2023 Hazardous Materials Reutilization, Hazardous Waste Minimization, Management, and Disposal Guide

The purpose of this guide is to communicate regulatory requirements and management procedures relevant to the reutilization of hazardous material (HM), and the minimization, management, and disposal of hazardous waste (HW). It is your responsibility to reuse, repurpose, and/or recycle HMs whenever possible, and to notify your installation HW Program Manager (HWPM) of all wastes (existing, new, changing processes, etc.) requiring disposal. The HWPM is to be notified before the waste is generated and/or existing waste processes change.

Implementing effective environmental (EV) management, by incorporating these procedures, shows our commitment to EV stewardship through regulatory compliance, pollution prevention, and continual improvement. Understanding how your job affects the environment and what regulatory requirements apply provides for a reduction in EV impacts, ensures EV compliance through enhanced awareness, and is essential in maintaining our Environmental Management System (EMS).

Annual training is required for all personnel managing HW, and web-based training is available via Environmental, Compliance Assessment, Training, and Tracking System (ECATTS) at https://environmentaltraining.ecatts.com/. ECATTS provides an array of EV training across multiple medias.

For questions regarding HW generation, management, disposal, and/or HM reuse, please contact your installation HWPM, Point of Contact (POC) information is provided in **Appendix 1.** This guide is also referenced in the Naval Facilities Engineering Systems Command Mid-Atlantic (NAVFAC MIDLANT) Hampton Roads Port Environmental Manual (PEM) on the Afloat Compliance website, https://eims3.sscno.nmci.navy.mil/Afloat/

This guide is for the following Naval Installations in the Hampton Roads Area of Virginia Only.

Naval Station Norfolk (NSN), Naval Support Activity (NSA) Hampton Roads, Lafayette River Annex, Defense Fuel Supply Point (DFSP) Craney Island, Naval Weapons Station Yorktown (NWSY), DFSP Yorktown, NWSY Cheatham Annex (CAX), New Kent Relocatable Over-the-Horizon Radar (ROTHR), Joint Expeditionary Base Little Creek-Fort Story (JEBLCFS), St. Julien's Creek Annex, South Gate Annex, Scott Center Annex, Naval Medical Center Portsmouth (NMCP), Naval Air Station Oceana (NASO), Dam Neck Annex, NSA Northwest Annex, Fentress Air Field, and Dare County Bombing Range.

Naval Facilities Engineering Systems Command
NAVFAC MID-ATLANTIC

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References (Ensure most current version is used):

A. OPNAV-M 5090.1 Environmental Readiness Program Manual.

B. OPNAV-M 5100.23 Navy Safety and Occupational Health Manual.

C. NAVSUPGLSINST 5090.1 Naval Supply Systems Command (NAVSUP) Global Logistics Support Hazardous Material Control and Management (HMC&M) Program.

D. Naval Sea Systems Command (NAVSEA) OP5 Volume1, Seventh Revision, (NAVSEA OP5).

E. Federal Environmental Protection Agency (EPA) Regulations Title 40 Code of Federal Regulations (CFR) 260-265 (40CFR260-265) and 40CFR266-282.

F. Virginia Department of Enviromental Quality (VDEQ), Virginia Hazardous Waste Management Regulations (VHWMR) 9 Virginia Administative Code (VAC) 20-60 (9VAC20-60).

List of Acronyms

AC&R	Air Conditioning and Refrigeration
AFFF	Aqueous Film Forming Foam
APM	Asbestos Program Manager
ASD	Accumulation Start Date
AUL	Authorized Use List
AVGAS	Aviation Gasoline
BTEX	Benzene, Toluene, Ethylbenzene, and Xylene
CAA	Central Accumulation Area
CAC	Common Access Card
CBP	Customs and Border Protection
CCLI	Commerce Control List Item
CDO	Command Duty Officer
CE	Conditional Exemption
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CGC	Compressed Gas Cylinder
CHRIMP	Consolidated Hazardous Material Reutilization and Inventory Management Program
CNIC	Command, Navy Installation Command
CNO	Chief of Naval Operations
CO	Commanding Officer
DD 1348-1A	Issue Release/Receipt Document Form
DDA	Designation Disposition
DDESB	Department of Defense Explosive Safety Board
DFSP	Defense Fuel Supply Point
DLA	Defense Logistics Agency
DOD	Department of Defense
DODIC	Department of Defense Identification Code
DON	Department of the Navy
DOT	Department of Transportation
ECATTS	Environmental Compliance Assessment, Training, and Tracking System
EEBD	Emergency Escape Breathing Device
EHW	Explosive Hazardous Waste
EMS	Environmental Management System
EOD	Explosive Ordinance Disposal
EPA	Environmental Protection Agency
ESO	Explosive Safety Officer
EV	Environmental
EV Services	NAVFAC MIDLANT Environmental Services
FISC	Fleet Industrial Supply Center
FLC	Fleet Logistic Center
FLT	Fleet
FMS	Facilities Management Service
FSII	Fuel System Icing Inhibitor

GPP	Green Procurement Program
HAZMINCEN	Hazardous Material Minimization Center
HEPA	High Efficiency Particulate Air
HICSWIN	Hazardous Inventory Control System, Windows
HM	Hazardous Material
HMC&M	Hazardous Material Control and Management
HW	Hazardous Waste
HWP	Hazardous Waste Pharmaceuticals
HWPAA	Hazardous Waste Pharmaceutical Accumulation Area
HWPM	Hazardous Waste Program Manager
IHC	Interim Hazard Class
ISWM	Integrated Solid Waste Management
IWTPs	Industrial and Oily Wastewater Treatment Plants
JEBLCFS	Joint Expeditionary Base Little Creek – Fort Story
LDR	Land Disposal Restriction
LLRW	Low-Level Radioactive Waste
LQG	Large Quantity Generator
LSR	Logistic Support Representative
MDAS	Material Documented as Safe
MDEH	Material Documented as an Explosive Hazard
MEK	Methyl Ethyl Ketone
MEKP	Methyl Ethyl Ketone Peroxide
MLI	Munitions List Item
MMR	Military Munitions Rule
MOGAS	Motor Gasoline
MPPEH	Material Potentially Presenting an Explosive Hazard
MRA	Mishap Risk Assessment
NALC	Navy Ammunition Logistics Code
NAR	Notice of Ammunition Reclassification
NASO	Naval Air Station Oceana
NATEC	Naval Air Technical Data and Engineering Service Command
NAVFAC MIDLANT	Naval Facilities Engineering Systems Command Mid-Atlantic
NAVSEA	Naval Sea Systems Command
NAVSUP	Naval Supply Systems Command
NBC	Nuclear, Biological, Chemical
NeL	Navy e-Learning
NEMPU-2	Navy Environmental Preventative Medical Unit #2
NEW	Net Explosive Weight
NIINS	National Item Identification Numbers
NMCP	Naval Medical Center Portsmouth
NNSY	Norfolk Naval Shipyard
NOSSA	Naval Ordnance Safety and Security Activity
NOV	Notice of Violation
NSA	Naval Support Activity
NSN	Naval Station Norfolk
NWSY	Naval Weapons Station Yorktown
NWSY CAX	Naval Weapons Station Yorktown Cheatham Annex
OBA	Oxygenated Breathing Apparatus
OIC	Officer in Charge

