
- STEP 5. Contact the HWM for copies of any analytical results for the waste. *Most waste will not have lab analysis paperwork.*
- STEP 6. Make a copy of the DA Form 2765-1.

Figure 6-1: Waste Turn-In Documents



## Waste Turn-in Procedures

This section details procedures for HW disposal through various vendors.

Table 6-1: Hazardous Waste Disposal Procedures

Task Number	Performed By	Task
1	Generating Unit or Activity	Obtain SDSs, and Lab Analyses (if applicable) for the waste to be disposed of.
2	Generating Unit or Activity	Contact vendor for disposal quote.
3	Generating Unit or Activity	Before contacting a vendor for picking up waste, contact the Environmental Office at (518) 786-4347 to obtain a requisition number.
4	Generating Unit or Activity	Contact the appropriate vendor on the EWA list to pick up waste. (If you do not have this list, contact the Environmental Office for a copy).  Provide the vendor with the requisition number issued by the Environmental Office.
5	Generating Unit or Activity	Copy and retain all documents for Waste Disposal Records File.

Task Number	Performed By	Task
6	Contractor	Will Prepare Hazardous Waste Manifest, LDR, and Hazardous Waste Protocol Sheets before waste pick-up. In addition, package and label the waste for transportation and remove it from the site. (Figure 6-2).
7	Generating Unit or Activity	Review Hazardous Waste Manifest, LDR, and Hazardous Waste Protocol Sheets prepared by contractor to ensure that all waste to be picked up is listed on the manifest. Correct any mistakes.
8	Generating Unit or Activity	Sign the manifest. Retain generator copy and mail one copy to the generator state and one copy to the disposer state as indicated on the manifest within 5 days.
9	Generating Unit or Activity	Provide needed placards if the contractor does not have them (most transporters have the placards).
10	Generating Unit or Activity	Retain a copy of all paperwork: the manifest, Hazardous Waste Protocol Sheet(s), Lab Analyses, and LDRs. Maintain all waste records indefinitely.
11	TSDF	Upon receiving the waste, return a signed copy of the manifest to the generator as a receipt showing that the TSDF received the waste.
12	Generating Unit or Activity	Complete <b>both</b> Hazardous and Non-hazardous Environmental Waste Registers and attach PHOTOCOPIES of the transportation and disposal documentation to each register. Send these to the State HWM on the 1 <sup>st</sup> of every month. If NO waste was disposed of during that calendar month <b>a NEGATIVE report is required.</b>
13	Generating Unit or Activity	Ensure that all disposal paperwork is filed in the Waste Disposal Records IAW Chapter 8. <b>These items are subject to inspection and must be kept readily available for a minimum of 3 years; however, it is recommended that they be kept on record for as long as possible.</b>
14	Generating Unit or Activity	If you do not receive the manifest within <b>35</b> days, call the disposal facility immediately. If you do not receive a final copy of the manifest within <b>45</b> days, you must file an exception report with the NYSDEC. This exception report needs to include a photocopy of the manifest and a letter describing efforts to obtain a copy of the manifest from the TSDF. Contact the HWM to ensure they know an exception report is to be filed. HWM will complete the exception report on your behalf.

Task Number	Performed By	Task
15	HWM	Record all waste activity generated for each facility. Complete required reports for NYSDEC and National Guard Bureau (NGB) regarding waste activity at each facility. Track generator status, waste types, and potential P2 initiatives.

### **Uniform Hazardous Waste Manifests**

The Uniform Hazardous Waste Manifest has been standardized by the EPA. The content and appearance are consistent with DOT HM regulations. Manifests will be assigned unique document numbers that are used to meet the cradle-to-grave tracking requirements for containers of HW. An example of the Uniform Hazardous Waste Manifest is provided in Figure 6-2.

### **Non-Hazardous Waste Manifest**

The non-hazardous waste manifest can be used as a shipping paper for Universal and non-hazardous wastes. The content and appearance are consistent with DOT HM regulations and are similar to the Uniform Hazardous Waste Manifest. However, the EPA has not standardized this document. As per the HW Manifest, unique document numbers are typically assigned, and can be used track shipments of non-hazardous waste. An example of a Non-Hazardous Waste Manifest is included as Figure 6-3.



**Figure 6-2: Uniform Hazardous Waste Manifest**

Please print or type. Form Approved, OMB No. 2050-0039

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
5. Generator's Name and Mailing Address		Generator's Site Address (if different than mailing address)			
Generator's Phone:					
6. Transporter 1 Company Name		U.S. EPA ID Number			
7. Transporter 2 Company Name		U.S. EPA ID Number			
8. Designated Facility Name and Site Address		U.S. EPA ID Number			
Facility's Phone:					
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		No. Type			
1					
2					
3					
4					
14. Special Handling Instructions and Additional Information					
15. <b>GENERATOR'S/OFFEROR'S CERTIFICATION:</b> I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.22(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name		Signature		Month	Day
				Year	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____					
17. Transporter Acknowledgment of Receipt of Materials					
Transporter 1 Printed/Typed Name		Signature		Month	Day
				Year	
Transporter 2 Printed/Typed Name		Signature		Month	Day
				Year	
18. Discrepancy					
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____					
Facility's Phone: _____					
18c. Signature of Alternate Facility (or Generator)				Month	Day
				Year	
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1.	2.	3.	4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name		Signature		Month	Day
				Year	

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

Figure 6-3: Non-Hazardous Waste Manifest

**NON-HAZARDOUS WASTE MANIFEST**

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>RCRA NON-HAZARDOUS WASTE</b>	<b>NON-HAZARDOUS WASTE MANIFEST</b>	1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of	
	3. Generator's Name and Mailing Address				
	4. Generator's Phone ( )				
	5. Transporter 1 Company Name	6. US EPA ID Number	A. Transporter 1 Phone		
	7. Transporter 2 Company Name	8. US EPA ID Number	B. State Transporter's ID		
	9. Designated Facility Name and Site Address	10. US EPA ID Number	C. Transporter 2 Phone		
			D. State Facility's ID		
			E. Facility's Phone		
	11. WASTE DESCRIPTION		Containers No. Type	13. Total Quantity	14. Unit Wt./Vol.
	a.				
b.					
c.					
d.					
F. Additional Descriptions for Materials Listed Above		G. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information					
<b>16. GENERATOR'S CERTIFICATION:</b> I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.					
Printed/Typed Name		Signature	Date Month Day Year		
<b>TRANSPORTER</b>					
17. Transporter 1 Acknowledgment of Receipt of Materials					
Printed/Typed Name		Signature	Date Month Day Year		
18. Transporter 2 Acknowledgment of Receipt of Materials					
Printed/Typed Name		Signature	Date Month Day Year		
<b>FACILITY</b>					
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.					
Printed/Typed Name		Signature	Date Month Day Year		

CF14 Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800) 621-5808

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Rev. 10/93

## Self-transporting Hazardous Materials and Waste

### Hazardous Wastes

NYARNG personnel are allowed to self-transport waste from one location to another **within** the same fence line. However, NYARNG personnel are **NOT AUTHORIZED TO TRANSPORT HAZARDOUS WASTE ON PUBLIC HIGHWAYS**. The waste program has been set up so HW is picked-up directly from each facility only by vendors that are properly licensed to transport Hazardous Waste. Please refer to Table 6-1, Hazardous Waste Disposal Procedures, for turn-in and transportation information.

***Note:** Weapons cleaning patches and rags may be self-transported by units to their supporting maintenance shop. This is the only exception to the No Waste Transportation rule.*

Units stationed at stand-alone armories may self-transport used weapons cleaning patches to their supporting FMSs or CSMSs. According to an October 15, 1997 letter from the NYSDEC, NYARNG does not need a HW manifest when self-transporting weapons patches. As a BMP, use a Non-Hazardous Waste Manifest to document shipments of used weapons cleaning materials. See [Form 6-4](#) for a copy of a Non-Hazardous Waste Manifest.

### Hazardous Materials

Most chemical products used by the NYARNG are regulated as DOT HMs. Only personnel who are trained DOT HM certifiers can sign the necessary paperwork to offer HMs for shipment over public highways.

When packaging HMs, all relevant sections of 49 CFR HM transportation regulations must be followed. Prior to shipment, personnel that prepare or offer HM for shipment must verify the following:

- The product is a HM.
- The material(s) are properly packaged in their original packaging or in a comparable DOT-rated container.
- The container(s) are properly marked with the proper shipping name, hazard class/division label, UN/NA identification number, and packaging group number.
- The container(s) are properly labeled with a hazardous class division label and any additional subsidiary or handling labels.
- Shipping papers are prepared and certified (signed) by a trained DOT HazMat certifier, and emergency information is available
- The transport vehicle is inspected for mechanical problems and properly placarded, if applicable.

***ATTENTION!***

*It is against NYARNG policy to transport any product regulated as a HM in a privately-owned vehicle.*

When transporting HMs across public highways, NYARNG must comply with DOT and Army regulations, including the following as applicable:

- Using shipping papers
- Container selection (DOT certified)
- Container Markings
- Container Labeling
- Placarding the vehicles (if necessary)

Call the Transportation Office at (518) 786-4760 if you have a DOT HM that must be transported to another NYARNG unit or facility. They will advise you of all requirements and appropriate paperwork specific for the HM to be transported.

**Forms and Attachments**

This section contains the following forms:

- Hazardous Waste Manifest Register
- Non-Hazardous Environmental Waste Register
- DA Form 2765-1

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DA Form 2765- Hazardous Material and Waste Turn-in

DA FORM 2765-1, APR 1976

DOC IDENT	ROUT IDENT	M	FSC	FIN	ADD	UNIT OF ISSUE	QUANTITY	SVC	REQUISITIONER	DATE	SERIAL	DEMAND	SVC	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	PRI	REQ DEL DATE	ADV STAT
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### Preparation of DA Form 2765-1 for Hazardous Material and Waste Turn-in

DA FORM 2765-1, APR 78	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
SEND TO:	Receiving Facility Name & EPA ID No.										REQUEST IS FROM:						
A	Shop Name and EPA ID No.										STOCK NUMBER						
B	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
C	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
D	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
E	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
F	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
G	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
H	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
I	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
J	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
K	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
L	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
M	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
N	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
O	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
P	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
Q	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
R	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
S	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
T	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
U	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
V	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
W	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
X	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
Y	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT
Z	DOC IDENT	ROUT IDENT	FSC	NIIN	ADD	UNIT	QUANTITY	REQ	ISSUES	DATE	SERIAL	SUPPLEMENTARY ADDRESS	FUND	DISTRIB	PROJECT	REQ DEL DATE	ADV STAT

A DA Form 2765-1 must be prepared by each shop or activity for each type of HW and HM turned in. Alternatively a spreadsheet can be used to turn-in multiple waste items (instead of a separate Form 2765-1 for each item). If using a spreadsheet, include fields for all valid blocks on the Form 2765-1. Instructions by block number and example are as follows:

1. Block A: Enter the receiving facility and EPA ID number (if known) for transporting HW/HM to a supporting facility.
2. Block B: Enter generating facility name and EPA ID number.
3. Blocks 4-8: Enter federal stock number, unit of issue, and quantity of waste (Lbs), IAW DA PAM 710-2-1.
4. Blocks 9-12: Enter the document number IAW DA PAM 710-2-1.
5. Block O: Enter the proper item description for the waste from the SDS.
6. Block P: Enter "Turn-in as Hazardous Waste or Material" and indicate any special information known about the waste, for example: "Contains motor vehicle gasoline (MOGAS) with approximately 5% water," or "Paint thinner containing approximately 20% paint solids."

# Chapter 7 Solid Waste/P2 Management

## Introduction

### NYARNG Solid Waste Management and Pollution Prevention Programs

The New York Army National Guard (NYARNG) is committed to the proper management of solid waste. This chapter provides an outline of policies and procedures used by NYARNG to comply with Department of Defense (DoD) and U. S. Army directives with regard to solid waste diversion goals, along with Solid Waste Management and Pollution Prevention (P2) regulations, including:

- Army Directive 2014-02, Net Zero Installation Policy, dated 28 Jan 2014
- *Executive Order 13148 “Greening the Government Through Leadership in Environmental Management”* dated 26 April 2000
- NYS Executive Order No. 4. “*Establishing a State Green Procurement and Agency Sustainability Program*” dated April 24, 2008

Copies of all directive and policy letters referenced above are available from on-line sources or by contacting the NYARNG HW Manager.

### Federal and State Requirements

*Army Directive 2014-02* requires army installations to implement Net Zero policies and programs, which are to include the following:

- Reduction in overall energy use
- Reduction in water use
- Reduction of solid waste disposed of into landfills

NYS *Executive Order No. 4* requires each State Agency to develop and implement a Sustainability and Environmental Program which includes but is not limited to:

- The reduction or elimination of the use and generation of toxic substances, pollution and waste;
- The reduction, reuse, recycling and composting of solid waste;
- Increasing energy efficiency;
- Increasing the use of renewable energy sources;
- Conserving water and natural resources; and
- Maximize the use of environmentally preferable or “green” commodities, services and technology.

### Goals and Objectives

- Reduce waste volume and disposal costs.
- Increase the amount of recyclable materials collected.
- Increase the purchasing of products that contain recycled raw materials.
- Eliminating the use of toxic substances.

- Establish recycling programs for new wastes whenever possible, especially for bulky waste such as Construction and Demolition (C&D) waste.

## Responsibilities and Implementation

Responsibilities and Implementation of the Solid Waste Management Program include all DMNA employees, OIC& C's, Superintendents, District Maintenance Supervisors (DMS's), FMS Shop Chiefs, Army Aviation and Air Guard Commanders.

## What Can We Do to Make a Difference? Buy Recycled!

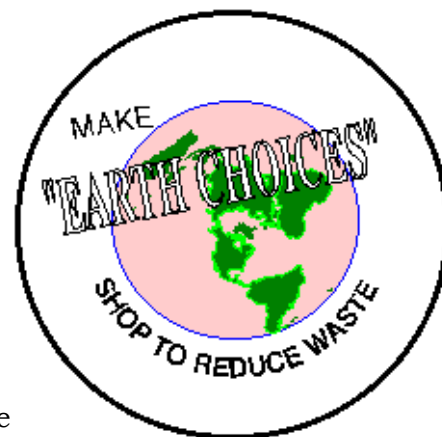
As most of you are probably aware, recycling activity has made tremendous strides in the last few years. In fact, every community in New York State is now required to have a recycling program in place. Changes need to be made in the way we conduct business in order to protect the environment and conserve natural resources.

However, to ensure that the materials that we separate for recycling actually get recycled-and to help pay for the recycling process-we must find ways to *make sure* that there is a *continuing demand for products made with recycled materials*. The easiest way to sustain such demand is to simply buy recycled products whenever they can. "Close the recycling loop" and BUY RECYCLED.

## What Products Are Made From Recycled Materials?

More and more products and packaging are being produced with recycled content. The following are just a few such items that you should look for prior to procurement:

- **Purchase 100% post-consumer recycled content paper whenever possible!**
- Paper napkins, paper towels, and toilet tissue (shall be process chlorine free to the extent practicable)
- Copy and envelopes paperboard packaging
- Plastic and paper bags.
- Glass containers.
- Aluminum and steel containers.



## Procurement

Utilize the established NYS and Federal Procurement lists for the procurement of commodities, services and technologies (unless the head of DMNA determines it is not required). These lists will identify the recycled content information on the products that you consider buying. Be sure to check the State and Federal Procurement Websites below for listings.

## State Procurement

See OGS Website: <http://www.ogs.state.ny.us/purchase/RR-Products.asp>

## Federal Procurement

See GSA Website: <http://www.gsa.gov>

## Recycled Product Procurement

Recycled product procurement should include, but not be limited to:

- Office supplies - file folders, dividers, envelopes, printer ribbons, pencils, computer disks, laser toner cartridges, etc.
- General paper - computer, letterhead, bond, fax, memo, Xerox, offset, carbonless paper, post-it notes, adding machine rolls, business card stock, printing paper, etc.
- Paper products - paper towels, napkins, toilet paper, tissues, etc.
- Plastic products - plastic bags, plastic lumber, outdoor equipment, etc.
- Remanufactured office equipment
- Reused construction material
- Motor oil
- Retread tires

## The Difference Between “Pre-Consumer” and “Post-Consumer” Materials

Many products also list information on the percentages of pre-consumer and post-consumer recycled content. To define those terms simply:

- **“Post-consumer materials”** include the materials from products that you buy, use and then separate for recycling.
- **“Pre-consumer materials”** are materials and by-products or scrap from industry that have not yet reached a consumer or business for their use. These materials are reused within the same manufacturing process.