ORM	Operational Risk Management
P2	Pollution Prevention
PAR	Performance Assessment Representative
PCB	Polychlorinated Biphenyl
PEM	Port Environmental Manual
POC	Point of Contact
PPE	Personnel Protective Equipment
PWD	Public Works Department
QRP	Qualified Recycling Program
RASO	Radiological Affairs Support Office
RCRA	Resource Conservation and Recovery Act
RMW	Regulated Medical Waste
ROTHR	Relocatable Over-the-Horizon Radar
RRP	Regional Recycling Program
RDT&E	Research, Development, Testing, and Evaluation
SAA	Satellite Accumulation Area
SDS	Safety Data Sheet
SQG	Small Quantity Generator
SSO	Ship Support Office
SWOB	Ship Waste Offload Barge
TCLP	Toxicity Characteristic Leaching Procedure
THF	Tetrahydrofuran
TOX	Total Organic Halogens
TPH	Total Petroleum Hydrocarbons
T-SHML	Type Ships Hazardous Material List
UW	Universal Waste
UWAA	Universal Waste Accumulation Area
UXO	Unexploded Ordnance
VDEQ	Virginia Department of Environmental Quality
VELAP	Virginia Environmental Laboratory Accreditation Program
VHWMR	Virginia Hazardous Waste Management Regulations
VIB	Virginia Industries for the Blind
VSQG	Very Small Quantity Generator
WMM	Waste Military Munition

1.0 Waste Minimization and Hazardous Material Reutilization

Reducing waste generation is the most cost-effective way to manage waste and is the responsibility of everyone within the Department of the Navy (DON). By not creating waste, an activity reduces its EV footprint, protects the environment for future generations, and helps maintain the public image of the Navy as good EV stewards. Below are Hazardous Material Minimization Center (HAZMINCEN) and Qualified Recycling Program (QRP) locations (also known as recycling centers). POCs are provided in **Appendix 1**.

1.1 HAZMINCEN Locations:

If hours are not listed, contact location for further guidance.

- NSN: Building LF-50 (Building X-218 Reuse Store).
    - NSN customers are encouraged to contact Building X-218 to confirm material availability of Reuse/SHIPR material (walk-ins are welcome).
    - Hours of operation are Monday-Friday 0700-1500 (no appointment necessary).
- NASO: Building 826.

1.2 Regional QRP Locations:

If hours are not listed, contact location for further guidance.

- NSN: Building Z-309.
- NASO: Building 934.
- JEBLCFS West: Building 3661.
    - Hours of operation: 0600-1430
- NWSY: Buildings 718 and 2024. These locations are not manned on a routine basis, contact QRP manager for arrangements.

1.3 Reduce Waste Generation

In an effort to reduce the generation of HW, users of HM should incorporate Consolidated Hazardous Material Reutilization and Inventory Management Program (CHRIMP) into business practices and their everyday work. In accordance with the Chief of Naval Operations (CNO) message dated 3 Jan 2003, all ships and shore installations are required to implement CHRIMP. All commands (ship or shore) can inquire about returning excess and unused HM to the Fleet Industrial Supply Center (FISC) HAZMINCENs. For additional guidance and information on processes, requirements, contact HAZMINCEN location listed above, POC information provided in **Appendix 1**. Below are items for your command to inquire in to assist in reducing the generation of HW:

- HM control and management: Activities should adopt procedures to manage, minimize, and control the acquisition of HM.

- HM procurement through the Reuse Store (may be available for no cost).

- Inquire if your installation has a Self-Help Center (ensure appropriate work permits are obtained).

- Can your command implement process changes; contact installation EV Department or HWPM.

- Reduce the use of solvents. Solvents can generate large volumes of HW; consider replacing solvents containing methyl ethyl ketone (MEK) (also known as 2-butanone), xylene, toluene, or other F-listed solvents with less toxic material. Contact your installation HWPM for assistance.

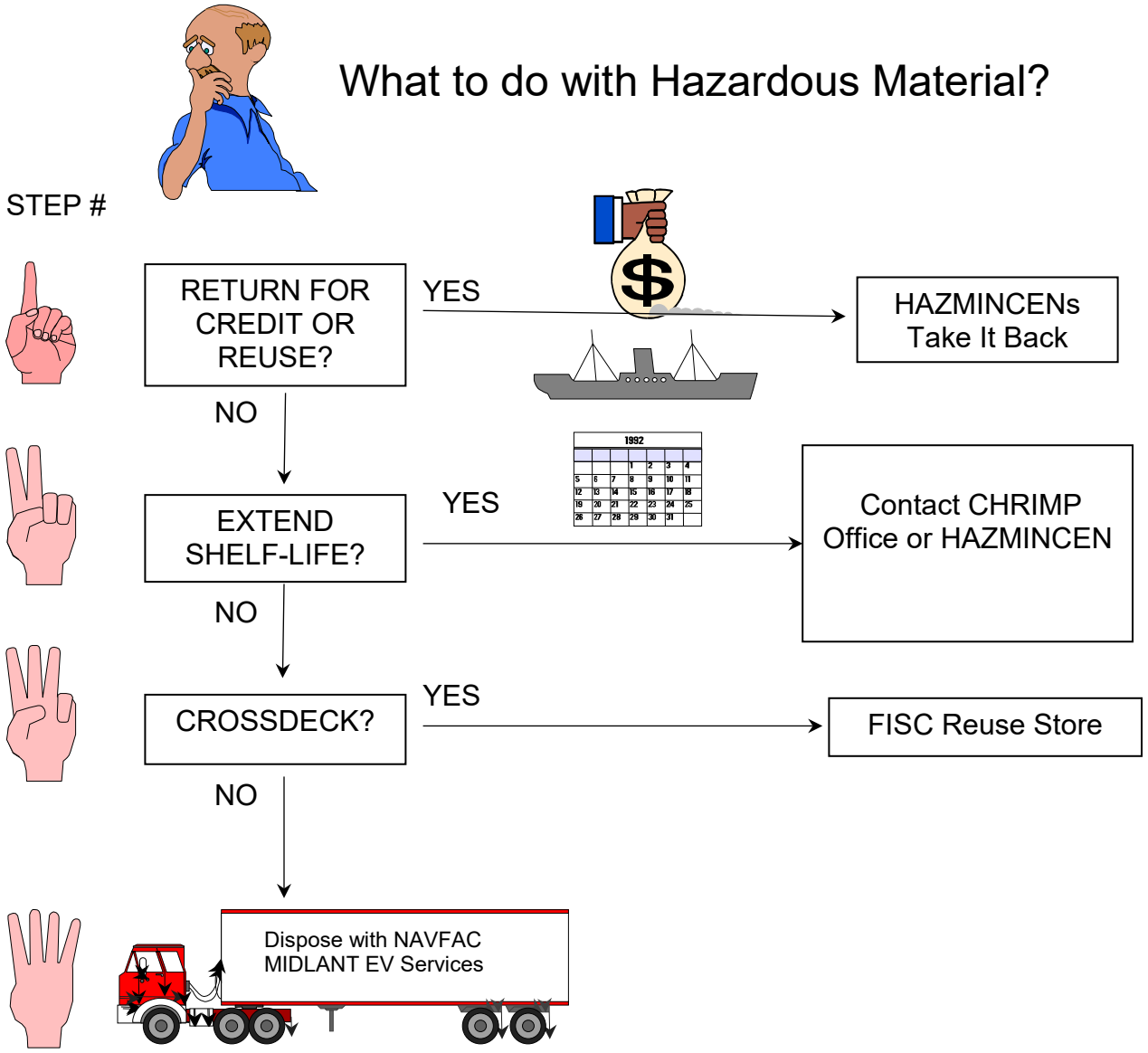
- Substitute HM with greener products to support the Green Procurement Program (GPP). The DON requires use of green products and services to the maximum extent practicable. Refer to the Defense Logistics Agency (DLA) for product catalog and information as well.