***Note:** To make the most of your recycling efforts, look for products with a high post-consumer recycled content.*

## Establish a Recycling Program at Your Facility

You should establish a comprehensive recycling program at your facility. **Facilities are required to comply with the local recycling law or ordinance mandated in your municipality.** In addition to materials required to be recycled in the municipality in which you are located, you should expand your program to include other recyclables where ever possible. A comprehensive waste reduction, reuse, recycling and composting program will not only reduce your waste disposal costs but is *required by Executive Order No. 4 and 142.*

The purpose of this chapter is to provide you with some basic information on programs for waste reduction, reuse, recycling and composting along with information on buying recycled products and packaging for your facility! See the Solid Waste Protocol Sheets (SWPS) for step by step guidance on collection of specific solid waste items for general disposal or recycling.

The facility supervisor is responsible for the oversight and management of solid waste to include waste reduction, reuse, recycling and composting. Purchasing agents should be responsible for the purchasing of recycled materials.

## **Paper Recycling**

Set up an office paper recycling program at your facility. In addition to office paper, there are other types of paper you should recover for recycling. These include: newspaper, corrugated cardboard, hard-covered books, glued reports, magazines and glossy paper, and paperboard.

## **Common Recyclables**

Other recyclables are required by your local municipality's recycling laws. Check with your local recycling coordinator to find out what is required in your municipality. Some of the commonly collected recyclables include:

- **Plastic Containers**
  - Number 1 - PET
  - Number 2 – HDPE
- **Glass Bottles**
  - All colors
- **Metal Cans**

## **Reuse**

Your facility should maintain a year round office materials exchange location. The following office supplies are suggested to be reused whenever possible:

- Computer disks
- 3-ring binders
- File folders
- Binder clips
- Paper clips
- Comb binders
- Pocket folders
- Manila folders (if in good condition)
- Rubber bands
- Plastic pocket folders
- Plastic paper clips
- Plastic “sign here” tabs

In addition, your agency should:

- Support an office furniture/equipment reuse and sales program.
- Promote the use of reusable water bottles and/or coffee mugs to staff.
- Encourage staff to reuse dishes and silverware while at the office.
- Purchase reusable items instead of disposables.
- Require the use of reusable envelopes for inter-agency mail.
- Purchase remanufactured office equipment.
- Promote the use of rechargeable batteries.
- Require deliveries on reusable pallets.

## **Waste Reduction**

The following are waste reduction measures that should be promoted throughout your facility:

- Buy and use only what you need.
- Require double-sided copies for all Divisions/Units.
- Require duplex units on all printers.
- E-mail/scan rather than mail or fax.
- Require contractors submit double-sided copies and only the needed number of copies of reports and plans for review.
- Copies of memos, letters and subscriptions should be circulated instead of distributing individual copies.
- Circulate one bcc copy of a document within a Unit rather than making multiple copies of it.
- Mailing lists are periodically reviewed. Duplicates and individuals no longer wanting publications should be removed.
- Use two-way mailers (envelopes that can be reused when a return is requested.)
- Develop centralized data bases.
- Use “Post-its” or stamps for faxing instead of an extra page.
- Reduce forms - number and size if possible.
- Use scrap one-sided paper for notes, phone messages, drafts, etc.
- Post publications on your web page and encourage the public to download and view documents there.
- Business cards should be printed (on recycled paper) on an as needed basis. Your intra web page could provide the format and staff would copy and add the pertinent information as needed.
- Computerized time cards.



## **Waste Disposal**

See the Solid Waste Protocol Sheets (SWPS) at the end of this chapter that provide step-by-step procedures for the disposal of General Refuse and the segregation and recycling of certain solid waste items in accordance with State of NY recycling regulations.

## **Record Keeping and Reporting**

Each facility will utilize the “Monthly Solid Waste Report Form” to report the waste generated at their facility. This record is to be maintained for three (3) years.

***Note:** The facility Supervisor will be responsible for implementing the recycling program at their facility to include record keeping and reporting.*

Each of the District Maintenance Supervisors (DMS’s) will gather the data and consolidate the report for their “facilities” in their district on a quarterly basis. “Facility” is defined as the Armory, FMS, AASF and CSMS. The Director of Camp Smith, the plant superintendent of the Latham Complex and Air Base Commanders are responsible to report individually for all activities on their installation.

The reports shall be forwarded to MNFE-EC, ATTN: Environmental Specialist on a quarterly basis. The **suspense dates** for the quarterly reporting are as follows: **April 1st** (Jan-March), **July 1st** (April-June), **October 1st** (July-Sept), and **January 1st** (Oct-Dec). MNFE-EC will consolidate the reports for the sustainability coordinator at the agency level for their report to NYS DEC and the National Guard Bureau (NGB) as required.

## **Forms and Attachments**

- Monthly Solid Waste Report Form
- Table 7-1: Solid Waste Conversion Factors for Solid Waste Reporting Form
- Table 7-2: Solid Waste Protocol Sheet Index

Monthly Solid Waste Report Form

**FACILITY:**

**YEAR:**



<b>RECYCLED (Diverted)</b>	<b>JAN</b>	<b>FEB</b>	<b>MARCH</b>	<b>APRIL</b>	<b>MAY</b>	<b>JUNE</b>	<b>JULY</b>	<b>AUG</b>	<b>SEP</b>	<b>OCT</b>	<b>NOV</b>	<b>DEC</b>	<b>CY TOTAL (Tons)</b>
<b>Solid Waste (tons)</b>													
<b>MATERIAL:</b>													
White Paper ( <i>copy paper</i> )													
Mixed Paper ( <i>magazines, junk mail</i> )													
Newspaper													
Corrugated													
Returnable Containers													
Glass													
Plastic													
Metal													
C&D Debris ( <i>recycled</i> )													
Batteries ( <i>lead acid &amp; household</i> )													
Tires													
Motor Oil													
Yard Waste													
Office Equipment ( <i>reused or recycled</i> )													
OTHERS:													
<b>TOTALS (Tons)</b>													

Monthly Solid Waste Report Form (Recycling, Disposal, Reuse, Procurement)

RECYCLING PROCEEDS EARNED \$\$	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC	CY TOTAL \$'s
MATERIAL: <i>(Please list)</i>													
<b>Total Monthly \$ =</b>													
<b>DISPOSAL</b>	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	CY TOTAL (Tons)
<b>MATERIAL:</b>													
Refuse/garbage													
C&D Debris <i>(disposed)</i>													
OTHERS:													
<b>TOTAL TONS DISPOSED =</b>													
<b>TOTAL COST =</b> <i>(whole dollars \$)</i>													

Monthly Solid Waste Report Form (Recycling, Disposal, Reuse, Procurement)

Procurement" (\$ dollars spent)	JAN	FEB	MARCH	APRIL	MAY	JUNE	JULY	AUG	SEPT	OCT	NOV	DEC	(Dollars)
Paper ( <i>bond, copy, computer, business cards, fax, folders, etc.</i> )													
Tissue Paper ( <i>napkins, towels, facial, toilet tissue, etc.</i> )													
Remanufactured Office Equipment/computers													
Laser Toner Cartridges													
Plastic Materials ( <i>bags, lumber, barriers, etc.</i> )													
Reused Construction Materials													
Motor Oil													
Retread Tires													
Remanufactured Auto Parts													
OTHERS: ( <i>be specific</i> )													
<b>TOTAL DOLLARS =</b>													



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**Table 7-1: Solid Waste Conversion Factors**

<b>Office Paper:</b>		1 cubic yard = 500 lbs
<b>Newspaper:</b>		1 cubic yard = 600 lbs
<b>Corrugated Containers:</b>		1 cubic yard = 100 lbs (flattened) 1 cubic yard = 300 lbs (compacted)
<b>Magazines/Mixed Papers:</b>		1 cubic yard = 700 lbs
<b>Glass:</b>		1 cubic yard = 600 lbs (whole/unbroken) 1 - 55 gallon drum = 175 lbs (whole/unbroken) 1 cubic yard = 1000 lbs (manually broken) 1 - 55 gallon drum = 300 lbs (manually broken) 1 cubic yard = 2000 lbs (mechanically broken) 1 - 55 gallon drum = 550 lbs (mechanically broken)
<b>Ferrous Cans:</b>		1 cubic yard = 150 lbs (whole/not flattened) 1 cubic yard = 850 lbs (flattened)
<b>Aluminum Cans:</b>		1 cubic yard = 74 lbs (whole/not flattened) 1 cubic yard = 250 lbs (flattened)
<b>Returnable Containers</b>		27 - 12 oz. aluminum cans = 1 pound 8 - 2 liter PET bottles = 1 pound 2.25 - 12 oz. glass bottles = 1 pound
<b>Plastics:</b>	PET:	1 cubic yard = 30 lbs (whole/not flattened) 1 cubic yard = 75 lbs (flattened)
	HDPE:	1 cubic yard = 25 lbs (whole/not flattened) 1 cubic yard = 50 lbs (flattened)
	Mixed Resins:	1 cubic yard = 40 lbs (whole/not flattened)
<b>Construction and Demolition Debris:</b>		
	Wood:	1 cubic yard = 300 lbs
	Asphalt:	1 cubic yard = 1500 lbs
	Concrete:	1 cubic yard = 2000 lbs
	Mixed C&D:	1 cubic yard = 500
<b>Tires:</b>		1 passenger car tire = 20 lbs 1 truck tire = 100 lbs
<b>Batteries:</b>	Dry cell (mixed):	1 - 55 gallon drum = 650 lbs
	Lead-Acid:	1 auto battery = 35 lbs
<b>Used Motor Oil:</b>	1 gallon = 7.3 lbs	
<b>Organic Materials:</b>	Leaves:	1 cubic yard = 250 lbs (not compacted) 1 cubic yard = 450 lbs (compacted)
	Wood Chips:	1 cubic yard = 400 lbs (not compacted)
	Grass Clippings:	1 cubic yard = 400 lbs (not compacted)
<b>Mixed Yard Wastes:</b>		1 cubic yard = 400 lbs (not compacted)

**Table 7-2: Solid Waste Protocol Sheet (SWPS) Index**

SWPS #	WASTE TYPE	PAGE #
01	GENERAL DEBRIS/TRASH (NON-HAZARDOUS SOLID WASTE)	7-13
02	GENERAL WORKPLACE RECYCLABLES (RECYCLED WASTE)	7-15
03	SCRAP METAL (RECYCLED WASTE)	7-18
04	TIRES, USED (RECYCLED WASTE)	7-20

# GENERAL DEBRIS/TRASH


(Non-Hazardous Solid Waste)

01

**GENERAL REQUIREMENTS**

- **Contact the trash collection vendor to find out what waste items are to be segregated from the general debris/trash.** These items typically include Hazardous Wastes and items that are to be segregated for recycling (See list in Step 3 below).
- **Each facility should have ONE final end collection point (dumpster location) for General Debris.**
- The POC for this guidance is the NYARNG HWM at (518) 786-4347.

**Step 1 | Approved Containers**

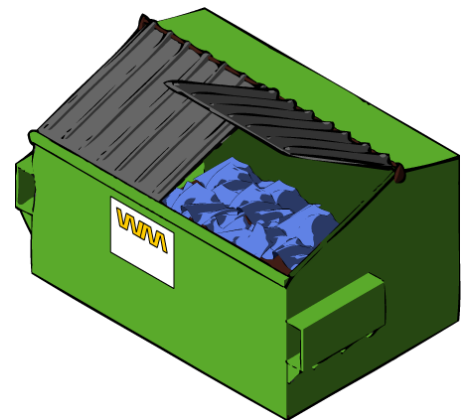
 **Obtain waste baskets/trash cans via local purchase as appropriate to suit needs of the facility.** Some facilities prefer a 55 gal covered plastic garbage cans on wheels, others prefer smaller containers.

- Size and number of container(s) will depend on the amount of trash generated at your facility each week as well as the number of collection locations.
- **Other Considerations:**
  - Use garbage bags or liners inside each waste basket or trash can.
  - When emptying waste baskets/trash cans, tie bags closed before placing in dumpster. Replace liner each time a waste basket/trash can is emptied.
- Maintain waste containers;
  - Ensure trash cans/waste baskets are clean and serviceable condition by inspecting them periodically.
  - Containers in poor condition should be removed from service and replaced.
- All waste dumpsters **MUST** remain closed except when adding trash.
- Stop filling dumpster(s) before they are completely full. Lids must stay closed.

**Step 2 | Mark the Containers**

Recommended Markings:  
**Post Signs to ID Waste Items to be Collected**

Signage on dumpsters will typically identify waste items that can't be placed inside





<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Education is a key element in any successful waste reduction program.             <ul style="list-style-type: none"> <li>○ Take the time to brief staff on the importance of proper trash management and how waste items are currently collected for disposal at the facility.</li> <li>○ Brief staff when new waste items are identified that must not be disposed of as general debris/trash.</li> </ul> </li> <li>• The following list describes items that are NOT allowed in a normal trash/general debris dumpster. These items are NOT accepted for disposal at landfills and must NOT be placed into a trash dumpster at any NYARNG facility.             <ul style="list-style-type: none"> <li>○ Hazardous Wastes identified in this plan (See WPSs in Chapter 5)</li> <li>○ Non-Hazardous Waste and Recyclable Materials identified in this plan (See WPSs in Chapter 5 and SWPSs in Chapter 7)</li> <li>○ Asbestos Containing Waste</li> <li>○ Polychlorinated Biphenyls (PCBs)</li> <li>○ Liquids</li> <li>○ Water Based Paint/Adhesives with free-flowing liquids (paint cans should be dry with lids off)</li> <li>○ Whole Waste Tires</li> <li>○ Dry Cell Batteries containing Lithium, Cadmium, or Mercury</li> <li>○ Wet Cell Batteries</li> <li>○ Medical or Infectious Waste (before or after incineration)</li> <li>○ Flammable or Volatile Substances</li> <li>○ Motor Oil (new or used)</li> <li>○ Automobile Gas Tanks</li> <li>○ Dead Animals</li> <li>○ Fluorescent Bulbs</li> <li>○ Explosives</li> <li>○ Appliances Containing Refrigerant (i.e. Freon or other CFC compounds)</li> <li>○ Compressor motors from appliances (regardless of condition)</li> <li>○ Radioactive Materials</li> <li>○ Incinerator Ash or Residue</li> <li>○ Burn Barrels</li> <li>○ Compressed Gas Cylinders</li> <li>○ Electrical Transformers, Capacitors and Dielectric Fluids</li> <li>○ Petroleum-contaminated soils (from spills)</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Collection or Drop-off Procedures</b>
<ul style="list-style-type: none"> <li>• <b>Collection</b> – Coordinate collection of waste materials with staff.</li> <li>• Create a regular schedule and determine who will gather up trash from waste baskets/trash cans and place into larger collection containers (dumpster) in preparation for pickup.             <ul style="list-style-type: none"> <li>• This task is performed by unit staff, janitorial crew or a combination of both.</li> </ul> </li> <li>○ <b>Drop-off recycling</b> – If your staff is using a local drop-off collection center for recycling, additional space may needed at the facility to store recyclables in an organized fashion, until enough are on hand for a trip to the collection center.</li> </ul>	

**Step 5 | Tracking Requirements**

- Keep track of the type and amount of solid waste you accumulate at your facility each month (See Waste Tracking Form at end of Chapter 7).
  - Estimate the weight of the waste material using the Solid Waste Conversion factor sheet (See Table 7-1), use a scale (if available), or obtain weight receipts.
  - Record quantities on form provided at the end of this chapter.

# GENERAL WORKPLACE RECYCLABLES


(Recycled Waste)

02




## GENERAL REQUIREMENTS

- **Contact the local recycling authority (municipality or county) or the trash collection vendor to find out what recyclable items are to be segregated from the general debris/trash.** These items typically include used food and beverage containers and misc. paper products (office paper, newspaper and cardboard). See list in Step 3 below.
- **Each facility should have ONE end collection point (dumpster location or accumulation area) for General Workplace Recyclables.**
- The POC for this guidance is the NYARNG HWM at (518) 786-4347.

## Step 1 | Approved Containers

-  **Obtain recycling bins of various sizes from the recycling vendor or via local purchase as appropriate to suit needs of the facility.** Some facilities prefer a 55 gal covered plastic garbage cans on wheels, others prefer smaller containers. Recycling stickers can be obtained from the HW Manager.
- Size and number of container(s) will depend on the amount of recyclables generated at your facility each week as well as the number of collection locations.
  - **Other Considerations:**
    - **Small bins** – Provide recycling containers or use an empty box to collect paper for recycling at each work stations. Also position a bin/box next to machines that generate recyclable paper such as printers, copiers and fax machines.
    - **Central bins** – Locate larger recycling bins in copy rooms or break rooms.
    - Maintain collection containers;
    - Ensure recycling bins are in clean and serviceable condition by inspecting them periodically.
    - Containers in poor condition should be removed from service and replaced.
    - All recycling dumpsters **MUST** remain closed except when adding recyclables.
  - Stop filling dumpster(s) before they are completely full. Lids must stay closed.