- Availability on extending the shelf-life of the HM.

- Cross-decking HM, through the Reuse Store or another tenant command. Prior to receiving HM from another tenant command or contractor, contact your Safety representative or CHRIMP Technician to ensure that the material is authorized for use, and added to your commands Authorized Use List (AUL) or Type Ships Hazardous Material List (T-SHML). Also, your Safety representative or CHRIMP Technician can assist you in obtaining a Safety Data Sheet (SDS) for the item.

- DLA Disposition Services (formerly known as the Defense Reutilization and Marketing Service [DRMO]), may accept material for resale that the HAZMINCENs cannot accept.

1.3 HM Decision Tree



NOTE

SELF TRANSPORT OF HW IS NOT PERMITTED!

Under no circumstances should tenant command personnel or any other personnel not authorized to do so transport HW. Transporting of HW is required to be coordinated with NAVFAC MIDLANT EV Services (herein referred to as EV Services). It is illegal to transport HW on public roadways without meeting the Federal, State, and Department of Transportation (DOT) regulations.

2.0 Regional Integrated Solid Waste and Recycling

Instead of disposing of an item, verify if item(s) can be recycled through the NAVFAC MIDLANT Resource Recovery and Recycling Program (RRRP), which is a QRP, herein referred to as QRP. Installation QRP manager POC information is provided in **Appendix 1**. QRP locations provided in Section 1.2.

Some items displayed in the section can be turned into DLA Disposition Services (here in referred to as DLA), POC information provided in **Appendix 1**.

2.1 QRP Turn-In

To recycle in a safe and environmentally responsible manner, we need your help when preparing for delivery to QRP. It is important that you have a clear understanding of which materials are acceptable and which are not. Contact the installation QRP manager for assistance with below requirements and any other additional information:

- What is acceptable (items collected and received may change from time to time).
- How to properly package and secure your turn-ins.
- DD1348-1A (Issue Release/Receipt Document Form) requirements.
- After-hours drop-off restrictions.

2.2 QRP Example Items

Examples below are of materials that can be recycled (this does not encompass all items; only most frequently delivered items), contact the installation QRP manager for further information on locations (see Section 1.2 above) (including potential drop-off locations) and any additional guidance. If your tenant command activities require extra 90-gallon blue recycle bins, contact QRP manager. If your tenant command requires additional recycling dumpsters (i.e. cardboard, metal, and wood) or if there are special activities/circumstances, contact your buildings Public Works Department (PWD) Facility Manager Specialist (FMS) or Performance Assessment Representative (PAR).

2.2.1 Office Materials

Office material recycling is accomplished through a mixed stream recycling method utilizing 90-gallon blue recycling bins. These bins are located in various areas of buildings on the installation. The bins are picked up on prescheduled days. The following materials are accepted in the blue recycling bins: white and colored paper; newspaper; phone books; plastic bottles; small cardboard containers; file folders; magazines; aluminum cans; envelopes.

- Glass, Styrofoam, or ordnance (i.e. expended brass, etc.) is not authorized to be placed into the 90-gallon blue bins.

2.2.2 Cardboard

Flat cardboard may be placed in dumpster's marked "Cardboard Only". No solid waste or other items (dirt, debris, trash, etc.) is authorized in cardboard dumpsters.

2.2.3 Metal Items and Metal Pallets

Metal items and pallets may be placed in dumpster's marked "Metal Only". No solid waste or other items (dirt, debris, trash, etc.) is authorized in metal dumpsters. If tenant command has a significant quantity of metal pallets, contact installation QRP manager to arrange direct turn in. Contact QRP manager to verify if any metal pallets are available for reuse.

- Wire rope or cable in lengths less than 6-feet can be placed in metal dumpsters. Wire rope greater than 6 feet can be coiled up in a tri-wall container (or other QRP authorized suitable container) and turned in at NSN QRP location. Tenant command will be responsible for container and delivering to NSN. Contact QRP manager for guidance on turning in wire rope greater than 6-feet in length.

2.2.4 Wood Items

Wood items may be placed in dumpster's marked "Wood Only". No solid waste or other items (dirt, debris, trash, etc.) is authorized in wood dumpsters.

2.2.5 Wood Pallets

Tenants are responsible for transporting the pallets, whether broken (sent out as recycled wood) or whole to a QRP location. Pallets are also available for reuse if picked up.

2.2.6 Dock (Mooring) Lines

Contact the installation QRP manager for turn in guidance and procedures (e.g. coil lines and secure to a pallet).

2.2.7 Drums (Metal or Plastic)

Contact the installation QRP manager before turning in empty drums/containers for guidance, procedures, and/or special instructions. Drums may not contain any liquid or they will be rejected.

2.2.8 Appliances

Useable appliances such as air conditioning and refrigeration (A/C&R) units, washers, and dryers may be turned in to DLA for possible resale. Contact DLA for guidance (**Appendix 1**) on turn-in requirements and other appliance items eligible for turn in.

Unserviceable appliances can be turned into QRP, contact installation QRP manager.

- Any appliance containing a refrigerant (i.e. refrigerators, air conditioners, water fountains, freezers, or any item that normally contains refrigerant), may be recycled if:
    - All remaining refrigerant has been removed and unit is certified "refrigerant-free" by a certified technician. Contact NAVFAC MIDLANT PWD maintenance or your FMS to check availability and coordinate this service. Refrigerant removal services may also be available through the Integrated Solid Waste Management (ISWM) solid waste disposal contract. For information, contact the ISWM Director for guidance (**Appendix 1**).
    - The run capacitors and start capacitors have been removed (a/c units).
    - The compressors have been removed (refrigerators and a/c units).

- All oils have been removed and properly disposed of.

2.2.9 Motor Vehicle Parts

Units must deliver their parts in government vehicles.

- Engine blocks must be drained* of all fluids; oil filters and pans must be removed.
- Transmissions must be open and drained* of all fluids.
- Rear ends must be drained* and the plate removed.

Drained fluids are required to be properly managed and recycled or disposed of, see Section 5.0 for further guidance.

2.2.10 Lead-Acid Batteries

Lead-Acid Batteries are accepted provided they meet the following restrictions:

- **Not metal encased**. In special cases metal encased lead acid batteries may be accepted by QRP depending on market conditions, contact your installation QRP manager for clarification. If not accepted, contact EV Services for proper dispositioning.
- Batteries must be in good condition (e.g. no cracks, etc.) with caps or terminal covered and securely in place. Contact the installation QRP manager for guidance on turn-in procedures (e.g. drop-off location or pick up options).
- Batteries that are cracked or damaged must be properly managed and disposed of as HW, contact your installation HWPM and EV Services for proper management and disposal guidance.

2.2.11 Toner Cartridges

Cartridges are required to be in their original box packaging, in the event original boxes are misplaced toner cartridges need to be packaged in a sealed clear plastic bag and placed into a box container to prevent powder from spilling, contact QRP manager for turn-in or pick up arrangements.

2.2.12 MDAS QRP Eligible

See **Appendix 8** for eligible MDAS items that can be dispositioned with QRP.

2.3 Items Not Acceptable to QRP

Examples below are materials that cannot be recycled with QRP, however there may be alternative recycling options and/or may have additional management/disposal requirements. Contact the installation HWPM and QRP Manager for further assistance.

- Any material containing hazardous or toxic substances, materials, or waste, including any shop rags/towels. Speedy-Dry or absorbent materials or chemicals.
- Dirt, debris, trash/waste (including yard, medical, food/food byproducts) of any kind.
- Greases and Petroleum Products or any free flowing liquids of any kind. Below (not all inclusive) products are recyclable just not with the installation QRP.

- Cooking oil/grease, efforts should be made to explore recycling options with external contract.
- Gasoline, diesel fuel, propane or other petroleum products.

- Pressurized Cylinders, see DLA turn-in options below.
- Fire Extinguishers, see Section 5.0.
- Asbestos of any kind (such as pipe insulation or surfacing materials).
- A/C&R units that are NOT certified "refrigerant free" or have run/start capacitors.
- Polychlorinated biphenyl (PCB) containing materials such as capacitors, ballasts, and transformers.
- Fluorescent or mercury vapor lights and related fixtures, this includes green tip fluorescent tubes.
- Radioactive materials or containers.
- Bedding or clothing products.
- Tires
  - Contact PWD FMS or PAR if your command requires special dumpsters for regular small vehicle tires. Big equipment vehicle tires require turn in with DLA Disposition Services.
- Lawn or plastic furniture.

2.4 DLA Turn-In Options

Items should be verified with DLA for potential material turn in prior to recycling/disposal if installation QRP will not accept. Below are links to local DLA locations:

- Richmond, Va

  https://www.dla.mil/dispositionservices/contact/findlocation/richmond/

- Norfolk, Va.

  https://www.dla.mil/dispositionservices/contact/findlocation/norfolk/

Examples below in this section are of materials that can be recycled/dispositioned (this does not encompass all items) with DLA.

2.4.1 Compressed Gas Cylinders (CGCs):

Contact your installation HWPM for additional assistance with CGCs. Below are options on dispositioning of CGCs:

- Government Owned Cylinders Turn In at NSN Cylinder Yard, Bldg. X-380.

  For government owned cylinders, contact the Cylinder Yard at Building X-380. **Commercial cylinders will not be accepted**. For all cylinder inquiries contact Mr. Oscar Tirado at 757-278-8060 or 757-705-3847 and by email at oscar.tirado@dla.mil or Mr. John Washington 757-635-4585 or john.washington@dla.mil.

- STEP 1: Customers will generate 3 copies of the DD form 1149 for each type of government owned cylinders (CO2, Nitrogen, Argon etc.) that will be turned in to DLA DDNV/X-380 for disposition. Please make sure cylinders are marked FULL or EMPTY on them. IMPORTANT: Ensure the DD1149 is filled out properly in regards to the Nomenclature, Quantity, and most importantly, the proper National Stock Number for the EMPTY cylinders being turned in. The cylinders will be transported and turned in utilizing government vehicles only. A corresponding SDS for each different National Stock Number shall be included with the DD1149. If the cylinders are not banded to a pallet/loose, the responsible party must ensure they have adequate personnel to palletize the cylinders at X-380. Pallets, chocks, and forklift assistance will be available upon turn-in. All cylinders must have securely attached CAPS or cylinders will be rejected.
- STEP 2: Customers will proceed to Emergency Services Operation Center located at Y-109 across from Pier 7, contact phone number 757-278-8407. Emergency Services Operation Center will verify the DD-1149, and stamp the 1149 for approval for turn in.
- STEP 3: Customers will then proceed to building X-380 to drop off their cylinders. To gain access to the compound ring the bell at the gate or call the X-380 office at 757-278-8525. Drop off hours are 0900–1100 and 1200–1400, Monday, Wednesday, and Friday. No appointment is required. Late afternoon turn-in after 1400 will be handled on a case-by-case basis.

- If not a Government owned CGC, contact the manufacturer/vendor to inquire in any options to send CGC back for reuse.
- If CGC cannot be dispositioned through DLA directly or manufacturer, EV Services can only dispose of CGCs through a direct pickup with DLA if the current contract supports the CGC in need of disposal. This option will be a costly. EV Services cannot directly handle or dispose of CGCs. Contact the installation HWPM to enquire if CGC is covered under existing EV Service disposal contract with DLA and costs for disposal.

2.5 Used Oil Recovery Navy Program

See Section 5.0 for recycling of used oil with EV Services.

2.6 Public Works Department (PWD) Contractor Recycling

PWD and/or Contracting Officers (or authorized representative) is advised to discuss recycling options with contractors on construction projects within the project scope. Every effort to recycle as much of the materials as possible should be made. Contractor is responsible to provide the Contracting Officer with documentation on recycled material(s) with a legitimate recycler.

3.0 HW Generation, Management, and Storage

Under the Resource Conservation and Recovery Act (RCRA), the Environmental Protection Agency (EPA) has Code of Federal Regulations (CFR) (**Reference E**) that govern HW from "cradle" (generation, management, storage, treatment, and transportation) to "grave" (disposal). The State of Virginia is an EPA authorized state to implement the RCRA HW program in lieu of EPA. The Virginia Department of Environmental Quality (VDEQ) governs the Virginia Hazardous Waste Management Regulations (VHWMR) (**Reference F**). Any HW regulation violation (e.g. noncompliance) with EPA and/or VDEQ results in a Notice of Violation (NOV) and potential civil penalties (e.g. charges). **Note - Contact the installation HWPM and/or EV Department with questions, guidance, assistance, comments, or concerns, DO NOT contact the regulatory agency**.

Installation HWPMs provide oversight to ensure compliance with EPA/VDEQ RCRA HW regulations. They also provide assistance, evaluations, technical guidance, and training (in depth one-on-one when needed) to all tenant commands and personnel (e.g. contractors, etc.) on the installation to ensure that HW is properly managed, stored, treated (if required), transported, and disposed of.

EV Services is the HW pickup, transportation, and disposal servicing agent for installations in the Hampton Roads Area. EV Services turn-in requirements (e.g. documentation, scheduling, funding, etc.) are provided in Section 4.0.

3.1 HW Determination and Generation

For a material to become a HW it must first become a solid waste (40CFR261.2). A solid waste is any discarded material that is not excluded (e.g. exempt) or has a variance from EPA/VDEQ regulations. Discarded material can be a solid, liquid, or gas that is:

- Abandoned (including disposed of, burned, sham recycled, etc.), or
- Considered inherently waste-like (including HW to be recycled), or
- A military munition.

An accurate waste determination (40CFR262.11) is required on all solid wastes generated to verify and document whether the solid waste is a HW in order to ensure proper management and disposal of the waste. An accurate waste determination must be made at the point of waste generation, **before** any dilution, mixing, or other alteration of the waste occurs. For solid wastes awaiting analytical results, or containers with unknown contents – these wastes must be managed as a HW until analytical results are received and an accurate waste determination made. When analytical testing is required to perform an accurate waste determination, EV Services provides sampling and analytical analysis services. EV Services will also document and maintain the waste profile for the waste. Contact EV Services and the installation HWPM for assistance in performing analytical sampling (see Section 4.6) and additional guidance on accurate waste determinations.