## Step 2 | Mark the Containers




<p>Recommended Markings: <b>Post Signs to ID items to be collected for recycling</b></p> <p>Signage on dumpsters will typically identify waste items that can or can't be placed inside.</p>	 	
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<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Education is a key element in any successful workplace recycling program. <ul style="list-style-type: none"> <li>○ Take the time to brief staff on the importance of workplace recycling and which/how items are segregated for recycling at the facility.</li> <li>○ Brief staff when new waste items are identified that must be segregated from general debris/trash for recycling.</li> </ul> </li> <li>• The following list describes items that are not accepted for disposal at landfills and must be segregated for recycling IAW State of NY regulations; <ul style="list-style-type: none"> <li>○ Food and Beverage Containers made of the following materials; <ul style="list-style-type: none"> <li>➤ Glass</li> <li>➤ Metal (steel or aluminum)</li> <li>➤ Plastic (Marked #1 or #2)</li> </ul> </li> <li>○ Paper products, including the following; <ul style="list-style-type: none"> <li>➤ Office Paper</li> <li>➤ Newspaper</li> <li>➤ Corrugated Cardboard</li> </ul> </li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Collection or Drop-off Procedures</b>
<ul style="list-style-type: none"> <li>• <b>Collection</b> – Coordinate collection of waste materials with staff.</li> <li>• Create a regular schedule and determine who will gather up recyclables from collection bins and place into larger collection containers (dumpster) in preparation for pickup. <ul style="list-style-type: none"> <li>• This task is performed by unit staff, janitorial crew or a combination of both.</li> </ul> </li> <li>○ <b>Drop-off recycling</b> – If your staff is using a local drop-off collection center for recycling, designate a team/coordinator for this activity that will ensure recyclables are taken to the collection center on a routine basis. <ul style="list-style-type: none"> <li>• Additional space may needed at the facility to store recyclables in an organized fashion, until enough are on hand for a trip to the collection center.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Tracking Requirements</b>
<ul style="list-style-type: none"> <li>• Keep track of the type and amount of recyclable waste items recycled from the facility each month (See Waste Tracking Form at end of Chapter 7). <ul style="list-style-type: none"> <li>○ Estimate the weight of the recycled material using the Solid Waste Conversion factor sheet (See Table 7-1), use a scale (if available), or obtain weight receipts from recycling vendors.</li> <li>○ Record quantities on form provided at the end of this chapter.</li> </ul> </li> </ul>	

# SCRAP METAL

(Recycled Waste)

03


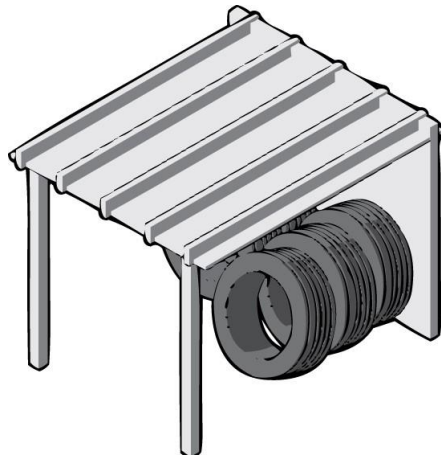
<b>GENERAL REQUIREMENTS</b>	
<ul style="list-style-type: none"> <li><b>Scrap metal items are to be segregated from the general debris/trash. Contact the scrap vendor to find out what items can or can't be accepted for recycling as scrap metal.</b></li> <li>Each facility that generates scrap metal should establish ONE end collection point (dumpster location or accumulation area) for this material.</li> <li><b>See WPS17; <u>Electronic Scrap</u> and WPS25; <u>Lead Scrap</u> for additional information on recycling/disposal requirements for these scrap items.</b> In general, electronic scrap and lead scrap items must be segregated (collected separately) from other scrap metal.</li> <li>Scrap metal containing metals with a high recycling market value, including precious (gold, silver) and non-precious metals (copper, brass, aluminum), should be collected separately from ferrous scrap metal.</li> <li>The POC for this guidance is the NYARNG HWM at (518) 786-4347.</li> </ul>	
<b>Step 1</b>	<b>Approved Containers</b>
	<p><b>Obtain collection bins of various sizes from the scrap metal vendor or via local purchase as appropriate to suit needs of the facility. Alternatively wood pallets can be used for storage of scrap metal while it is being accumulated on site.</b></p> <ul style="list-style-type: none"> <li>Size and number of container(s)/pallets will depend on the amount of scrap metal generated at the facility each week/month.</li> <li><b>Other Considerations:</b> <ul style="list-style-type: none"> <li>As a Best Management Practice (BMP), scrap metal being accumulated on-site for recycling should be stored under cover of a roof or tarp that will prevent contact with rainwater or storm water runoff.</li> <li>Ensure metal bins or pallets used to store scrap metal are in clean and serviceable condition by inspecting them periodically.</li> <li>Containers in poor condition should be removed from service and replaced.</li> <li>All scrap metal dumpsters MUST remain closed except when adding scrap.</li> </ul> </li> <li>Stop filling dumpster(s) before they are completely full. Lids must stay closed.</li> </ul>
<b>Step 2</b>	<b>Mark the Containers</b>
<p>Recommended Markings: <b>Scrap Metal Only</b></p> <p>Signage on dumpsters will typically identify scrap items that can or can't be placed inside.</p>	<div style="display: flex; align-items: center; justify-content: space-around;">   </div>

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Education is a key element in any successful scrap metal recycling program. <ul style="list-style-type: none"> <li>○ Take the time to brief staff on the importance of scrap metal recycling and which/how scrap items are segregated for recycling at the facility.</li> <li>○ Brief staff when new scrap items (such as E-scrap and lead scrap) are identified that must be segregated from other scrap metal for recycling.</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Pickup or Turn-in Procedures</b>
<ul style="list-style-type: none"> <li>• <b>Collection</b> – Coordinate turn-in of scrap metal with facility staff. <ul style="list-style-type: none"> <li>○ <b>On-site Pickups;</b> Create a regular schedule and appoint a team/coordinator to ensure scrap metal is contained/stored properly in preparation for pickups by scrap vendors.</li> <li>• <b>Turn-in;</b> as an alternative, facilities can turn-in their recyclable scrap metal through the USPFO or their supporting maintenance shop. These facilities should designate a team/coordinator that will ensure scrap metal is turned-in to the designated collection site on a routine basis.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Tracking Requirements</b>
<ul style="list-style-type: none"> <li>• Keep track of the type and amount of scrap metal recycled from the facility each month (See Waste Tracking Form at end of Chapter 7). <ul style="list-style-type: none"> <li>○ Estimate the weight of the scrap metal using the Solid Waste Conversion factor sheet (See Table 7-1), use a scale (if available), or obtain weight receipts from scrap vendors.</li> <li>○ Record quantities on form provided at the end of this chapter.</li> </ul> </li> </ul>	

# TIRES, UNSERVICEABLE

(Recycled Waste)

04

GENERAL REQUIREMENTS		
<ul style="list-style-type: none"> <li>• <b>Unserviceable tires are to be segregated from the general debris/trash.</b> <ul style="list-style-type: none"> <li>○ Each facility that generates unserviceable tires should establish ONE end collection point (accumulation area) for this material.</li> </ul> </li> <li>• The POC for this guidance is the NYARNG HWM at (518) 786-4347.</li> </ul>		
Step 1	Accumulation Area	
<div style="display: flex; align-items: flex-start;"> <div style="margin-right: 10px;">  </div> <div> <p><b>Select an area that is of appropriate size to collect the expected number of unserviceable tires. Area should be away from day to day traffic and should be a well-drained area not subject to flooding during heavy rain.</b></p> <ul style="list-style-type: none"> <li>• Unserviceable tires should not be accumulated/stored near heat sources or open flames.</li> <li>• There is no regulatory limit for the number of unserviceable tires that can be accumulated on site. However, as a Best Management Practice (BMP), it is recommended that no more than 150 tires be accumulated at one time before a turn-in to the USPFO is performed (See Step 4).                             <ul style="list-style-type: none"> <li>○ Facilities that serve as a drop-off point for unserviceable tires (USPFO) must limit their total number on site to no more than 1,000 tires. The State of NY DEC requires a permit to store more than this amount at a facility.</li> </ul> </li> <li>• <b>Other Considerations:</b> <ul style="list-style-type: none"> <li>○ As a BMP, unserviceable tires being accumulated on-site for recycling should be stored under cover of a roof or tarp or inside a trailer that will prevent contact with rainwater or storm water runoff. Storm water that collects in tires can create a breeding areas for mosquitoes and represents a public health risk.</li> <li>○ No containers are required for unserviceable tires.</li> </ul> </li> </ul> </div> </div>		
Step 2	Mark Directly on the Used Tire	
<p>Recommended Markings:</p> <p><b>Use Permanent Marker or Paint</b></p>	<h2 style="font-size: 24pt; font-weight: bold;">Unserviceable</h2>	

<b>Step 3</b>	<b>Quality Control (General Do and Don'ts)</b>
<ul style="list-style-type: none"> <li>• Education is a key element to a successful unserviceable tire recycling program. <ul style="list-style-type: none"> <li>◦ Take the time to brief staff on the importance of tire recycling and how unserviceable tires are segregated for recycling and protected from the elements at the facility.</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Waste Pickup or Turn-in Procedures</b>
<ul style="list-style-type: none"> <li>• <b>Collection</b> – Coordinate collection turn-in of unserviceable tires with facility staff. Create a regular schedule and appoint a team/coordinator to ensure unserviceable tires are contained/stored properly on site and turned in to the USPFO on a routine basis.</li> <li>• <b>Turn-in</b> – Unserviceable tires are controlled within the DoD as federally recoverable items. Utilize an Unserviceable Recoverable Item Form (Form U115-GS) when conducting a turn-in of unserviceable tires. <ul style="list-style-type: none"> <li>◦ Facilities can self-transport unserviceable tires in NYARNG vehicles when conducting a turn-in.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Tracking Requirements</b>
<ul style="list-style-type: none"> <li>• Keep track of the amount of unserviceable tires recycled from the facility (See Waste Tracking Form at end of Chapter 7). <ul style="list-style-type: none"> <li>◦ Estimate the weight of the unserviceable tires using the Solid Waste Conversion factor sheet (See Table 7-1), use a scale (if available), or obtain weight receipts from turn-ins.</li> <li>◦ Record quantities on form provided at the end of this chapter.</li> </ul> </li> </ul>	



# Chapter 8 Training, Inspections, and Record Keeping

This chapter gives information, instructions, and forms for required training, periodic internal inspections, and record keeping.

## Required Training

**Table 8-1. Training Regulatory Requirements**

Citation	Requirement
<b>AR 200-1 (10-1,d(2))</b>	Ensure all persons handling or managing HW are provided with appropriate training.
<b>40 CFR 262.34</b>	All personnel working at facilities operating as a Small Quantity Generator (SQG) of hazardous waste are thoroughly familiar with proper waste handling and emergency procedures.
<b>40 CFR 273.16</b>	Facilities that are regulated as Small Quantity Handlers (SQH) of universal waste must train employees on proper handling and emergency procedures appropriate for the wastes they are generating.
<b>49 CFR 172.704</b>	Employees receiving/handling HM or certifying/signing a hazardous waste manifest undergo general DOT Hazardous Materials awareness/familiarization training and function-specific training.
<b>29 CFR 1910.120 (q)(6)</b>	Employees who are expected to participate in HM cleanup receive the appropriate levels of training.
<b>DoD 4500.9-R</b>	Chapter 204, Section D Training, Paragraph 1(a): All personnel involved with the preparation and shipment of HM for commercial or surface military transportation receive training in accordance with 49 CFR 172.704 and DoD Component regulations. Chapter 204, Section D, Paragraph 1(a): Persons who are involved with the preparation and shipment of HM must receive training. Paragraph 1(b): Persons who certify HM on shipping papers must successfully complete DoD training. Paragraph 1(f): DoD drivers will receive training. Paragraph 1(h); alternative training for certification of hazardous waste shipments.

## FECO

The Facility Environmental Compliance Officer (FECO) must receive training upon receiving their assignment. FECOs must attend the initial Environmental Compliance Course or perform equivalent computer-based training at the next available opportunity upon receiving their assignment. The FECO should repeat training annually for continued updates as needed. The FECO course is offered online via

Environmental Compliance Resource Center via online training modules on the NYARNG Environmental Home Page located on GKO- link <https://gko.portal.ng.mil/states/NY/Dept's%20and%20Programs/Enviromental%20Compliance/SeitePages/Home.aspx>. **(This link is changing to GKN (Guard Knowledge Network) on Oct 1 2022. Unfortunately, the URL is NOT available now, we believe this page will be redirected from the previous one, but GKN cannot confirm right now, at the time of printing this management plan).** The training must describe proper handling and emergency procedures appropriate to the types of HW generated by the activity, as well as information on complying with Federal, state, local, and Army environmental regulations. There will be questions built into the presentation for better participant interaction and understanding. Upon completion of the course, a certificate of completion can be printed by the student and the student will be prompted to complete the electronic training roster for the completed course. This roster can be viewed by shop supervisors as well as the HW Manager. Training should address the following areas:

- Instruction on the contents, use, and implementation of this Plan
- Managing Hazardous Materials
- Regulations governing generation, storage, and transport of HW and UW
- Identifying and classifying HW and UW
- Establishing and maintaining HW accumulation sites
- Packaging and labeling containers of HW and UW
- Inspection procedures
- Recordkeeping
- Completing applicable forms
- Preventing and responding to spills using the Contingency Plan

## UECO

UECOs must perform initial UECO training via computer-based training modules at the first available opportunity following their appointment. In addition, the UECO will attend or perform future training as per Chain of Command. The UECO training is available via the GKO Environmental Compliance Resource Center on GKO (See above link under FEEO). It is recommended that each UECO also perform annual refreshers of the environmental training materials available on-line.

The training must describe proper handling and emergency procedures appropriate to the types of HW generated by the activity, as well as information on how to comply with federal, state, local, and Army environmental regulations.

Training should address the following areas:

- Instruction on the contents, use, and implementation of waste handling and management procedures described in this Plan
- Regulations governing generation, storage, and transport of HW
- Recordkeeping

- Completing applicable forms
- Preventing and responding to spills using the Contingency Plan

**Personnel**

Personnel who handle or manage HW and HMs must receive appropriate training based upon their job function (See Table 8-1). On the job training can be provided by trained FECO’s, UECO’s, Supervisors or Environmental Staff. The training shall include such general awareness and familiarization pertaining to safety, environmental and waste management issues.

Please refer to the Environmental Training Matrix Below and determine your role and frequency of training courses required.

**Environmental Compliance Training Matrix**

Training Matrix		Personnel & Position									
		Facility Env Officer (FECO)- at maint shops	Alternate FECO- at Maint shops	Unit Env Officer (UECO)- at Armories	Installation on scene coord- spills (IOSC)	Installation Response Team- (IRT)	Military Maint. shop Mech.	Maint Staff & Superintend	M-Day Soldiers (Unit members)	Petroleum Tank Operators	
Training course and Requirement	FECO Course	Annual	Annual								
	UECO Course			Annual							
	Hazardous Waste Manifest Certifier	Annual	Annual								
	Spill Response Training	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	Annual	
	General Environmental Awareness						Annual	Annual	Annual	Annual	
	Petroleum Bulk Storage Tank Mgt (AST/UST)	Required if have PBS tank	Required if have PBS tank					Required if have PBS tank		Required if have PBS tank	
	Universal Waste						Annual	Annual	Annual		
	SPCC Annual Awareness	Annually at SPCC sites	Annually at SPCC sites		Annually at SPCC sites	Annually at SPCC sites	Annually at SPCC sites	Annually at SPCC sites	Annually at SPCC sites	Annually at SPCC sites	
	Preparing for Inspections & Recordkeeping	Annual	Annual					Recommend		Annual	
	Oil Water Separator Mgt	Required if maintaining OWS	Required if maintaining OWS				Required if maintaining OWS	Required if maintaining OWS			
	Solid Waste Mgt(Recycling & Reporting)	Recommend	Recommend	Recommend				Annual			
	Storm Water Pollution Prevention	Annual	Annual	Annual			Recommend	Annual	Recommend	Annual	
	Mobility Fueling Operations	Annual	Annual	Annual	Annual	Annual	Annual		Annual		

*\* ATTENTION SUPERVISORS- It is the responsibility of each Supervisor to ensure the appropriate individuals attend the required training based upon their job function. Ensure training is completed documented!*

**CAUTION**

NYARNG personnel who handle or manage HW *must* fulfill training requirements before working in waste management.