A solid waste becomes a HW when it is (below is not all-inclusive):

- Not excluded (e.g. exempt) by RCRA (40CFR261.4) (e.g. domestic sewage, recycled materials such as recovered oil, scrap metal, and used cathode ray tubes, and household waste).
- A characteristic waste (40CFR261) (determined by generator knowledge, SDS, or analytical testing). These include wastes that are:

- Ignitable (liquids flashpoint is <60°C or <140°F, and/or highly flammable solid or compressed gas),
- Corrosive (aqueous pH ≤2 or ≥12.5 and/or liquid that corrodes steel at a significant rate),
- Reactive (reacts with water, and/or unstable), or
- Toxic (list of contaminants provided in Table 1 of 40CFR261.24, (e.g. heavy metals, benzene, chlordane, chloroform, etc.).

- A listed waste (40CFR261). These include wastes (ignitable, corrosive, reactive, toxic, acute, or toxic) specifically identified in Subpart D of 40CFR261.30-261.33 (e.g. F or K-listed, U or P-listed unused commercial chemical products, etc.).

Mixtures of HW and SW are subject to additional HW regulations (e.g. mixture rule, prohibition of dilution, etc.). Contact your installation HWPM for additional information before mixing HW and SW.

The amount of all HW generated at an installation in a calendar month will determine the installations HW generator status (40CFR262.13), and each must comply with different RCRA standards. Tenant commands and/or contractors may be required to assist the installation HWPM with conducting/maintaining HW generation quantities. Below are HW generator categories based on HW generated in a calendar month:

- Very Small Quantity Generator (VSQG) generates less than 100 kilograms (220) pounds of non-acute HW and less than or equal to 1 kilogram (2.2 pounds) of acute HW.
- Small Quantity Generator (SQG) generates greater than 100 kilograms (220 pounds) but less than 1,000 (2,200 pounds) of non-acute HW, and less than or equal to 1 kilogram (2.2 pounds) of acute HW.
- Large Quantity Generator (LQG) generates greater than or equal to 1,000 kilograms (2,200 pounds) of non-acute HW, and less than or equal to 1 kilogram (2.2 pounds) of acute HW.

3.2 HW Management and Storage

If an accurate waste determination determines the waste to be a HW (includes managing waste as HW until proven otherwise by analytical testing), all HW is to be managed and stored in designated accumulation area(s). To ensure compliance, the installation HWPM must approve and establish all HW accumulation areas **prior to generating a HW**, as well as closure of the area(s) (**coordinated prior to the closure date**). In addition, the HWPM is to be informed of any issues that have the potential to affect the Navy's ability to comply with any RCRA regulations. If HM is stored in the same location as HW, ensure the areas are clearly marked to identify HM from HW.

There are three (3) main types of authorized HW accumulation areas: Satellite Accumulation Area (SAA), Central Accumulation Area (CAA), and Universal Waste Accumulation Area (UWAA). Please see Section 3.2.4 for HW Pharmaceutical Accumulation Area (HWPAA) management and requirements for installations in the Hampton Roads Area.

General requirements that apply to all SAAs, CAAs, UWAAs, and HWPAAs are listed below and additional requirements for each accumulation area are provided in subsections below.

- Good housekeeping standards must be employed at all times, keep areas neat and orderly.
- All containers must be labeled (see subsections below for detail on labels), kept closed (except when adding or removing waste), and adequate aisle spacing maintained for proper inspection and response.
- Operators must complete annual HW management training and maintain training completion documentation in their operating records.
- ECATTS training website: https://environmentaltraining.ecatts.com/. See **Appendix 7**, or contact the installation HWPM for assistance.
- Areas must be identified with legible signs as a SAA, CAA, UWAA, or HWPAA with the POCs information, NO SMOKING, and emergency response numbers.
- Emergency Preparedness and Prevention: The installation must maintain and operate to minimize the possibility of a fire, explosion, or any unplanned, sudden or non-sudden release of HW or HW constituents to air, soil, or surface water, which could threaten human health or the environment.

The installation HWPM maintains a HW Contingency Plan for installations that are LQGs that covers the location of all SAAs and CAAs, quantities, spill and emergency response procedures, etc. To view your installation's HW Contingency Plan, contact the installation HWPM. The installation HWPM will provide guidance on required emergency response equipment based on the HW generated/stored, and for LQGs, below are minimum requirements:

- Have adequate suitable spill control equipment to contain contents of the area should a spill occur (this portion applies to UWAAs as well). Adequate personal protective equipment (PPE). Spill equipment/supplies/PPE must be readily available, maintained, and inspected on a routine basis. Tenant command personnel only respond to spills if it safe to do so and properly trained. Follow spill reporting procedures in **Appendix 2** if a spill occurs.
- Areas must be equipped with emergency communication equipment/device for onsite personnel notification and ability to contact emergency responder (e.g. telephone, radios, sirens, voice box, etc.). Cell phones cannot be the only device for communication.
- A portable fire extinguisher must be readily available and inspected on monthly basis. An ABC type extinguisher is recommended. Ensure fire extinguisher(s) location is compliant with the National Fire Protection Association 10 depending on hazards stored, safe assessment is located within a 30-50 feet distance, contact the installation Fire Inspector for guidance.
- An adequate water source (e.g. water hose, foaming agent, sprinkler spray/system, etc.)

3.2.1 Satellite Accumulation Area (SAA)

There are no limits on the number of HW streams that can be accumulated; however, the **Total Volume Must NOT Exceed** 55-gallons of non-acute HW and less than or equal to 2.2 pounds of acute HW. Separate waste streams shall be stored in separate containers that must be compatible

with the waste being stored. SAA must be located at or near the point of waste generation and under control of the operator. The HWPM will determine the proper location of the SAA. If a SAA will be unattended due to unit deployment, project ending, etc., waste must be disposed of (e.g. be turned into EV Services or contracted disposal company) and the HWPM contacted to have the area closed (please provide 1-2 weeks advanced noticed if possible).

3.2.1.1 SAA management requirements are:

- General requirements listed above.
- Containers must be labeled/marked with:
  - The words "Hazardous Waste",
  - Contents in the container, and
  - A DOT hazard class label to indicate the hazards of the container (e.g. Class 2 Flammable Gas, Class 9 miscellaneous, Class 6 Poison, etc.).
    - If a class 9 DOT label is used you must write the word "Toxic Characteristic" on or underneath the label.
- The container does not require an accumulation start date (ASD), however, if a container becomes full, it must be dated immediately (the date it becomes full), and moved to an approved CAA, permitted facility (if applicable), or disposed of within 72 hours (3 consecutive days). If the container is picked up prior to container being full, the container is required to be dated the day of pick-up to be moved to a CAA or disposed of (or moved to a permitted facility if applicable).

3.2.1.2 SAA Inspections

The checklist included in **Appendix 3** provides a concise listing of the regulatory requirements of a SAA. It is **highly recommended** that inspections of SAA(s) are conducted at least weekly by tenant command, using the checklist. The Installation EV Department or HWPM will perform SAA inspections on a routine basis to provide technical support, management guidance, and oversight.