**Note:** *It is the responsibility of each supervisor to ensure that the appropriate individuals attend required training based upon their job function. The NYARNG Environmental Office will provide the training*

*modules, the supervisor will ensure training is completed and documented as required.*

## **Inspections**

### **Regulatory Inspections**

All NYARNG activities are subject to internal inspections by the Environmental Office and external inspections by state and federal regulatory agencies. Local governments may also inspect for compliance with permits, local codes, or other regulations. If you receive a notice of an upcoming inspection or an inspector comes to your door, immediately notify the Environmental Office by telephone. Forward copies of all correspondence related to the inspection to the Environmental Office.

Be prepared for a regulatory inspection at all times. It is important to have all paperwork and records in a neat and orderly manner (refer to recordkeeping on page 8-6). Ask to see the inspector's ID. All state and Federal compliance officers must carry a photographic ID. **Supply only the information requested. It is not advisable to offer more than what the inspector asks to see.**

***Note:** Please remember this is not an appropriate time to discuss your facility's shortcomings or agency deficiencies.*

After the inspection is completed, ask the inspector to brief you on the outcome and any corrective actions suggested. If a representative of the Environmental Office is not on-site, contact them as soon as possible to notify them of the outcome. Facilities must work with the NYARNG Environmental Office to ensure corrective actions are completed and documented.

### **Waste Accumulation Inspections**

Federal and State Hazardous Waste Regulations require periodic inspection of areas where HW is accumulated or stored. At facilities that are regulated as a HW Small Quantity Generator (SQG), the HWSBs and SAAs must be inspected **weekly**. Areas where non-hazardous waste containers are accumulated or stored should also be inspected (at least monthly) as a BMP.

Use the Waste Accumulation and Storage Area Inspection Log (See Figure 8-1) to conduct and document weekly inspections of containers of hazardous waste in all HWSBs and SAAs.

As a BMP, use the Waste Accumulation and Storage Area Inspection Log at least monthly to conduct and document inspections of containers of non-hazardous waste in storage or accumulation mode. Circle the title on the form to indicate either a weekly HW inspection or a monthly non-hazardous waste inspection.

***Note:** Keep inspection records for three years with the facility environmental records.*

**Figure 8-1: Waste Accumulation and Storage Area Inspection Log**

**Waste Accumulation and Storage Area Inspection Log**

**Weekly – Hazardous Waste Accumulation Areas and Storage Buildings**  
**Monthly – Non-Hazardous Waste Accumulation Areas and Storage Buildings**

Name of Inspector: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Inspect the area where waste is accumulated and ensure the following:

- 1. Security/Communication**
  - a. Access is controlled and limited to authorized personnel.
  - b. "No Smoking" and "No Open Flame" signs are posted where flammable wastes are stored.
- 2. Container Storage**
  - a. Containers are in good condition
  - b. Tops of containers are free of equipment and debris.
  - c. All container lids, tops, and bungs are maintained closed and tightly sealed
  - d. Aisle space is a minimum of 36 inches
  - e. Containers are not stacked
  - f. All containers have visible markings (hazardous waste, universal waste, or non-hazardous waste)
  - g. Hazardous waste markings in HWSBs have the waste description and accumulation start date.
  - h. Hazardous waste markings in SAAs have a description of the waste material
  - i. No standing liquids are present in the secondary containment
  - j. The storage area is free of trash, debris, and spills
  - k. Containers are less than 90% full
  - l. The ASD on containers of HW are used to determine when a pickup is needed.
  - m. No HW containers have been stored for more than 180 days
- 3. Safety and Spill Control**
  - a. Emergency shower and eye wash are routinely tested
  - b. Fire extinguishers are in place and routinely tested
  - c. Personal protective equipment (especially eye, hand and clothing protection) is fully stocked and accessible
  - d. Spill kits are fully stocked and accessible.

HWSB/SAA	Deficiencies	Date and Nature of Corrective Action

Signature: \_\_\_\_\_

*\*NOTE: Retain this record for three (3) years.*

## Record Keeping

The following records (as they pertain to your facility operations) are required to be kept on file for a **minimum of three years** to meet regulatory requirements, however it is recommended that you keep these records on file for as long as possible.

Hazardous Waste Records include:

- A copy of this Plan
- Assignment letters for FECO and UECO appointments
- Job descriptions, including job title for each activity position related to HW management
- Names of employees filling each position and their requisite skill, education, other qualifications, and duties
- Written description introductory and continuing training required for personnel
- HM(s) chain of command and points of contact
- Manifest(s) for HW shipments, with attached LDR(s) and all other transportation and shipping documentation
- SDS(s) maintained in the Master Binder
- Laboratory analyses (as needed)
- Current Blanket Purchase Agreement information
- Hazardous Waste Manifest Register
- Non-Hazardous Environmental Waste Register
- Used Oil Shipping Documents
- Unit Turn-In Forms
- Spill Incident Reports
- Waste Accumulation and Storage Area Inspection Log
- Hazardous Waste Training Records (including training rosters)
- Solvent Consumption Records

***Note:** Personnel training records may accompany personnel transferred within the NYARNG.*

## FECO/UECO Hazardous Material/Hazardous Waste Management Self-Assessment Checklist

The checklist covers the main aspects of this plan. **This checklist is intended to be used by the FECO/UECO as a guide for conducting certain required tasks.** Refer to form at the end of this chapter titled: *FECO/UECO Hazardous Material/Hazardous Waste Management Self-Assessment Checklist*.

## **Forms and Attachments**

This section contains the following forms:

- Waste Accumulation and Storage Area Inspection Log
- FECO/UECO Hazardous Material/Hazardous Waste Management Self-Assessment Checklist
- Requirement to Maintain Solvent Consumption Records (Memo dated 8 February 2008)
- Solvent Consumption Tracking Form

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## Waste Accumulation and Storage Area Inspection Log

**Weekly** – Hazardous Waste Accumulation Areas and Storage Buildings  
**Monthly** – Non-Hazardous Waste Accumulation Areas and Storage Buildings

Name of Inspector: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Inspect the area where waste is accumulated and ensure the following:

- 1. Security/Communication**
  - a. Access is controlled and limited to authorized personnel.
  - b. “No Smoking” and “No Open Flame” signs are posted where flammable wastes are stored.
- 2. Container Storage**
  - a. Containers are in good condition
  - b. Tops of containers are free of equipment and debris.
  - c. All container lids, tops, and bungs are maintained closed and tightly sealed
  - d. Aisle space is a minimum of 36 inches
  - e. Containers are not stacked
  - f. All containers have visible markings (hazardous waste, universal waste, or non-hazardous waste)
  - g. Hazardous waste markings in HWSBs have the waste description and accumulation start date.
  - h. Hazardous waste markings in SAAs have a description of the waste material
  - i. No standing liquids are present in the secondary containment
  - j. The storage area is free of trash, debris, and spills
  - k. Containers are less than 90% full
  - l. The ASD on containers of HW are used to determine when a pickup is needed.
  - m. No HW containers have been stored for more than 180 days
- 3. Safety and Spill Control**
  - a. Emergency shower and eye wash are routinely tested
  - b. Fire extinguishers are in place and routinely tested
  - c. Personal protective equipment (especially eye, hand and clothing protection) is fully stocked and accessible
  - d. Spill kits are fully stocked and accessible.

HWSB/SAA	Deficiencies	Date and Nature of Corrective Action

Signature: \_\_\_\_\_

*\*NOTE: Retain this record for three (3) years.*

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## FECO/UECO Hazardous Material/Hazardous Waste Management Self-Assessment Checklist

Topic	Response	Date/Observation/ Corrective Action
<b>Setting Up Storage Areas- Hazardous Material Management</b>		
Are hazardous materials (HMs) properly stored and segregated?		
Is stock material maintained regularly?		
Are storage areas for HMs set up according to NYARNG HMWMP?		
Are routine hazardous materials rotated and is shelf-life checked regularly?		
Are safety data sheets (SDSs) checked and maintained as stock changes?		
Are annual chemical storage inventories conducted and copies forwarded to the Environmental Office upon request?		
<b>Setting Up Waste Accumulation Areas</b>		
Are waste Accumulation Areas (SAA) located at or near the process that generates the waste?		
Is the SAA under the control of the operator of the process that generates the waste?		
Are signs posted identifying the areas as a SAA?		
Are spill kits and fire extinguishers available for emergencies?		
Are containers compatible with material, properly labeled, and segregated as necessary?		
Is secondary containment provided for containers 55-gallons or greater?		
<b>Managing Hazardous Waste</b>		
Are proper containers selected for the type of waste?		
Are containers properly labeled and marked?		
Is the waste accumulation inventory log completed and attached to the container?		
Are Waste Protocol Sheets (WPSs) used?		
Is the HWSB properly maintained and the access controlled?		
Are HWSBs and SAAs inspected weekly and the inspection form completed?		

Topic	Response	Date/Observation/ Corrective Action
Are the HWSB and SAA weekly inspection forms maintained for three years?		
Are deficiencies noted in the weekly HWSB inspections corrected?		
<b>Turning in Hazardous Waste</b>		
Was vendor contacted and price quoted for waste pick-up and removal?		
Was a requisition number issued by the environmental office for waste shipment?		
Are all shipping papers reviewed, corrected if necessary, and signed when the vendor arrives for waste pick-up?		
Did you enter the waste shipment on the Hazardous Waste Manifest Register or the Non-Hazardous Environmental Waste Register?		
Did you mail the Hazardous Waste Manifest Register, the Non-Hazardous Environmental Waste Register, and copies of all shipping documents to the Environmental Office on the 1 <sup>st</sup> of every month?		
Did you collect Unit Waste Turn-In forms and file in the Hazardous Waste Record?		
Did you complete the waste shipment by receiving return copy of the manifest from the disposal facility?		
Are you maintaining records as long as possible?		
Are your HW records well organized for the next inspection?		
<b>Pollution Prevention</b>		
When processes generate waste, are P2 alternatives considered and communicated to the Environmental Office?		
<b>Training, Inspections and Record Keeping</b>		
Has FECO received hazardous waste training?		
Has an alternate FECO been assigned when the primary FECO is absent? Has the alternate FECO been trained?		

Topic	Response	Date/Observation/ Corrective Action
Has the FECO trained shop personnel on waste, material and spill management issues and has training been documented?		
Is your facility prepared for an internal and/or external inspection?		
Are assignment letters in order?		
Are all HM/HW records in order?		
<b>Spill Response Procedures</b>		
Were reportable spills reported to the NYS DEC and the Environmental Office within two hours of discovery?		
Are spills cleaned up as soon as practical?		
Are contaminated media, residue and clean-up material disposed of properly?		
Was a spill incident report form faxed to the Environmental Office at (518) 786-4400 within 24 hours of the spill incident?		

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**NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

Office of the General Counsel, Deputy Commissioner & General Counsel  
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P: (518) 402-8543 | F: (518) 402-9018  
www.dec.ny.gov

**AUG 06 2020**

**RE: Enforcement Discretion under Subpart 226-1 (Solvent Cleaning Processes)**

To Whom It May Concern:

This is to advise you that, subject to the terms set forth in this letter, the New York State Department of Environmental Conservation (Department) will exercise its authority to utilize enforcement discretion with respect to certain provisions of 6 NYCRR Subpart 226-1 (Subpart 226-1) concerning the regulation of solvent cleaning processes. The Department will exercise this authority regarding the provisions set forth below in lieu of full compliance with Subpart 226-1.

The Department amended Part 226, effective November 1, 2019. As a result, the former Part 226 was re-designated as Subpart 226-1 and renamed "Solvent Cleaning Processes". Updates under adopted Subpart 226-1 are based on the Ozone Transport Commission's (OTC) 2012 Model Rule for Solvent Degreasing in order to implement federal guidelines aimed at reducing volatile organic compounds (VOCs) emitted by solvent cleaning processes. Subpart 226-1 generally requires owners and operators of facilities that operate cold cleaners, open-top degreasers, and all types of conveyorized degreasers that carry out solvent cleaning processes to comply with various equipment specifications and control and operating requirements.

The 2019 revisions expand certain requirements to facilities that carry out solvent cleaning processes on metal objects. After December 1, 2020, the rule will apply to the cleaning of all non-metal objects. The revised rule also lowers the VOC content of cleaning solution (a maximum of 25 grams per liter at 20 degrees Celsius) for facilities using cold cleaning degreasing with an internal volume greater than two gallons, unless using a degreaser exempted under section 226-1.4(a)(4)(i) – (iii). Certain solvent cleaning processes may also be exempt under section 226-1.7, and owners and operators may seek a process specific RACT demonstration under section 226-1.6 as an alternative to compliance. Facilities subject to revised Subpart 226-1 must be in compliance with the new requirements by December 1, 2020.

On March 7, 2020, Governor Cuomo issued Executive Order 202 declaring a disaster emergency for the entire State of New York, along with several subsequent Executive Orders to address the COVID-19 emergency. As a result of the COVID-19 emergency, industries that provide solvent cleaning process parts and services in New York informed the Department that production and distribution capacity has been impacted by coronavirus, including delays in the sourcing of certain equipment and machine parts necessary for owners and operators of solvent cleaning processes to comply with the December 1, 2020 compliance date.

Acknowledging the impact on the actions and operations of New York State



businesses and the regulated community due to the COVID emergency, the Department is providing under this enforcement discretion to owners and operators of facilities that carry out solvent cleaning processes an additional 12 months, until December 1, 2021, to comply with requirements under revised section 226-1.4(a)(4) that became effective on November 1, 2019. Specifically, owners and operators conducting solvent cleaning using cold cleaning degreasing when the internal volume of the machine is greater than two gallons may continue to use a cleaning solution with a vapor pressure of 1.0 mm Hg, or less, at 20°C to demonstrate compliance with this subdivision until December 1, 2021. All other provisions of Subpart 226-1 remain in effect and will be enforced.

Thank you for your cooperation in this matter. Questions regarding this enforcement discretion should be directed to Khai Gibbs, Esq. of the Office of General Counsel at (518) 402-9185. Technical questions regarding compliance options under Subpart 226-1 should be directed to Katelyn Tamargo of the Division of Air Resources at (518) 402-8403.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Berkman', with a long horizontal flourish extending to the right.

Thomas G. Berkman  
Deputy Commissioner  
and General Counsel

cc: Regional Directors  
Regional Air Pollution Control Engineers  
Regional ECO Cpt.

EMDS #648772





**Military and  
Naval Affairs**

**KATHY HOCHUL**  
Governor  
Commander-in-Chief

**RAYMOND F. SHIELDS, JR.**  
Major General  
The Adjutant General

MNFE-EC

15 September 2021

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Parts Washers Cleaning Solvent Solution reduction of Volatile Organic Compound (VOC) content to below 25 grams per liter (g/l)

1. Reference Title 6 New York Codes Rules and Regulations (NYCRR) Subpart 226-1.4(a) (4) (Solvent Cleaning Process).
2. Effective 1 December 2021, all parts washers supporting NYARNG or MNNM, state and federal operations, will comply with the NYCRR in item 1 above. No parts washing solvents will contain VOCs in excess of 25 g/l at 20 degrees Celsius. This applies to parts washing stations using cold cleaning degreasing with an internal volume greater than two gallons.
3. The rule lowers VOC content based on the Ozone Transport Commission's (OTC) 2012 Model Rule for Solvent Degreasing in order to implement federal guidelines aimed at reducing VOCs emitted by solvent cleaning processes.
4. The point of contact for this memorandum is 1LT Steves Vanderpool at (518) 786-4367 or Mr. James Freehart at (518) 786-4555.

FOR THE ADJUTANT GENERAL:

A handwritten signature in black ink, appearing to read "Gary S. Yable".

**GARY S. YABLE**  
Director of Facilities Management  
and Engineering

CF:  
MNL, MNAV, MNNM



# AFFF FIRE FIGHTING FOAM

(PFOA/PFAS)- Accidental release

SPS-8

## GENERAL REQUIREMENTS

- For the purpose of this SPS, AFFF firefighting foam includes all Fire Fighting Foam known as aqueous film-forming foam, or AFFF. The Foam is used by DOD and other firefighting organizations to rapidly extinguish fuel fires and protect against catastrophic loss of life and property. Firefighting foams can be known to contain perfluorooctane sulfonate (PFOS or perfluorooctanoic Acid (PFOA). The NYARNG has identified the various products and **locations** in which these firefighting foams are found at **each** of our three Army Aviation Facilities (AASF's):
  - **Fire Fighting Foam- hand held operated 36 Gal firefighting foam tanks** Aircraft Hangar- floor (hand operated w/ hose)-(**contains PFOA/PFAS chemicals**).
  - **Fire Suppression Systems** in Aviation Hangars (often in Mezzanine- **does not contain-PFOA/PFAS chemicals**), however it does contain firefighting foam which has potential of accidental release requiring cleanup).