3.2.2 Central Accumulation Area (CAA)

A CAA allows for HW storage (unlimited capacity), however, depending on the installations generator status (contact your installation HWPM for proper generator status) there is a time limit on HW storage:

- LQG can store HW up to 90-days.
- SQG can store HW up to 180-days.
  - If the SQG has to transport the HW to a disposal facility that has a distance of 200 miles or greater, then the SQG can store HW up to 270-days. Contact the installation HWPM if this is required.
- VSQG contact your installation HWPM prior to generating HW of volume/quantity that would require a CAA.

Advance notice is required to the HWPM at least 2 weeks (or more if possible) prior to the need for a CAA set-up to allow for waste evaluation, training, coordination, etc. The HWPM is required to notify VDEQ (VHWMR requirement) when CAAs are opened.

3.2.2.1 CAA management requirements are:

- General requirements listed above.
- Containers must be labeled/marked with:
- The words "Hazardous Waste",
- Contents in the container,
- Accumulation Start Date (ASD), which is the date of when waste is first placed into the container, and
- A DOT hazard class label to indicate the hazards of the container (e.g. Class 2 Flammable, Class 9 miscellaneous, Class 6 Poison, etc.).
- If a class 9 DOT label is used you must write the word "Toxic Characteristic" on or underneath the label.
    - CAA must be inspected weekly (once every seven [7] calendar days), see below for further details.
    - LQGs have **90-days** to dispose of HW in a CAA. This time includes EV Service's (or contractor) disposal processes (documentation, scheduling, etc.). In order to have HW fully processed prior to 90-days, at **day 45-50 (may vary, verify with installation HWPM)** from the ASD, submit a service ticket with EV Services (see below section for details), or coordinate with contractor (if this applies) to advise of 90-day limit date and schedule a HW picked up for disposal. If HW is not picked up within 14-days of service ticket submission, contact EV Services immediately. **DO NOT** allow the HW to exceed 90-days. Contact the installation HWPM with any disposal issues, concerns, or emergency.
    - Provide advance notice (at least 2 weeks or more if possible) to the HWPM prior to the need for CAA closure. The HWPM is required to ensure the CAA meets closure requirements and notify EPA.

3.2.2.2 CAA Inspections

Tenant command CAA operators, must perform and document an inspection of their site weekly (once every seven [7] calendar days). The inspection records must be available at all times and maintained for a minimum of three (3) years. The inspection is to be documented using the CAA checklist that is included in **Appendix 4**. The checklist provides a concise listing of the regulatory requirements of a CAA.

Any deficiency/violation must be corrected as soon as practicable or possible. Deficiency corrections must be noted on the inspection sheet in the space provided. Corrective action taken, date accomplished, and initials of person performing corrective actions must also be recorded. If at any time, the operator cannot complete a weekly inspection (e.g. inclement weather, or other emergency circumstance) contact the installation HWPM immediately.

The Installation EV Department and/or HWPM will perform CAA inspections on a routine basis to provide technical support, management guidance, and regulatory oversight.

3.2.3 Universal Waste Accumulation Area (UWAA)

EPA established alternative management standards for Universal Waste (UW). UW regulations (40CFR273) applies to four (4) types of widely generated HW: batteries (e.g. lithium-ion, nickel-cadmium, mercury, lithium sulfur dioxide, magnesium dioxide, etc.), pesticides (not all pesticides are a UW, contact installation HWPM and/or EV Services), mercury-containing equipment, and lamps (e.g. fluorescent light bulbs [see below], etc.).

Not all batteries are a UW, Alkaline batteries (double and triple As, Cs, and Ds) are a solid waste. Tenant commands can research recycling facilities if they choose. Lead-acid batteries are required to be recycled (e.g. with installation QRP).

Fluorescent lamps/bulbs (including "green-tip", because low levels of mercury are still present), high-pressure sodium, and metal halide are to be managed as UW. VDEQ has stringent requirements for lamp/bulb crushing; therefore, crushing is **NOT AUTHORIZED**.

3.2.3.1 UWAA management requirements are:

- General requirements list above.
- Containers must be labeled with the words "UNIVERSAL WASTE", contents of the container, and the ASD of when the waste is placed in the container (**only allowed to store UW for 1-year**).
- Provide at least a 14-day advance notice to the HWPM to allow time for set up of the UWAA. For closure of a UWAA, contact the HWPM at least 14-days prior to the planned closure date.

3.2.3.2 UWAA Inspections

The checklist included in **Appendix 5** provides a concise listing of the regulatory requirements of a UWAA. It is **highly recommended** that inspections of UWAA(s) are conducted at least monthly by tenant commands, using the checklist. The Installation EV Department or HWPM will perform UWAA inspections on a routine basis to provide technical support, management guidance, and oversight.

3.2.3.3 UW Disposal Process:

At or before **270 days of accumulation (9 months)**, prior to expiration of the 1-year accumulation period, contact EV Services to schedule a pickup of the waste for disposal.

3.2.4 Hazardous Waste Pharmaceutical Accumulation Area (HWPAA)

EPA issued new regulations (40CFR266 Subpart P) for the management of HW pharmaceuticals (HWP) (known as the "Pharmaceutical Rule"). VDEQ adopted the new regulations into the VHWMR. A pharmaceutical is any drug or dietary supplement for use by humans or other animals; any electronic nicotine delivery system (*e.g.,* electronic cigarette or vaping pen); or any liquid nicotine (e-liquid). HWPs were broken into 3 categories:

- Potentially-Creditable HWP: A HWP that has a reasonable expectation to receive manufacturer credit that is:
    - In original manufacturer packaging unless it was subject to a recall;
    - Undispensed; and
    - Unexpired or less than one year past the expiration date
- Non-Creditable HWP: A HWP with no reasonable expectation of being eligible for manufacturer credit.
- Evaluated HWP: A HWP that has been evaluated by a Reverse Distributor and will not be sent to another Reverse Distributor for further evaluation

If pharmaceuticals are part of a tenant commands activity, the tenant command is required to contact the installation HWPM to review processes and inventory to ensure pharmaceuticals are properly managed and disposed. NMCP also oversees pharmaceuticals at installation clinics in the Hampton Roads Area. The installations in the Hampton Roads Area have established HWPAA requirements for the disposal of non-creditable HWPs.

3.2.4.1 HWPAA Specific Requirements:

- Container is structurally sound, compatible with its contents, and closed/secured to prevent unauthorized access.
- Container must be clearly labeled with the words "Hazardous Waste Pharmaceuticals", and an ASD (**1-year storage limit**).
    - The Navy prefers that tenant commands date their containers, however, maintaining an inventory system that identifies the date the HWP became a waste is also acceptable. The installation HWPM must approve the use of the inventory system.
    - The Navy also prefers to have contents displayed on the container or maintaining a log sheet that lists the HWPs in the container as a best management practice.
    - Please ensure that HWPs placed into one container are compatible to avoid any potential reactions inside the container.
- Have adequate suitable spill control equipment in the event of a spill.
- Complete NMCP Pharmaceutical Waste Management and Management of Controlled Substances Training in ECATTS in addition to the regular HW Management Training.

3.2.4.2 HWPAA Inspections

The checklist included in **Appendix 6** provides a concise listing of the regulatory requirements of a HWPAA. It is **highly recommended** that inspections of HWPAA(s) are conducted at least monthly by tenant command, using the checklist. The Installation EV Department or HWPM will perform HWPAA inspections on a routine basis to provide technical support, management guidance, and oversight.