**ATTENTION:** Keep off foam and evacuate immediately.

**EVACUATE/NOTIFY:** The primary step for the initial spill observer is to evacuate the area and notify their appointed Installation On-Scene Coordinator (IOSC)/ Alternate or Supervisor and report the release immediately → **NOTIFY 911 Immediately! (see Step 1)**

- Contact the IOSC or Supervisor to Notify of AFFF release
- Notify the Environmental Office Immediately after 911. Environmental will report the spill and provide Contracted Emergency Spill Response Services for Secondary cleanup response.

**FOLLOW FACILITY EVACUATION PLAN:** Initial observers of an AFFF release **must follow the procedures for their facility evacuation plan.**

**CLEANUP:** NYARNG personnel must **NOT** attempt to cleanup spills of AFFF.

Appropriate Personal to clean up the spill will be either the Airport or local fire Department or contractor who have the means and appropriate Protective Equipment (PPE) for cleanup of an AFFF release. **No NYARNG personnel are approved for this level of PPE.**

- Areas affected by a spill must be cleared for re-entry by the Safety Office before work activities can resume.
- NYARNG AASF facilities that store AFFF at their location must have a Safety Data Sheet Available on site for both employees and emergency personnel.

## Step 1 INITIATE FACILITY EVACUATION PLAN → NOTIFY AFFF RELEASE



The IOSC / Alt or supervisor - Will Immediately Call for Emergency Assistance (911) upon AFFF Release and notify of incident and report if:

- Any NYARNG personnel are injured and property damage has occurred.

<b>Step 2</b>	<b>REPORT Discharges to the Environmental Office</b>
<p><b>Notify the NYARNG Environmental Office (MNFE-EC) immediately for all AFFF Releases. MNFE-EC phone #'s 518-786-4555, 4347, 4367, 4318 respectively.</b></p>	
<b>Step 3</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To <b><i>internally</i></b> report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9). To <b><i>externally</i></b> report a spill call: <ul style="list-style-type: none"> <li>• <b>NYS DEC Spill HOTLINE # 518-457-7362</b></li> </ul> </li> <li>• Immediately forward a copy of the completed form to MNFE-EC-view contact info on form. Information requested on the form is required by MNFE-EC staff to determine spill severity of release and course of follow-up actions/notifications. MNFE-EC will make all necessary notifications to the State of NY DEC if notification hasn't already been made. <ul style="list-style-type: none"> <li>➤ Report <b>weekend spill</b> events to JOC @ 518-786-6104/6109/4909 - JOC will contact Environmental Branch Chief → Environmental personnel</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For AFFF spills, no further action is to be taken by the IOSC or Alternate beyond what is prescribed in Step 1, 2 &amp; 3 above. The AFFF foam will be cleaned up by a professional, qualified contractor as per the direction of the Environmental Office.</li> <li>• The IOSC or Alternate will keep the affected areas of the release off-limits to personnel until the area has been cleared for re-entry.</li> </ul>	
<b>Step 5</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• MNFE-EC will ensure all waste materials to include used absorbent, liquids or soil are properly disposed of through licensed contractor.</li> <li>• Contractor will pick up contaminated materials directly from the spill site via direction of MNFE-EC and dispose of accordingly.</li> </ul>	
<b>Step 6</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>❖ An AAR should be performed by the IOSC or Alternate soon after AFFF spill event. <ul style="list-style-type: none"> <li>➤ The AAR should include discussion regarding the AFFF release and whether the appropriate emergency procedures and guidance's were followed. Assess response to the incident and implement improvements if required.</li> <li>➤ <b>Is a Commanders Critical Information Requirement (CCIR) 50 form required to be completed? Y/N-</b> (Typically completed by MNFE-EC) due to any of the following: <ol style="list-style-type: none"> <li>1. Loss of life or serious personal injury.</li> <li>2. Loss of sensitive item or disabling damage to mission critical equipment.</li> <li>3. Any incident involving injury to civilians or damage to civilian property.</li> <li>5. Any incident involving civilian/military property.</li> <li>6. Any incident involving Chemical, Biological, Radiological, Nuclear or High-yield Explosives (CBRNE)</li> </ol> </li> </ul> </li> </ul>	

# Chapter 9 Spill Response Procedures “You Spill, You Dig”

This chapter provides general spill response information on how to proceed in the event of a spill.

**Note:** Facilities with site-specific Spill Prevention Control and Countermeasure (SPCC) Plans should reference those plans when responding to spills.

## Spill Response Equipment

Ensure spill response equipment and supplies are available and restocked at all times for immediate use. Examples of spill response equipment and supplies that should be available to personnel at the facility are listed in Table 9-1. 0

**Table 9-1: Spill Response Equipment and Supplies**

Personal Protective Equipment (PPE)	Spill Response Equipment	Spill Response Supplies
<ul style="list-style-type: none"> <li>• Gloves</li> <li>• Boots</li> <li>• Goggles</li> <li>• Duct tape</li> </ul>	<ul style="list-style-type: none"> <li>• Overpack drums</li> <li>• 5-gallon containers</li> <li>• Plastic bags</li> <li>• Rakes (non-sparking)</li> <li>• Non-sparking shovels</li> <li>• Push brooms</li> <li>• Caution tape</li> <li>• Sand bags</li> </ul>	<ul style="list-style-type: none"> <li>• Absorbent pads</li> <li>• Absorbent booms/socks</li> <li>• Granular absorbent (e.g., oil-dry)</li> <li>• Absorbent pillows</li> <li>• Drain covers</li> <li>• Waste labels</li> </ul>

Keep on hand at all times spill equipment and supplies needed to respond to a 55-gallon spill and smaller spills that could occur as a result of daily operations. Please assess whether the spill is a material and situation that you can immediately address. Ensure appropriate number of trained personnel and required PPE is readily available and it is safe to respond. Ensure that compatible materials are on hand to properly respond to POL spills. As an example, it is recommended to have on hand the following items listed below to respond to a POL spill:

- 48-inch socks
- Mat pads
- Wipers
- 10-foot socks
- Pillows
- Disposal bags w/ties
- 12-inch drain blocker
- Container of dry floor sweep

Promptly clean and restore to ready condition any equipment used. Replace any spill materials used. The Installation On-Scene Coordinator (IOSC) will establish an

equipment maintenance program that is strictly followed. Table 9-2 provides the NSN for common spill response equipment.

**Table 9-2: Spill Response Equipment and Supplies Ordering Information**

NSN	Product Name	Description	Absorbent Capacity (Total)
<b>Absorbent Materials</b>			
4230-01-436-8877	Versatile Container Kit	Pre-assembled kit that contains socks, pillows, mats, disposal bags and ties, instruction manual, labels, and polyethylene kit	34 gallons
4235-01-420-3099	Large Overpack Kit	Pre-assembled kit that contains socks, drain blocker mat, pads, pillows, floor sweep, wipers, disposal bags, emergency response guidebook, instruction manual, labels, polyethylene overpack drum with threaded lid	64 gallons
4235-01-424-3130	Spill Kit	1 polyethylene mobile response kit, 10 socks 3"x4', 8 pillows 9"x9", 4 pillows 18"x18", 30 Pads 17"x19", 5 disposal bags w/ties, 1 pair of splash-resistant goggles, 1 pair of nitrile gloves, 5 HM labels, and 1 box of degreaser wipes	24 gallons
4235-01-336-5074	Pads	Absorbent pads	25 gallons
4235-01-528-0378	Pads	Pillow, absorbent, hazardous material	
7930-01-455-9536	Absorbent	Absorbent material, oil and water	47 gallons
7930-01-387-8923	Socks	55 socks, 24 in. L, 3 in. diameter	20 gallons
7930-01-301-2646	Socks	40 socks, 42 in. L, 3 in. diameter	20 gallons
4235-01-528-0401	Absorbent	1-50 quart (25 lbs) bag absorbent (granular)	
4235-01-528-0362	Sorbents, oil	1 bag granular absorbent	8 gallons
8135-01-324-2664	Cushioning material, packaging	Granular absorbent-vermiculite (4 cubic ft)	
4235-01-528-0381	Sorbent	Granular sorbent, 50 quarts	
7930-01-436-8316	Absorbent material oil & water	10 large absorbent pillows	10 gallons
7930-01-145-5797	Compound adsorbent – 25 lbs bag		
<b>Containers</b>			
8110-00-030-7780	55-gallon open head drum (steel)		
8110-00-753-4643	19-gallon open head drum (steel)		
8110-00-292-9783	55-gallon closed head drum (steel)		
8110-00-282-2520	5-gallon closed head drum (steel)		
8110-01-101-4055	85-gallon overpack/salvage drum		
8110-01-559-6485	5-gallon pail with lid (plastic)		
<b>Plastic Bags</b>			
8105-01-183-9769	30-gallon extra heavy duty, dark brown/green, 125/box		
8105-01-183-9764	58 in X 36 in heavy duty plastic bag, 75 lbs capacity		
<b>Hand Tools</b>			
LPL, DA Form 1348-65	Safety shovel (Request from USP&FO: Local Purchase List (LPL))		

Ensure that spill response equipment is clearly marked and accessible to M-Day/Unit personnel during weekend activity.

## The Spill Drill

Spills must be cleaned up as soon as practical, without risk of injury or significant exposure to personnel. The IOSC must maintain enough spill-response equipment to respond to types and quantities of hazardous chemicals and waste on site. The IOSC must also use the Spill Incident Report Form in the Plan to immediately report all spills to the HWM and the State Staff Duty Officer. Only Environmental personnel will notify the National Response Center (NRC) if necessary.

**Note:** *The IOSC should also refer to the activity Spill Prevention, Control, and Countermeasures (SPCC) Plan or the Installation Spill Contingency Plan (ISCP), if available or applicable to their facility.*

*The facilities that have SPCCPs are Rochester AASF 2, Camp Smith CSMS A , Rochester CSMS C, Farmingdale FMS 14, Jamaica FMS 9, Latham FMS 16 AASF 3, Lexington, Ronkonkoma AASF 1, Utica FMS 6.*

A minor spill (25 gallons or less) or intermediate spill (25 gallons to 55 gallons) does not pose a significant safety or health hazard (such as fire, explosion, or HM exposure) and can be absorbed, neutralized, or otherwise controlled at the time of release by personnel in the immediate spill area.

A major spill (55 gallons or more, or any spill into water) poses significant safety or health hazards (such as fire, explosion, or HM exposure). It cannot be absorbed, neutralized, or otherwise controlled at the time of release by personnel in the immediate release area.

NOTE\* Special instructions for a AFFF release is found in SPS-08. AFFF releases are reported IMMEDIATELY! **Keep off foam**, “no-contact” measures to stop or slow foam migration from reaching NYS land/drains is only permitted if safe to do so. Please refer to SPS-08 for further guidance.

The following information is located in the Army Corps of Engineers document, *You Spill, You Dig! - An Environmental Handbook for Deployment*.

When faced with the hazards of a spill, minor or major, always do the following:

- Use PPE, including gloves, goggles, and suits.
- Do the “Spill Drill” -- **REACT!**

**R**emove the source

**E**nvelope the spill

**A**bsorb/accumulate

**C**ontain the HW

### **Transmit a report**

### **Remove the Source**

STEP 1. Turn off all sources of ignition (pumps, motors, etc.).

STEP 2. Approach the spill from up wind and attempt to stop the source:

- Upright containers or roll them over so the hole is facing up.
- Close valves and turn off power to pumps.
- Transfer material to another container.
- Place leaking drums in compatible DOT-approved overpack drums.
- Transfer the material in a leaking container to another container.
- Patch holes.
- Move container to a location where it poses less of a threat.

Use a drip pan for all valves and similar dispensing equipment. Drips and leaks collected in a drip pan are not reportable spills.

STEP 3. If spill is a major spill, activate internal activity alarms or give a verbal alarm.

STEP 4. Evacuate all personnel to a safe distance up-wind from the spill, if necessary.

STEP 5. Secure the area, NOTIFY Supervisors, MNFE-EC Environmental Office and NYS DEC HOTLINE 518-457-7362.

### **Envelop the Spill**

STEP 6. Stop or slow the spread of the spill using one or more of the following methods:

- Use the nearest Spill Response Kit.
- Use compatible absorbent material to build a dike around the spill (check the material's MSDS for guidance).
- Cover spills of hazardous dusts or powders to protect against winds or strong drafts.

### **Absorb/Accumulate**

STEP 7. On a hard surface, put down dry sweep. On a gravel or mud surface, lay an absorbent sock or pad on the spill.

### **Containerize It**

STEP 8. Clean up spills by draining, absorbing, or scooping free-floating materials into a container.

STEP 9. Scoop or shovel contaminated media (soil, gravel, etc.) into a DOT-approved container for disposal, separating liquids from solids.

STEP 10. Overpack leaking, corroded, or otherwise deteriorating containers. Overpack leaking containers of liquid into larger containers.



STEP 11. Place leaking containers in overpack and fill with absorbent material. For 55-gallon drums, use approximately six inches of absorbent in the bottom of an 85-gallon overpack drum. You may not need to overpack non-liquid HW. Check with the IOOSC when in doubt.

STEP 12. Dispose of contaminated media, residue, and clean up materials as waste.

### Transmit a Report

- STEP 13. For minor or intermediate spills, notify your supervisor of the spill and measures taken to clean it up. Additionally Notify MNFE-EC Environmental Office utilizing the Spill or Hazardous Substance Release Report Form at the end of this Chapter on page 9-7.

**Note:** *You must report small spills to the NYS DEC when the material comes in contact with state land or water.*

*The NYSDEC Spill Hotline number is 1-800-457-7362.*

STEP 14. If it is a major spill do the following:

- Notify the Fire Department and provide the following information:
  - Your name
  - Location of spill
  - Substance spilled
  - Number of injured personnel and nature of injuries
  - Amount spilled and extent it has traveled
  - Amount stored and rate at which material is spilling (estimated)
  - Time spill started (occurred)
- MNFE-EC will contact an Emergency Spill contractor who can respond to the spill for cleanup.
- Complete the Spill Incident Report Form shown on page 9-7.
- Immediately notify the SSO and Environmental Office. Do not attempt to clean up the spill unless directed!

### **IMPORTANT!**

**Report** petroleum spills to the NYS DEC ( 518-457-7362) when they meet **ALL** of the following criteria:

- The spill is known to be greater than five gallons.
- The spill is **NOT** contained and under the control of the spiller.
- The spill has come in contact with or will reach the state's water or land.
- The spill is **NOT** cleaned up within two hours of discovery.

## **Spill Protocol Sheets (SPS)**

The NYARNG Environmental Office (MNFE-EC) has developed Spill Protocol Sheets (SPSs) that describe basic step-by-step spill cleanup procedures for the most commonly stocked hazardous products in the NYARNG inventory. The SPS is to be used when it has been determined that the spill is small enough that it can be cleaned-up safely by in-house personnel or when Emergency spill response is necessary.

It is likely that SPS 01; Combustible Liquids (POLs) and SPS 02; Non-POL Combustible Liquids (Antifreeze) will cover 98% or more of the potential spills that would typically occur during normal operations. SPSs are included for other products (such as acids and bases, AFFF) on a “just in case” basis. Copies of all current SPS are included at the end of this chapter. Copies of individual SPS(s) can be reproduced and posted in areas of the facility where spills are likely to occur.

## **Duties**

### **Installation On-scene Coordinator (Refer to Figure 9-1)**

- Collects all spill and material information.
- Determines if facility IRT can handle the spill or if a contractor is needed.
- Notifies IRT and dispatches them to the spill location.
- Determines if the spill is reportable under state and federal guidelines.
- If the spill is reportable, notifies the HQ Environmental Office (518-786-4347) and the NYSDEC Hotline (518-457-7362) within two hours of discovery.
- Contacts emergency services @ 911 (fire, ambulance, etc.) as needed.
- Completes the Spill or Hazardous Substance Release Report Format located in the back of this chapter and e-mail it to HQ Environmental Office (see Contact info on page 1-5 and use NYARNG outlook e-mail listing).
- Interfaces with NYSDEC and responds to their guidance and directive.
- Continues correspondence and communication with HQ Environmental Office until spill is closed.
- Maintains all spill documentation and forwards copies of disposal paperwork to the Environmental Office.