3.2.4.3 HWPAA Disposal Process:

HWPs can only be stored for 1-year (365-days) from the ASD. In order to have HWPs disposed of prior to the 1-year limit, at 9-months from the ASD, begin coordinating and scheduling for disposal (documentation prep, pickup date, etc.). Contact the installation HWPM for disposal process requirements. EV Services or the NMCP contractor may complete transportation and disposal.

3.3 PWD Contractor Projects

The installation PWD is responsible for contacting the installation HWPM to discuss waste that may be generated on construction projects during the scope of work development and pre-construction phases. If the construction contractor will generate a HW (or may potentially generate) on the project, all above requirements in this section apply to the contractor as well. Contractor will be responsible for all documented accurate waste determinations (including accurate analytical testing) and proper management of all waste generated on site. All above requirements is to be coordinated with the installation HWPM.

4.0 Waste and HM Turn-In, Transportation and Disposal Guidance

EV Services is the Navy's authorized organization that is responsible for providing multiple different services (e.g. sampling, waste profiling, waste transportation, waste disposal, documentation control, etc.) to shore and afloat tenant commands for the Naval installations in the Hampton Roads Area. Contact EV Services (**Appendix 1),** for any questions or assistance on turning in any waste or services needed.

Contractor(s) on installation PWD or tenant command construction projects are responsible for all disposal of waste(s) generated on the project and ensuring that an accurate waste determination is made for proper dispositioning (i.e. hazardous, non-hazardous, etc.). Contractor is required to submit a documented accurate waste determination (e.g. waste profile, letter, etc.) to the Contracting Officer (or approved representative) for submission to EV Services (including installation HWMM on correspondence) for review and signature. EV Services is also required to review and sign all waste transportation and disposal documentation (e.g. Uniform HW Manifest, non-hazardous manifest, bill of lading, etc.).

For Contractor(s) HW transportation and disposal, EV Services representative is required to be on site the day of shipment to sign Uniform HW manifest and Land Disposal Restrictions (LDR), therefore, the contractor is responsible to coordinate waste pickup schedule with the Contracting Officer and EV Services at least 14-days prior to pick up schedule. Coordination for all review(s) and signature(s) for waste disposal documentation can be coordinated through the construction Contracting Officer (or approved representative) and/or the installation HWMM.

4.1 HW Transportation

EV Services provides HW pick up at CAAs, SAAs, UWAAs, and other specified locations (e.g. materials to turn in for disposal/disposition, etc.) on all installations and Fleet (FLT) activities here in the Hampton Roads Area.

HW must be properly packaged in the original or a DOT approved container. If tenant commands or installation personnel have direct specific questions regarding container availability and packing requirements, please contact EV Services or installation HWPM.

NOTE

Only EV Services (or authorized contractor) is permitted to transport HW on/off and around an installation onto open public roads under any circumstances. It is illegal to transport HW on public roadways without meeting requirements mandated by EPA and DOT (e.g. proper certifications or licenses and shipping documentation).

Contractor(s) on installation PWD or tenant command construction projects are responsible for coordinating all transportation and disposal of waste(s) generated on the project. Coordination for all review(s) and signature(s) for waste transportation and disposal documentation can be coordinated through the construction Contracting Officer (or approved representative) and/or the installation HWPM.

4.2 Funding Request Procedures

Tenant commands that are not Commander, Navy Installation Command (CNIC) commands are required to submit funding documents to NAVFAC MIDLANT for waste disposal/disposition

(e.g. HW, non-hazardous, materials, sampling, etc.) with EV Services. In order to establish a new funding document, tenants can email FWF_ML_CORE_EV@navy.mil and CC: patricia.l.wood.civ@us.navy.mil noting HW Funding in the subject line. Contact installation HWPM for assistance and guidance. Due to personnel changes after issuance of this guide, contact EV Service to verify current correct contact POC.

NOTE

HW can be turned in if funding is not available and the tenant command is awaiting funding document processing. Tenant commands should immediately contact HWPM and EV Services to arrange HW pickup in order to prevent exceeding HW accumulation timeframes that can result in regulatory non-compliance violations.

Contractor(s) on installation PWD or tenant command construction projects are responsible for funding all transportation and disposal of waste(s) generated on the project. Contractor(s) are to contact their Contracting Officer (or approved representative) and/or the installation HWPM for questions.

4.3 Material/Waste Turn-In Procedures/Documentation Requirements – Shore Tenant Commands

- Four (4) completed copies (or quantity designated by EV Services) of the DD 1348-1A, or 1348-1 created in Hazardous Inventory Control System, Windows (HICSWIN) or printed, are required for turn-in of unusable HM or HW to EV Services unless otherwise directed by EV Services.
    - Minimal information to provide:
        - Tenant command information (name, UIC, etc.)
        - Waste to be turned in and approximate quantities
- Contact the EV Services Service Desk at 757-341-0460/0412 to submit a verbal request. For those tenant commands with fax capabilities, a copy of the DD-1348 can be faxed to 757-341-0436 as well to follow the verbal submittal to ensure prompt service.
- All four (4) copies of the DD 1348 are required at time of pickup unless otherwise directed by EV Services. Copies are distributed as follows: client, EV Services driver, on the container, and returned to FISC (if applicable).
- For material that was not procured through the Navy stock system, a SDS is required.

4.4 Material/Waste Turn-In Procedures/Documentation Requirements – Ships/Fleet Activities

Contact EV Services (**Appendix 1**) to verify all procedures and protocols below apply.

- All ships ported in the Hampton Roads area are advised to follow the Port Environmental Manual (PEM) for guidance on how to maintain compliance while in port. The PEM can be found at https://eims3.sscno.nmci.navy.mil/afloat/. The PEM does not replace installation requirements. It includes port-specific information based on the installation where a ship is ported.

- Ships in local private shipyards will be provided with a CHRIMP Office POC to call to schedule a HM/HW pickup. Contact the CHRIMP Office to initiate this action for you. Only CHRIMP Technicians are authorized to contact EV Services to schedule a pickup of the waste. Allow adequate time for waste screening and quality control for CHRIMP and EV Services. After notifying the CHRIMP Office and a pickup is scheduled, notify the MARMC Environmental Protection Specialist assigned to the local private shipyard with the details of the pickup date and time of when EV services will arrive.
- Ships at Norfolk Naval Shipyard (NNSY): contact the NNSY Occupation, Safety, Health, and EV Office (Code 106), for assistance with HW disposal.
- Ships at NWSY: Offloads are not conducted at NWSY, however, for any unforeseen emergent circumstance, contact EV Services for guidance and prior approval for an offload.
- Ships at NSN (4 pallets or less) or JEBLCFS (2 pallets or less): EV Services offers several HW pickup points on the piers. The specific piers and pickup times are listed below. Each ship is to contact and coordinate with their assigned CHRIMP Technician. A representative from the ship must accompany the HW from the time it leaves the ship to the time it is picked-up by EV Services. **Under no circumstances shall waste be left unattended or abandoned on piers.**

NSN Pier pickup schedule is: Monday – Friday

0800-0915	Pier 3	
0800-0915	Pier 4	*4 pallets or less*
1000-1115	Pier 9	
1000-1115	Pier 12	

JEBLCFS Pier pickup schedule is: Tuesday and Thursday

0800-0900	Pier 15	
1000-1100	Quaywall	*2 pallets or less*

- Ships at NSN (more than 4 pallets) or JEBLCFS (more than 2 pallets) must request and turn-in through the CHRIMP Office, the Logistics Support Representative (LSR) or the FISC representative. Once informed of a request for off-load, the CHRIMP Technician will screen the material and determine what is still usable and what is waste. The CHRIMP Technician and EV Services representatives will then coordinate the off-load. A representative from the ship must accompany the waste until it is picked up by the EV Services. Under no circumstances shall waste be left unattended or abandoned on the piers. If possible, for large offloads, ships should utilize the pier pickup option over the course of several days instead of scheduling an offload. For special pickups, Logistic Support Representative (LSR) or FISC Hazmat representatives do not screen unless it is known ahead of time and special arrangements are made, otherwise, call for special pickups.