### **Installation Response Team (Refer to Figure 9-2)**

- Identifies the material spilled.
- Checks out all information about the substance, including labels, markings, and MSDSs.
- If they have training, PPE, and equipment to adequately respond to the spill, respond to the spill; otherwise, call a MNFE-EC to obtain a spill contractor.
- Before responding to a spill, put on appropriate PPE as necessary.
- Gather equipment and stop or contain the spill or leak.
- Use absorbents, such as socks, booms, or pads, to contain the spill.
- Place material in appropriate container for disposal.
- Label and mark the container.

- Place container(s) in the waste storage building for the contractor to dispose of.
- Ensure the IOSC is aware of spill material used so it can be re-stocked.

## **BE SAFE!**

When handling any spill -- BE SAFE! Below is a helpful reminder of safety procedures to follow:

**B**efore a spill happens, have a spill response kit on hand.

**E**ducate and practice spill response procedures.

**S**hut off all sources of ignition as soon as a spill occurs.

**A**pproach spills from upwind/uphill.

**F**igure out if outside emergency responder assistance is needed.

**E**vacuate any unnecessary personnel.

## **Forms and Attachments**

This section contains:

- Spill or Hazardous Substance Release Report Format
- IOSC Duties Form
- IRT Duties Form
- Spill Protocol Sheets (8)

## Spill or Hazardous Substance Release Report Format

Facility Reporting: \_\_\_\_\_ Date: \_\_\_\_\_

Person Reporting: \_\_\_\_\_ Phone #: \_\_\_\_\_

Facility Office: \_\_\_\_\_

Person Reported to at Environmental Office: \_\_\_\_\_ Date: \_\_\_\_\_

### SUMMARY:

1. Installation or Site: \_\_\_\_\_
2. Commander: \_\_\_\_\_
3. Date of Incident: \_\_\_\_\_
4. Location, Specific Areas Affected: \_\_\_\_\_
5. Cause, Source of Incident: \_\_\_\_\_
6. Material, Type, and Amount: \_\_\_\_\_
7. Damage to Surroundings: \_\_\_\_\_
8. Samples Taken: \_\_\_\_\_
9. Potential Dangers: \_\_\_\_\_
10. Corrective Actions - Elimination of Sources: \_\_\_\_\_
11. Containment Sources: \_\_\_\_\_
12. Removal of Contamination: \_\_\_\_\_
13. Assistance Required: \_\_\_\_\_
14. Estimated Completion Date: \_\_\_\_\_
15. Any New or Public Reaction: \_\_\_\_\_
16. General Discussion: \_\_\_\_\_
17. Reported to Local/State Authorities (**Include NYS DEC Spill #**): \_\_\_\_\_
18. Person Making Report: \_\_\_\_\_ Date: \_\_\_\_\_

Figure 9-1: IOSC Duties

# IOSC - Installation On-scene Coordinator "DUTIES"

- Collect all spill and material information.
- Can the facility Installation Response Team (IRT) handle the spill or is a contractor required?
- Notify and dispatch IRT to the spill location.
- Determine if the spill is reportable under state and federal guidelines.
- IF THE SPILL IS A REPORTABLE SPILL, NOTIFY THE FOLLOWING:
  - The HQ Environmental Office at 518-786-4347 and the NYS DEC HOTLINE at 1-800-457-7362 within two hours of discovery.
- Contact emergency services as necessary, i.e. the fire department and an ambulance.
- Complete Spill Release Report form or Appendix B in the ISCP and or e-mail it to the HQ Environmental Office .
- Interface with NYS DEC and respond to their guidance and directive.
- Continue correspondence and communication with HQ Environmental Office until the spill is closed.
- Maintain ALL spill documentation.



Figure 9-2: IRT Duties

# IRT - Installation Response Team “Duties”

- **Identify** the material spilled.
- Check out all information on the substance, i.e. labels, markings, and **MSDS**.
- Can you adequately **respond** to the spill, i.e. sufficient training, **PPE, and spill equipment?** IF SO then respond; IF NOT call a spill contractor!
- Prior to responding to the spill, don appropriate PPE as necessary.
- Gather equipment and stop or contain the spill or leak.
- Contain the spill using absorbents (i.e. socks, boom, and pads).
- Place material in appropriate container for disposal.
- Label and mark the container.
- Place in waste storage building for contractor disposal.
- Ensure IOSC is aware of the spill material used to ensure it is RE-STOCKED!



**Table 9-3: Spill Protocol Sheet (SPS) Index**

SPS #	SPILLED PRODUCT TYPE	PAGE #
01	COMBUSTIBLE LIQUIDS (POLS)	9-12
02	NON-POL COMBUSTIBLE LIQUIDS (ANTIFREEZE)	9-14
03	FLAMMABLE LIQUIDS (MOGAS, SOLVENTS)	9-16
04	ACIDIC LIQUIDS (BATTERY ACID, TILE CLEANER)	9-18
05	BASIC LIQUIDS (DETERGENT/SOAP, BLEACH, BOILER TREATMENTS)	9-20
06	TOXIC LIQUIDS (METALLIC MERCURY)	9-23
07	TOXIC LIQUIDS (PESTICIDES)	9-25
08	AFFF FIRE FIGHTING FOAM (PFOA/PFAS) – ACCIDENTAL RELEASE	9-27

*\*Add SPS-08 AFFF FIRE FIGHTING FOAM*

# COMBUSTIBLE LIQUIDS (POLs)

SPS-1

## GENERAL REQUIREMENTS

- Spills of Combustible Liquids (POLs) historically constitute nearly 90% of previous spill events that have occurred at NYARNG facilities or during field activities.
- For the purpose of this SPS, combustible liquids include POL products such as;
  - Fuels such as Diesel and JP8
  - Motor Oil (all weights)
  - Gearbox Lubes/Greases
  - Hydraulic Fluids (including silicone brake fluid)
  - Used Oil Mixtures
- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate.
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers can also take defensive measure to prevent a “Discharge to the Environment”, if safe to do so (See Step 3).
- Defensive measures include the use of absorbent materials to;
  - Protect drains and drainage ditches,
  - Block spill from reaching edge of pavement
- NYARNG personnel must be wearing appropriate Personal Protective Equipment (PPE), (to provide eye and skin protection), when performing spill response or cleanup duties.

## Step 1 IOSC or Alternate Evaluates Need for Emergency Response

The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;



- NYARNG personnel are injured
- There is a possibility of a fire
- Spilled POL has entered (or is migrating toward) a drain or drainage ditch
- Not enough spill kit materials are on-hand to control and contain the spill on-site.

If none of the conditions above occurred, proceed to Step 2.

## Step 2 Control the Spill

Under the Direction of the IOSC or Alternate:

Use absorbent pads/socks from on-hand spill kits.

### Use Pads & Socks to Block and Surround the POL Spill:



Grey Pads - (Universal) Absorb both Oil and Water



White Pads - Absorb Oil Only



Absorbent Socks – Universal and Oil Only



**Minimum Spill Kit**  
Size: 20-gallon POL



<b>Step 3</b>	<b>Discharges to the Environment</b>
<ul style="list-style-type: none"> <li>• Notify the NYARNG Environmental Office (MNFE-EC) via Spill or Hazardous Substance Release Report Form (See Step 4), when spills of POL occur.</li> <li>• With respect to a typical POL spill, the spill event <u>does not</u> have to be reported if all four of the following conditions are met;             <ul style="list-style-type: none"> <li>➤ The spilled POL is contained and remains under the control of the spiller.</li> <li>➤ The volume of spilled POL is known to be less than five (5) gallons.</li> <li>➤ The spill has not and will not affect unpaved land surfaces or reach surface water (lakes, rivers, creeks, ponds), including adjacent storm drains, drainage ditches or wetlands.</li> <li>➤ The spill is cleaned up within two hours of discovery.</li> </ul> </li> <li>• If no spill report is required, go directly to Step 5.</li> </ul>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form.             <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909 they will contact Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications.             <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For smaller POL spills of &lt; 20-gallons (that are not a <b>Discharge to the Environment</b>), cleanup can be performed in-house provided enough absorbent materials (spill kits) are on-hand.</li> <li>• Use absorbent pads or other absorbent materials to soak up all spilled POL.</li> <li>• Notify MNFE-EC for assistance if enough absorbents <b>are not</b> on-hand to clean-up the POL spill.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For spills cleaned up in-house, the IOSC or Alternate will ensure that POL contaminated absorbents or media (soil) is properly disposed of.</li> <li>• The MNFE-EC POC will coordinate disposal of POL contaminated absorbents and soil.             <ul style="list-style-type: none"> <li>➤ Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 2; <u>Absorbents, POL Contaminated</u>).</li> </ul> </li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after POL spill events to determine the cause and prevent reoccurrence.             <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# NON-POL COMBUSTIBLE LIQUIDS (ANTIFREEZE)

SPS-2

## GENERAL REQUIREMENTS

- For the purpose of this SPS, Non-POL Combustible Liquids include Antifreeze (both new and used) in all concentrations.
- Antifreeze spills occur most frequently when military vehicles leak coolants on the ground due to leaky radiators, hoses and other cooling system components.
- The primary step for the initial spill observer is to notify their appointed Facility Spill Coordinator (IOSC) or Alternate (Alternate).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers can also take defensive measure to prevent a “Discharge to the Environment”, if safe to do so (See Step 3).
- Defensive measures include the use of absorbent materials to;
  - Protect drains and drainage ditches,
  - Block spill from reaching edge of pavement
- NYARNG personnel must be wearing appropriate Personal Protective Equipment (PPE), (to provide eye and skin protection), when performing spill response or cleanup duties.

## Step 1 IOSC or Alternate Evaluates Need for Emergency Response

The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;



- NYARNG personnel are injured
- Spilled antifreeze has entered (or is migrating toward) a drain or drainage ditch
- Not enough spill kit materials are on-hand to control and contain the antifreeze spill on-site.

If none of the conditions above occurred, proceed to Step 2.

## Step 2 Control the Spill

Under the Direction of the IOSC or Alternate:

Use absorbent pads/socks from on-hand spill kits.

**Use Universal (Grey) Pads/Socks to Block and Surround Antifreeze Spill:**



Grey Pads - (Universal) Absorb both Oil and Water



Grey Socks – (Universal) Absorb both Oil and Water



**Minimum Spill Kit Size:** 20-gallon POL spill. Include Grey Pads/Socks for Antifreeze spills.

<b>Step 3</b>	<b>Discharges to the Environment</b>
<ul style="list-style-type: none"> <li>• Notify the NYARNG Environmental Office (MNFE-EC) via Spill or Hazardous Substance Release Report Form (See Step 4), when significant spills of Antifreeze occur.</li> <li>• With respect to a typical Antifreeze spill, the spill event <u>does not</u> have to be reported if all four of the following conditions are met; <ul style="list-style-type: none"> <li>➤ The spilled Antifreeze is contained and remains under the control of the spiller.</li> <li>➤ The volume of spilled Antifreeze is known to be less than five (5) gallons.</li> <li>➤ The spill has not and will not affect unpaved land surfaces or reach surface water (lakes, rivers, creeks, ponds), including adjacent storm drains, drainage ditches or wetlands.</li> <li>➤ The spill is cleaned up within two hours of discovery.</li> </ul> </li> <li>• If no spill report is required, go directly to Step 5.</li> </ul>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form. <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications. <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For small Antifreeze spills of &lt; 20-gallons (that are not a <b>Discharge to the Environment</b>), cleanup can be performed in-house provided enough absorbent materials (spill kits) are on-hand.</li> <li>• Use universal absorbent pads or other absorbent materials to soak up all spilled Antifreeze.</li> <li>• Notify MNFE-EC for assistance if enough universal absorbents <b>are not</b> on-hand to clean-up the antifreeze spill.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For spills cleaned up in-house, the IOSC or Alternate will ensure that Antifreeze contaminated absorbents or media (soil) is properly disposed of.</li> <li>• Soil/absorbents contaminated with Antifreeze will typically need to be kept separate from POL contaminated soil/absorbents.</li> <li>• The MNFE-EC POC will help coordinate disposal of Antifreeze contaminated absorbents and soil. <ul style="list-style-type: none"> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; <u>Absorbents from Spills of Hazardous Products</u>).</li> </ul> </li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after Antifreeze spill events to determine the cause and prevent reoccurrence. <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# FLAMMABLE LIQUIDS (MOGAS, SOLVENTS)

SPS-3

## GENERAL REQUIREMENTS

- For the purpose of this SPS, Flammable Liquids include certain POLs and other HC products that have a low Flashpoint such as;
  - Fuels such as Mogas and white gas
  - Oil-Based Paints
  - Paint Thinner
  - Cleaning Solvents (chemicals such as Acetone, Toluene, Xylene or MEK)
  - Charcoal Lighter Fluid

**CAUTION: Spills of Flammable Liquids that occur indoors or in confined spaces can create a fire hazard and a hazardous breathing zone. (See Step 1).**

- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate Spill Coordinator (Alternate).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers of outdoor flammable liquid spills can take defensive measure to prevent a **“Discharge to the Environment”** (See Step 3), if safe to do so.
- Defensive measures include the use of absorbent materials to;
  - Protect drains and drainage ditches,
  - Block spill from reaching edge of pavement
- NYARNG personnel must be wearing appropriate Personal Protective Equipment (PPE), (to provide eye and skin protection), when performing spill response or cleanup duties.

## Step 1 IOSC or Alternate Evaluates Need for Emergency Response

The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;



- NYARNG personnel are injured
- There is a possibility of a fire
- The spill creates a breathing hazard (inside the building)
- A spilled Flammable Liquid has entered (or is migrating toward) a drain or drainage ditch
- Not enough spill kit materials are on-hand to control and contain the spill on-site.

**If none of the conditions above have occurred, proceed to Step 2.**

## Step 2 Control the Spill

Under the Direction of the IOSC or Alternate:

Use absorbent pads/socks from on-hand spill kits.

**Use Pads & Socks to Block and Surround the Flammable Liquid Spill:**



Grey Pads - (Universal) Absorb both Oil and Water



White Pads - Absorb Oil Only



Absorbent Socks – Universal and Oil Only



**Minimum Spill Kit Size: 20-gallon POL**

<b>Step 3</b>	<b>Discharges to the Environment</b>
<ul style="list-style-type: none"> <li>• Notify the NYARNG Environmental Office (MNFE-EC) via Spill or Hazardous Substance Release Report Form (See Step 4), when significant spills of Flammable Liquids occur.</li> <li>• With respect to a typical flammable liquid spill, the spill event <u>does not</u> have to be reported if all four of the following conditions are met;             <ul style="list-style-type: none"> <li>➤ The spill is contained and remains under the control of the spiller and does not create a breathing hazard inside a facility.</li> <li>➤ The volume of spilled product is known to be less than five (5) gallons.</li> <li>➤ The spill has not and will not affect unpaved land surfaces or reach surface water (lakes, rivers, creeks, ponds), including adjacent storm drains, drainage ditches or wetlands.</li> <li>➤ The spill is cleaned up within two hours of discovery.</li> </ul> </li> <li>• If no spill report is required, go directly to Step 5.</li> </ul>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form.             <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications.             <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For small Flammable Liquid spills of &lt; 5-gallons (that are not a <b>Discharge to the Environment</b>), cleanup can be performed in-house provided enough absorbent materials (spill kits) are on-hand.</li> <li>• Use universal absorbent pads or other absorbent materials to soak up all spilled flammable liquid.</li> <li>• Notify MNFE-EC for assistance if enough universal absorbents <b>are not</b> on-hand to clean-up the flammable product spill.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For spills cleaned up in-house, the IOSC or Alternate will ensure that absorbents or media (soil) contaminated with a flammable product are properly disposed of.</li> <li>• Soil/absorbents contaminated with flammable products will typically need to be kept separate from POL contaminated soil/absorbents.</li> <li>• The MNFE-EC POC will help coordinate disposal of contaminated absorbents and soil.</li> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; <u>Absorbents from Spills of Hazardous Products</u>).</li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after Flammable Liquid spill events to determine the cause and prevent reoccurrence.             <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# ACIDIC LIQUIDS

## (Battery Acid, Tile Cleaner)

SPS-4

### GENERAL REQUIREMENTS

- For the purpose of this SPS, Acidic Liquids include HC products that have a low pH (3.0 or less);
  - Battery Acid (contains Sulfuric Acid)
  - Tile Cleaners (contain Hydrochloric/Muriatic Acid)

**CAUTION:** Spills of Acidic Liquids that occur indoors or in confined spaces can create a hazardous breathing zone and cause severe burns if it comes in contact with exposed skin. (See Step 1).

- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate Spill Coordinator (Alt-USC).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers of acidic liquid spills can take defensive measure to prevent a “**Discharge to the Environment**” (See Step 3), if safe to do so.
- NYARNG facilities that stock HC products consisting of Acidic Liquids must have specialty spill kit items on hand that include acid neutralizing absorbent pads (pink) and/or baking soda.
- Defensive measures include the use of Baking soda and special (pink) absorbent pads to;
  - Protect drains and drainage ditches
  - Neutralize and absorb the spilled material
- NYARNG personnel must be wearing appropriate Personal Protective Equipment (PPE), (to provide eye and skin protection), when performing spill response or cleanup duties.

### Step 1 IOSC or Alternate Evaluates Need for Emergency Response

The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;



- NYARNG personnel are injured
- The spill creates a breathing hazard (inside the building)
- A spilled Acidic Liquid has entered (or is migrating toward) a drain or drainage ditch
- Not enough spill kit materials are on-hand to control and contain the spill on-site.

If none of the conditions above have occurred, proceed to Step 2.

### Step 2 Control the Spill

**Under the Direction of the IOSC or Alternate:**

Use absorbent pads/socks from acid spill kits only!

#### Use Special (Pink) Pads & Socks to Absorb and Neutralize Acid Spills



Pink Pads W/ Baking Soda Neutralize and Absorb Spilled Acid



Baking Soda – Acid Neutralizer Only



Spill kit to include Acid Resistant PPE

<b>Step 3</b>	<b>Discharges to the Environment</b>
<ul style="list-style-type: none"> <li>• Notify the NYARNG Environmental Office (MNFE-EC) via Spill or Hazardous Substance Release Report Form (See Step 4), when significant spills of Acid occur.</li> <li>• With respect to a typical acid spill, the spill event <u>does not</u> have to be reported if all four of the following conditions are met;             <ul style="list-style-type: none"> <li>➤ The spill is contained and remains under the control of the spiller and does not create a breathing hazard inside a facility.</li> <li>➤ The volume of spilled product is known to be less than one (1) gallon.</li> <li>➤ The spill has not and will not affect unpaved land surfaces or reach surface water (lakes, rivers, creeks, ponds), including adjacent storm drains, drainage ditches or wetlands.</li> <li>➤ The spill is cleaned up within two hours of discovery.</li> </ul> </li> <li>• If no spill report is required, go directly to Step 5.</li> </ul>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form.             <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications.             <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For small Acid spills of &lt; 1-gallon (that are not a <b>Discharge to the Environment</b>), cleanup can be performed in-house provided enough specialty (acid-neutralizing) absorbent materials and/or baking soda are on-hand.</li> <li>• Use acid-only pads that contain baking soda to soak up all spilled acid.</li> <li>• Notify MNFE-EC for assistance if enough acid-neutralizing absorbents <b>are not</b> on-hand to clean-up the spill.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For acid spills cleaned up in-house, the IOSC or Alternate will ensure that used absorbents, baking soda or media (soil) contaminated with acid are properly disposed of.</li> <li>• Soil/absorbents contaminated with acidic products will typically need to be kept separate from POL contaminated soil/absorbents.</li> <li>• The MNFE-EC POC will help coordinate disposal of contaminated absorbents, baking soda and soil.</li> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; <u>Absorbents from Spills of Hazardous Products</u>).</li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after spill events involving Acidic Liquids to determine the cause and prevent reoccurrence.             <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# BASIC LIQUIDS

(Detergent, Soap, Kitchen Bleach, Boiler Treatment)

SPS-5

## GENERAL REQUIREMENTS

- For the purpose of this SPS, Basic Liquids include HC products that have a high pH (10.0 or greater);
  - Detergents and Soaps, Industrial Strength (contain Sodium Hydroxide or Sodium Metasilicate)
  - Boiler Treatment solutions (contain Sodium Hydroxide and/or Amines)
  - Kitchen Bleach (dissolved in Sodium Hydroxide solution)

**CAUTION:** Spills of Kitchen Bleach that occur indoors or in confined spaces can create a hazardous breathing zone and cause burns if it comes in contact with exposed skin. (See Step 1).

- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate Spill Coordinator (Alternate).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers of basic liquid spills can take defensive measure to prevent a “**Discharge to the Environment**” (See Step 3), if safe to do so.
- NYARNG facilities that stock industrial strength soaps/detergents must have spill kits on hand that include universal absorbent pads (Grey).
- Defensive measures include the use of universal absorbent pads to;
  - Protect drains and drainage ditches
  - Absorb the spilled material
- NYARNG personnel must be wearing appropriate Personal Protective Equipment (PPE), (to provide eye and skin protection), when performing spill response or cleanup duties.

## Step 1 IOSC or Alternate Evaluates Need for Emergency Response

The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;



- NYARNG personnel are injured
- A spill of kitchen bleach creates a breathing hazard (inside the building)
- A spilled Basic Liquid has entered (or is migrating toward) a drain or drainage ditch
- Not enough spill kit materials are on-hand to control and contain the spill on-site.

If none of the conditions above have occurred, proceed to Step 2.

## Step 2 Control the Spill

Under the Direction of the IOSC or Alternate:

Use absorbent pads/socks from on-hand spill kits

**Use Universal Pads & Socks to Absorb Soap/Detergent Spills:**



Grey Pads – Use (Universal) Absorbent Pads and Socks to Absorb Spilled Soap and Soapy Water



**For Facilities that Stock Basic Liquids:** Spill kit to include Base Resistant



<b>Step 3</b>	<b>Discharges to the Environment</b>
<ul style="list-style-type: none"> <li>• Notify the NYARNG Environmental Office (MNFE-EC) via Spill or Hazardous Substance Release Report Form (See Step 4), when significant spills of Bases occur.</li> <li>• With respect to a typical base spill, the spill event <u>does not</u> have to be reported if all four of the following conditions are met; <ul style="list-style-type: none"> <li>➤ The spill is contained and remains under the control of the spiller and does not create a breathing hazard inside a facility.</li> <li>➤ The volume of spilled product is known to be less than one (1) gallon.</li> <li>➤ The spill has not and will not affect unpaved land surfaces or reach surface water (lakes, rivers, creeks, ponds), including adjacent storm drains, drainage ditches or wetlands.</li> <li>➤ The spill is cleaned up within two hours of discovery.</li> </ul> </li> <li>• If no spill report is required, go directly to Step 5.</li> </ul>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form. <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications. <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For most small Basic Liquid spills &lt; 1-gallon (that are not a <b>Discharge to the Environment</b>; including soaps, detergents and boiler treatments), cleanup can be performed in-house with Universal Absorbent pads/socks.</li> <li>• Use an excess of water to dilute spills of Basic Liquids, and to clean residues from floors or other paved surfaces. <ul style="list-style-type: none"> <li>➤ For outdoor spills, a wet vacuum is used to collect cleanup water.</li> </ul> </li> <li>• Cleanup water can be discharged into a sanitary sewer (indoor) floor drain, but must be kept out of (outdoor) storm drains.</li> <li>• Notify MNFE-EC for assistance if enough Universal absorbent pads/socks <b>are not</b> on-hand to clean-up the spill.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For base spills cleaned up in-house, the IOSC or Alternate will ensure that used absorbents or media (soil) contaminated with base are properly disposed of.</li> <li>• Soil/absorbents contaminated with basic products will typically need to be kept separate from POL contaminated soil/absorbents.</li> <li>• The MNFE-EC POC will help coordinate disposal of contaminated absorbents and soil.</li> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; <u>Absorbents from Spills of Hazardous Products</u>).</li> </ul>	

<b>Step 7</b>	<b>After Action Review (AAR)</b>
	<ul style="list-style-type: none"><li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after spill events involving Basic Liquids to determine the cause and prevent reoccurrence.<ul style="list-style-type: none"><li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li></ul></li></ul>

# TOXIC LIQUID (Metallic Mercury)

**SPS-6**

## GENERAL REQUIREMENTS

For the purpose of this SPS, Toxic Liquids include mercury in its metallic or elemental form and include spills from Mercury Containing Devices (MCDs) ;

- Medical or Scientific Instruments (thermometers, barometers)
- Mercury Switches (thermostat, boiler controls)

**CAUTION: Mercury Spills that occur indoors or in confined spaces will create a hazardous breathing zone in the room or area where the spill occurred. (See Step 1).**

- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate Spill Coordinator (Alternate).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers of a mercury spill can take defensive measure to prevent exposure of personnel, defensive measures include;
  - Close/lock doors to seal off room/area where spill occurred.
  - Post area to keep other personnel out.
- NYARNG facilities or units that have medical devices/instruments or other devices that contain metallic mercury must have a mercury spill kit on-hand (See Step 2).
- NYARNG personnel must not attempt to cleanup mercury spills beyond treatment of spill area as prescribed to deploy the mercury spill kit.
- Appropriate Personal Protective Equipment (PPE) for cleanup of a mercury spill includes breathing protection.
- Cleanup of mercury spills will be performed by private remediation contractor. Areas affected by a spill must be cleared for re-entry by the contractor before work activities can resume.

## Step 1 IOSC or Alternate Evaluates Need for Emergency Response



**The IOSC or Alternate Will Immediately Call for Emergency Assistance (911) if;**

- Any NYARNG personnel are injured

**If the condition above has not occurred, proceed to Step 2.**

## Step 2 Control the Spill

**Under the Direction of the IOSC or Alternate:**

### Use Absorbent from Mercury Spill Kit to Cover the Spill Area



Absorbents from Mercury Spill Kit will help keep vapors from migrating out of ...



**A Mercury Spill Kit: On-Hand at Facilities with MCDs in Stock**

<b>Step 3</b>	<b>Discharges to the Environment</b>
<b>Notify the NYARNG Environmental Office (MNFE-EC) immediately for all Mercury spills.</b>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form.             <ul style="list-style-type: none"> <li>➤ Report weekend spill events to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications.             <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For mercury spills, no further action is to be taken by the IOSC or Alternate beyond what is prescribed in Step 2 above.</li> <li>• Use Mercury Spill Kits IAW all label instructions.</li> <li>• The IOSC or Alternate will keep the area(s) of the facility affected by the spill off-limits to personnel until the area has been cleared for re-entry.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For mercury spills, the IOSC or Alternate will coordinate with MNFE-EC to ensure that used absorbent powder or other contaminated media (rags, carpet, soil) are properly disposed of.</li> <li>• Soil/absorbents contaminated with mercury will typically need to be contained separately from all other waste material.</li> <li>• The MNFE-EC POC will help coordinate disposal of mercury contaminated absorbents and soil.</li> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; <a href="#">Absorbents from Spills of Hazardous Products</a>).</li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after mercury spill events to determine the cause and prevent reoccurrence.             <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# TOXIC LIQUID (Pesticides)

**SPS-7**

**GENERAL REQUIREMENTS**

- For the purpose of this SPS, Toxic Liquids include all pesticide products, available through federal supply or sold over the counter. These products include (but are not limited to);
  - Herbicides (weed killers)
  - Insecticides (bug killers and repellants)
  - Fungicides (lawn & garden treatments)
  - Rodenticides (rat/mouse poisons)

**CAUTION:** Pesticide spills that occur indoors or in confined spaces will create a hazardous breathing zone in the room or area where the spill occurred. (See Step 1).

- The primary step for the initial spill observer is to notify their appointed Installation On-Scene Coordinator (IOSC) or Alternate Spill Coordinator (Alternate).
  - Reference the posted Emergency Spill Telephone Roster
  - Call the IOSC and Installation Response Team (IRT) members in order listed
- Initial observers of a pesticide spill can take defensive measure to prevent exposure of personnel, defensive measures include;
  - Close/lock doors to seal off room/area where spill occurred.
  - Post area to keep other personnel out.
- NYARNG personnel must not attempt to cleanup spills of pesticides.
- Appropriate Personal Protective Equipment (PPE) for cleanup of a pesticide spill includes breathing protection. No NYARNG personnel are approved for this level of PPE.
- Cleanup of pesticide spills will be performed by private remediation contractor. Areas affected by a spill must be cleared for re-entry by the contractor before work activities can resume.
- NYARNG facilities/units that stock pesticides in their inventory of HC products must have a segregated storage location for these products (away from POLs or other HC products).

**Step 1 IOSC or Alternate Evaluates Need for Emergency Response**



**The IOSC or Alt Will Immediately Call for Emergency Assistance (911) if;**

- Any NYARNG personnel are injured

**If the condition above has not occurred, proceed to Step 2.**

**Step 2 Control the Spill**

**Under the Direction of the IOSC or Alternate:**

**Block Spilled Pesticides with  
Universal Pads/Socks  
Take No Further Action!**



**Take No Action Beyond  
Basic Defense  
Measures Described in  
Step 1 Above**

Grey Pads – Universal Absorbent Pads and Socks

<b>Step 3</b>	<b>Discharges to the Environment</b>
<p><b>Notify the NYARNG Environmental Office (MNFE-EC) immediately for all Pesticide spills.</b></p>	
<b>Step 4</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To internally report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9).</li> <li>• Immediately forward a copy of the completed form to MNFE-EC. Use contact info on form. <ul style="list-style-type: none"> <li>➤ Report weekend spill events on to the JOC J3 office at 518 786-6104/ 6109/ 4909, they will contact the Environmental Office (MNFE-EC).</li> </ul> </li> <li>• Information requested on the form is required for MNFE-EC POCs to determine spill severity and course of follow-up actions/notifications. <ul style="list-style-type: none"> <li>➤ MNFE-EC will make all necessary notifications to the State of NY DEC as needed.</li> </ul> </li> </ul>	
<b>Step 5</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For pesticide spills, no further action is to be taken by the IOSC or Alternate beyond what is prescribed in Step 2 above.</li> <li>• The IOSC or Alternate will keep the area(s) of the facility affected by the spill off-limits to personnel until the area has been cleared for re-entry.</li> </ul>	
<b>Step 6</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• For pesticide spills, the IOSC or Alternate will coordinate with MNFE-EC to ensure that used absorbent or other contaminated media (soil) are properly disposed of.</li> <li>• Soil/absorbents contaminated with pesticides will typically need to be contained separately from all other waste material.</li> <li>• The MNFE-EC POC will help coordinate disposal of pesticide contaminated absorbents and soil.</li> <li>• Contaminated soil and absorbents will be picked up directly from the spill site by a licensed waste disposal vendor (See WPS 1; Absorbents from Spills of Hazardous Products).</li> </ul>	
<b>Step 7</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• Whether requested formally or not, an AAR should be performed by the IOSC or Alternate after pesticide spill events to determine the cause and prevent reoccurrence. <ul style="list-style-type: none"> <li>➤ The AAR should include a discussion of the amount of spill cleanup materials used and whether spill kits need to be re-stocked.</li> </ul> </li> </ul>	

# AFFF FIRE FIGHTING FOAM

## (PFOA/PFAS)- Accidental release

SPS-8

### GENERAL REQUIREMENTS

- For the purpose of this SPS, AFFF firefighting foam includes all Fire Fighting Foam known as aqueous film-forming foam, or AFFF. The Foam is used by DOD and other firefighting organizations to rapidly extinguish fuel fires and protect against catastrophic loss of life and property. Firefighting foams can be known to contain perfluorooctane sulfonate (PFOS) or perfluorooctanoic Acid (PFOA). The NYARNG has identified the various products and **locations** in which these firefighting foams are found at **each** of our three Army Aviation Facilities (AASF's):
  - **Fire Fighting Foam- hand held operated 36 Gal firefighting foam tanks** Aircraft Hangar- floor (hand operated w/ hose)-(**contains PFOA/PFAS chemicals**).
  - **Fire Suppression Systems** in Aviation Hangars (often in Mezzanine- **does not contain-PFOA/PFAS chemicals**), however it does contain firefighting foam which has potential of accidental release requiring cleanup).

**ATTENTION:** Keep off foam and evacuate immediately.

**EVACUATE/ NOTIFY:** The primary step for the initial spill observer is to evacuate the area and notify their appointed Installation On-Scene Coordinator (IOSC)/ Alternate or Supervisor and report the release immediately → **NOTIFY 911 Immediately! (see Step 1)**

- Contact the IOSC or Supervisor to Notify of AFFF release
- Notify the Environmental Office Immediately after 911. Environmental will report the spill and provide Contracted Emergency Spill Response Services for Secondary cleanup response.

**FOLLOW FACILITY EVACUATION PLAN:** Initial observers of an AFFF release **must follow the procedures for their facility evacuation plan.**

**CLEANUP:** NYARNG personnel must **NOT** attempt to cleanup spills of AFFF.

Appropriate Personal to clean up the spill will be either the Airport or local fire Department or contractor who have the means and appropriate Protective Equipment (PPE) for cleanup of an AFFF release. **No NYARNG personnel are approved for this level of PPE.**

- Areas affected by a spill must be cleared for re-entry by the Safety Office before work activities can resume.
- NYARNG AASF facilities that store AFFF at their location must have a Safety Data Sheet Available on site for both employees and emergency personnel.

### Step 1 INITIATE FACILITY EVACUATION PLAN → NOTIFY AFFF RELEASE



**The IOSC / Alt or supervisor - Will Immediately Call for Emergency Assistance (911) upon AFFF Release and notify of incident and report if:**

- Any NYARNG personnel are injured and property damage has occurred.

<b>Step 2</b>	<b>REPORT Discharges to the Environmental Office</b>
<p><b>Notify the NYARNG Environmental Office (MNFE-EC) immediately for all AFFF Releases. MNFE-EC phone #'s 518-786-4555, 4347, 4367, 4318 respectively.</b></p>	
<b>Step 3</b>	<b>Spill Reporting</b>
<ul style="list-style-type: none"> <li>• To <b><i>internally</i></b> report a spill, use the Spill or Hazardous Substance Release Report Form included in this plan (See Chapter 9). To <b><i>externally</i></b> report a spill call:             <ul style="list-style-type: none"> <li>• <b>NYS DEC Spill HOTLINE # 518-457-7362</b></li> </ul> </li> <li>• Immediately forward a copy of the completed form to MNFE-EC-view contact info on form. Information requested on the form is required by MNFE-EC staff to determine spill severity of release and course of follow-up actions/notifications. MNFE-EC will make all necessary notifications to the State of NY DEC if notification hasn't already been made.             <ul style="list-style-type: none"> <li>➤ Report <b>weekend spill</b> events to JOC @ 518-786-6104/6109/4909 - JOC will contact Environmental Branch Chief → Environmental personnel</li> </ul> </li> </ul>	
<b>Step 4</b>	<b>Spill Cleanup</b>
<ul style="list-style-type: none"> <li>• For AFFF spills, no further action is to be taken by the IOSC or Alternate beyond what is prescribed in Step 1, 2 &amp; 3 above. The AFFF foam will be cleaned up by a professional, qualified contractor as per the direction of the Environmental Office.</li> <li>• The IOSC or Alternate will keep the affected areas of the release off-limits to personnel until the area has been cleared for re-entry.</li> </ul>	
<b>Step 5</b>	<b>Waste Disposal</b>
<ul style="list-style-type: none"> <li>• MNFE-EC will ensure all waste materials to include used absorbent, liquids or soil are properly disposed of through licensed contractor.</li> <li>• Contractor will pick up contaminated materials directly from the spill site via direction of MNFE-EC and dispose of accordingly.</li> </ul>	
<b>Step 6</b>	<b>After Action Review (AAR)</b>
<ul style="list-style-type: none"> <li>• An AAR should be performed by the IOSC or Alternate soon after AFFF spill event.             <ul style="list-style-type: none"> <li>➤ The AAR should include discussion regarding the AFFF release and whether the appropriate emergency procedures and guidance's were followed. Assess response to the incident and implement improvements if required.</li> <li>➤ <b>Is a Commanders Critical Information Requirement (CCIR) 50 form required to be completed? Y/N-</b> (Typically completed by MNFE-EC) due to any of the following:                 <ol style="list-style-type: none"> <li>1. Loss of life or serious personal injury.</li> <li>2. Loss of sensitive item or disabling damage to mission critical equipment.</li> <li>3. Any incident involving injury to civilians or damage to civilian property.</li> <li>5. Any incident involving civilian/military property.</li> <li>6. Any incident involving Chemical, Biological, Radiological, Nuclear or High-yield Explosives (CBRNE)</li> </ol> </li> </ul> </li> </ul>	



# Chapter 10 Glossary and Acronyms

## Glossary

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

**Accumulation** - The process of collecting waste in containers or tanks on site before shipping to a Treatment, Storage, and Disposal Facility (TSD). Waste can be accumulated at Accumulation Areas and Hazardous Waste Storage Areas.

**Accumulation Start Date (ASD)** - The date when a hazardous waste first becomes subject to the accumulation time limits. This is the date the waste is first placed into a container within a HWSB.

**Activity** - For the purposes of this manual, the term Activity includes any installation or facility in the NYARNG (i.e., an FMS, CSMS, AASF, the Armed Forces Reserve Center, or training site).

**Acute Hazardous Waste** - The commercial hazardous chemical products, manufacturing hazardous chemical intermediates, and off-specification commercial hazardous chemical products or manufacturing hazardous chemical intermediates listed in 6 NYCRR Part 371.4(d).

**Affirmative Procurement** - Part of a national federal strategy to encourage recycling by creating a demand for recycled products and also helps to reduce reliance on virgin materials.

**Bulk Transfer** - Any movement of liquid from one container to another by pumping, pouring, or other means. This term does not include dispensing liquid for its intended use (i.e., dispensing fuel to a vehicle fuel tank).

**Characteristically Hazardous Waste** - Described in 6 NYCRR Part 371.3. Characteristically hazardous wastes are solid wastes that meet or exceed the thresholds established for any of the characteristics identified in Part 371.3. These characteristics are ignitability, corrosivity, reactivity, and toxicity.

**Conditionally Exempt Small Quantity Generator (CESQG)** - Activities that are as follows:

- Produce no more than 220 pounds/month of hazardous waste.
- Accumulate no more than 2,200 pounds of hazardous waste on site.
- Generate less than 220 pounds of any residue or contaminated soil, waste, or other debris resulting from the cleanup of any acute waste release.

**Disposal** - Generally refers to land disposal at permitted facilities, but it may also include wastewater effluent discharged to surface waters. Disposal is considered the least favorable waste management alternative because of the harmful effects these wastes can have on the environment. When evaluating pollution prevention and waste management options, the EQCC needs to take into account the hazard and liability concerns associated with transporting and disposing of wastes.

**Environmental Quality Control Committee (EQCC)** - The NYARNG Environmental Quality Control Committee (EQCC) coordinates activities of the environmental programs covered in AR 200-1. The EQCC, chaired by the Chief of Staff, advises the Adjutant General on environmental priorities, policies, strategies, and programs. The EQCC consists of members representing the operational, engineering, planning, resource management, legal, medical, and safety interests of the NYARNG.

**Facility Environmental Compliance Officer** - A commissioned officer or a non-commissioned officer designated to implement the environmental program at facilities where vehicle or aircraft maintenance activities are conducted.

**Hazardous Chemical** - Any element, chemical compound, or mixture of elements and compounds that is a physical or health hazard. Chemicals with physical hazards include combustible liquids, compressed gases, explosives, flammables, organic peroxides, oxidizers, pyrophoric chemicals that will ignite spontaneously in air, unstable chemicals, and water-reactive chemicals. Chemicals with health hazards are those for which there is significant evidence that the chemical has an acute or chronic effect on the health of exposed people. See 29 CFR 1910.1200, Appendix A and Appendix B for further definitions, explanations, and criteria for identifying hazardous chemicals.

**Hazardous Material (HM or HazMat)** - Defined by the U.S. Department of Transportation (DOT) as anything that, due to its chemical, physical, or biological nature, causes safety, public health, or environmental concerns. Hazardous materials include hazardous waste and materials exhibiting explosive, flammable, corrosive, and oxidizing properties.

**Hazardous Substance** - In general, any material that may pose a substantial hazard to human health or the environment. For the purposes of this Plan, a hazardous substance is any of the following:

- Any hazardous waste having the characteristics identified under the RCRA.
- Any material regulated as a hazardous material per DOT.
- Any material that requires an MSDS per OSHA.
- Any substance designated according to CERCLA, CWA, CSAA, or TSCA.

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

- It is ignitable, corrosive, reactive, or toxic as measured by standard test methods or as can be reasonably determined by generators through knowledge of the waste generating process.
- It is specifically listed as such in 6 NYCRR Part 371.4.

**Hazardous Waste Storage Building (HWSB)** - A central management location where waste is temporarily stored before shipment off site.

**Hazardous Waste Mixtures** - A mixture of a solid waste with a characteristically hazardous or listed hazardous waste. Mixtures containing listed hazardous wastes are listed hazardous wastes (except for certain mixtures containing F003 listed wastes). Mixtures of solid waste with characteristically hazardous waste (or F003 listed waste) are hazardous waste only if the final mixture exhibits a hazardous characteristic.

**HAZMAT Employee** - Personnel in the NYARNG who load, unload, or handle hazardous materials or prepare them for shipment; personnel responsible for safety during hazardous materials transportation; and personnel who operate a vehicle used to transport hazardous materials.

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

**Listed Hazardous Waste** - A solid waste is a listed hazardous waste if it is listed in 6 NYCRR Part 371.4. Each hazardous waste listed in Part 371.4 is assigned an EPA Hazardous Waste Number that precedes the name of the waste. Listed hazardous wastes are hazardous by definition and do not require laboratory analysis to make a determination as hazardous.

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

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

**Pollution Prevention (P2)** - Source reduction and other practices that efficiently use raw materials and resources to reduce or eliminate the creation of pollutants.

**Recycling** - Reusing or regenerating materials and wastes into usable products and by-products. Includes practices such as material exchange, recovery of materials, and composting of organic waste matter.

**Release** - Under the Emergency Planning and Community Right-to-Know Act (EPCRA), release includes emitting, discharging, dumping, or disposing any hazardous chemical or substance into the environment. Does not include chemical shipments off site to other facilities for disposal, recycling, energy recovery, or treatment.

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

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

**Small Quantity Generator (SQG)** - An activity that generates more than 220 pounds, but less than 2,200 pounds of hazardous waste per month, and does not accumulate more than 13,200 pounds of hazardous waste at any one time. An SQG may accumulate hazardous waste for no more than 180 days from the Accumulation Start Date unless they are located more than 200 miles from a hazardous waste Treatment, Storage, and Disposal Facility (TSDF). In this case, they may accumulate hazardous waste for no more than 270 days from the Accumulation Start Date.

**Solid Waste** - All discarded materials including solids, semi-solids, sludge, liquids, and compressed gases are solid wastes unless excluded by regulation. A discarded material is any material that is abandoned, recycled, or considered inherently waste-like (6 NYCRR Part 371.1(c)).

**Source Reduction** - Using materials, processes, or practices that reduce or eliminate the quantity and toxicity of wastes at the start of a process. Can be achieved by material substitution, preventive maintenance of equipment, improved operational processes, or better housekeeping.

**Spill** - Accidental leaking, pumping, emitting, discharging, emptying, or dumping of waste or materials.

**Storage** - Holding hazardous waste for a temporary period, at the end of which it is treated, disposed of, or stored elsewhere.

**Transfer** - Physical movement of waste from one activity or point to another, such as from a SAA to an HWSB or off site to a Treatment, Storage, and Disposal Facility.

**Treatment** - Any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character of any hazardous waste. Examples include incineration, biological treatment, thermal oxidation, or compaction. May reduce the volume of waste or create a less concentrated or toxic waste; may also transfer hazardous materials from one medium to another.

**Unit Environmental Compliance Officer** - A commissioned officer or a non-commissioned officer designated to implement the environmental program for their unit at the facility where their unit is assigned.

**Universal Waste** - Defined in 6 NYCRR Subpart 374-3, universal wastes include certain batteries, pesticides, mercury thermostats, and lamps.

**Used Oil** - Any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities. Includes fuel oils, motor oils, gear oils, cutting oils, transmission fluids, and hydraulic fluids.

**Waste Consolidation** - Any movement of a waste from multiple containers to one container by pumping, pouring or other means. This term does not include dispensing a liquid for its intended use (i.e., dispensing fuel to a vehicle fuel tank).

**Waste Stream** - Collective wastes that may be accumulated, consolidated, or bulked into the same container for disposal or recycling.

## Acronyms

AASF	Army Aviation Support Facility
ACE	Army Environmental Center
ALSM	Army Logistics and Surface Maintenance
AR 200-1	Army Regulation 200-1
ASD	Accumulation Start Date
AUL	Authorized Use List
BMP	Best Management Practice
CAGE	Manufacturer's Code
CARC	Chemical Agent Resistant Coating
CCA	Chromated Copper Arsenate
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CLP	Cleaning, Lubricant, and Petroleum
CSMS	Combined Support Maintenance Shop
DA PAM	Department of the Army Pamphlet
DCO	Defense Connect Online
DENIX	Defense Environmental Network and Information Exchange
DLA	Defense Logistics Agency
DMNA	Department of Military and Naval Affairs
DMNA-EC	Department of Military and Naval Affairs – Environmental Office
DMS	District Maintenance Supervisor
DoD	Department of Defense
DOT	Department of Transportation
DRMO	Defense Reutilization Marketing Office
DTR	Defense Transportation Regulations
ECAS	Environmental Compliance Assessment System
ECO	Environmental Compliance Officer
EMS	Environmental Management System
EPA	Environmental Protection Agency
EPAS	Environmental Performance Assessment
EPCRA	Emergency Planning and Community Right-to-Know Act
EPM	Environmental Program Manager
EO	Executive Order
EQCC	Environmental Quality Control Committee
EWC	Environmental Waste Contractor
FEC	Facility Environmental Coordinator
FECO	Facility Environmental Compliance Officer
FHWA	Federal Highway Administration
FMS	Field Maintenance Shop
FRH	Flameless Ration Heater
GAA	Grease, Artillery, and Automotive
GHS	Global Harmonization System
GKO	Guard Knowledge Online
GSA	General Services Administration
HCC	Hazard Characteristic Code
HEPA	High Efficiency Particulate Air
HID	High Intensity Discharge

HM	Hazardous Materials
HMIRS	Hazardous Material Information Resource System
HMUG	Hazardous Material Use Group
HMWMP	Hazardous Materials and Waste Management Plan
HSWA	Hazardous and Solid Waste Amendments
HW	Hazardous Waste
HWM	Hazardous Waste Manager
HWSB	Hazardous Waste Storage Building
HVLP	High Volume Low-Pressure
IAW	In Accordance With
IMPAC	International Merchants Purchase Authorization Card
ISCP	Installation Spill Contingency Plan
IOSC	Installation On-Scene Coordinator
IRT	Installation Response Team
LDR	Land Disposal Restriction
LPL	Local Purchase List
LQG	Large Quantity Generator
MATES	Maintenance and Training Equipment Site
MCE	Mercury Containing Equipment
MEK	Methyl Ethyl Ketone
MIL STD	Military Standard
MNA-EC	Military and Naval Affairs – Environmental Office
MNFE	Facilities Management Engineering
MOGAS	Motor Vehicle Gas
MQCSS	Military Quality Control Storage Standard
MSDS	Material Safety Data Sheet
NAVOSHENVTRACEN	Navy Occupational Safety, Health and Environmental Training Center
NBC	Nuclear, Biological, and Chemical
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NRC	National Response Center
NSN	National Stock Number
NYARNG	New York Army National Guard
NYCRR	New York State Codes, Rules and Regulations
NY DEC	New York Department of Environmental Conservation
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDMNA	New York State Division of Military and Naval Affairs
OAP	Oil Analysis Program
OIC&C	Officer in Charge and Control
OJT	On-the-Job Training
OGS	Office of General Services
OSHA	Occupational Safety and Health Administration
OWS	Oil/Water Separator
P2	Pollution Prevention
PCB	Polychlorinated Biphenyls
Plan	Hazardous Materials and Waste Management Plan
POC	Point of Contact

POL	Petroleum, Oil, and Lubricant
PPA	Pollution Prevention Act
PPE	Personal Protective Equipment
PPM	Parts Per Million
psi	Pounds per square inch
QRP	Qualified Recycling Program
QSL	Quality Status List
RCAS	Reserve Component Automated System
RCRA	Resource Conservation and Recovery Act
SAO	State Army Aviation Officer
SAA	Satellite Accumulation Area
SDS	Safety Data Sheet
SEDRP	Strategic Environmental Research and Development Program
SLEP	Shelf Life Extension Program
SLC	Shelf Life Code
SLN	Storage Location Number
SNAP	Significant New Alternatives Policy
SOP	Standard Operating Procedure
SPCC	Spill Prevention, Control, and Countermeasures
SPS	Spill Protocol Sheet
SQG	Small Quantity Generator
SQH	Small Quantity Handler (of UW)
SSO	State Safety Office(r)
STB	Super Tropical Bleach
SWPS	Solid Waste Protocol Sheet
TAG	The Adjutant General
TM	Technical Manual
TSDf	Treatment, Storage, and Disposal Facility
UECO	Unit Environmental Compliance Officer
USP&FO	United States Property and Fiscal Office
UST	Underground Storage Tank
UW	Universal Waste
VOC	Volatile Organic Compound
WAP	Waste Accumulation Protocol
WPS	Waste Protocol Sheets