NOTE

It is a violation of state and federal law to abandon HM/HW. No HW is to be transported from a different installation to a scheduled pier pickups. Pier pickups are for ships at that pier only.

4.5 Waste Dumpster Request

In order to request a roll-off box (non-haz or HW), HWPMs and/or tenant commands can contact the EV Services Customer Service (**Appendix 1**) providing a funding General Ledger (GL) Account number (funding number for Non-CNIC reimbursable customer), size of roll-off box needed, location needed, and description/type of waste that will be going into the roll-off box. Tenant commands should not be ordering HW roll-off box without contacting your installation HWPM. For normal solid waste (trash) dumpsters, contact your installation PWD PAR.

4.6 Analytical Sampling Request

In order to request analytical sampling, HWPMs and/or tenant commands can contact EV Services Customer Service (**Appendix 1**). Information to provide the service desk: description of the sample, location, testing required, and a point of contact with phone number. HWPMs and/or tenant commands should inform the service desk if the sampling needed is **urgent**. If it is a reimbursable customer (non-CNIC), a GL account number will need to be provided and/or established (see Section 4.2. above). Once EV Services processes the request and generates a ticket, the customer will be contacted by the laboratory to schedule a time to collect the sample and clarify any questions about the request. In case of emergency or after hour's requests, tenant commands should contact the command duty officer (CDO). The CDO will contact EV Services' Director, who will notify laboratory personnel of the situation. EV services utilizes a laboratory that is Virginia Environmental Laboratory Accreditation Program (VELAP).

5.0 Guidance for Common and Specific Waste Streams

Below are examples of wastes that have been generated at installations in the Hampton Roads Area and requirements and/or options in proper management/disposition. Please refer to prior sections for HW management requirements. Contact your installation HWPM for any questions, activity and HM use reviews, assistance, technical guidance, etc.

EV Services is the Navy's authorized organization that is responsible for providing multiple different services (e.g. sampling, waste profiling, waste transportation, waste disposal, documentation control, etc.) to shore and afloat tenant commands for the Naval installations in the Hampton Roads Area. Contact EV Services (**Appendix 1**), for any questions or assistance on turning in any waste or services needed.

NOTE

Bagged waste (no free liquids) will only be accepted for pick-up in clear bags. Red or yellow bags shall never be used.

5.1 Absorbent Material

Ensure that absorbent material available for use is a green product and there are no hazardous constituents (this is highly unlikely but needs to be verified).

- If the absorbent material was used to absorb HW, it must be managed/disposed of as a HW.
- If the absorbent material was used to absorb HM, it must be managed as a HW until an accurate waste determination can be performed for proper disposal.
- If the absorbent material has been used to absorb oil, and there is no free flowing liquid, the absorbent material can be placed in clear plastic bags, then containerized, and turned in to the EV Services. Contact installation HWPM for additional guidance and verify disposal with EV Services.

5.2 Aerosol Cans

VDEQ adopted EPAs 2018 updated rule "Increasing Recycling: Adding Aerosol cans to UW Regulations". This adoption will take effective in Virginia on 18 January 2023, and allows un-punctured aerosol cans to be managed and disposed as UW. The Rule will allow three (3) options for managing spent aerosol cans (see further discussion in subsections):

- Continue to manage aerosol cans as HW under 40 CFR Part 262;
- Puncture aerosol cans using a commercial puncturing device, and recycle the punctured cans as scrap metal (mandatory) and characterize and manage the drained liquids as HW if appropriate; or
- Manage un-punctured aerosol cans as UW under 40 CFR Part 273.

5.2.1 Punctured Aerosol Cans

The aerosol can puncture device must be approved by the installation HWPM. There were a few additional requirements added if puncturing aerosol cans:

- Puncturing of aerosol cans is only allowed if the cans will be **recycled** as scrap metal, they can be placed in metal recycling containers/dumpsters.
- Written procedures (e.g. standard operating procedures) will be required to address and provide procedures for operating puncturing device, PPE, required maintenance on the puncture device, recycling the cans, segregation of incompatible wastes, management of any drained liquids, training documentation, and any other information the tenant command or HWPM require.
- Documented training for personnel operating the puncture device. On the job training is required to be conducted by the owner of the puncture device (e.g. tenant commands, etc.) and documented for any personnel operating the puncture device.

The owner of the puncture device (e.g. tenant command, etc.) is responsible for ensuring that written procedures are developed and followed, operators are trained (operating and maintenance), and recycling of cans. The contents/drained liquid (obtain from the SDSs) of the aerosol cans to be punctured must be compatible and managed as a HW (if appropriate). Contact the installation HWPM to receive approval on puncture device and establish the SAA prior to setting up the puncturing device to ensure that all requirements are met.

NOTE

Aerosol cans containing corrosives, Freon, pesticides, insecticides, fungicides, chlorofluorocarbons (CFCs), or oven cleaners shall not be punctured and are required to be collected separately as un-punctured. Prior to puncturing any and all aerosol cans, ensure compatibility of contents in the container prior to puncturing.

5.2.2 Un-punctured Aerosol Cans

Aerosol cans that cannot be properly punctured can be managed as either HW or UW. Contact the installation HWPM to establish the appropriate HW or UW accumulation area. Prior to placing aerosol cans into a container, remove the spray nozzle and put the protective cap back on (if present).

5.3 Antifreeze

Antifreeze is a non-HW, containerize separately (do not mix with any other materials, e.g. solvents, used oil, etc.), and dispose/recycle with EV Services. Mixing antifreeze with any other materials will render the antifreeze as non-recyclable and could potentially make the mixture a HW.

5.4 Appliances/White Goods (A/C&R Equipment)

See Section 2.0.

5.5 Aqueous Film Forming Foam (AFFF)

Contact your installation HWPM and EV Services for turn in guidance.

5.6 Asbestos

Contact the installation Asbestos Program Manager (APM) for disposal guidance (APMs are part of PWD). All asbestos removal (e.g. pipes, building, roofs, floors, etc.) is required to be

reviewed/approved by the installation APM to ensure proper procedures are followed and regulatory notifications are made prior to asbestos removal activity. EV Services is required to review, approve, and sign all asbestos waste disposal documentation (e.g. waste profiles, manifests, etc.).

EV Services does provide small-scale asbestos removal. Contact EV Services for procedures, funding, and scheduling information.

If you are unsure if you are dealing with asbestos (i.e. safes, filing cabinets, etc.), contact your installation APM for further guidance.

5.7 Batteries

All batteries are not managed in the same manner. Below are the specific disposal guidelines.

- Alkaline Batteries: Alkaline batteries such as AAA, AA, C, and D batteries can be disposed of as normal trash.
- Lead acid batteries: Lead acid batteries (car type), non-leaking, shall be turned into QRP.
- Rechargeable batteries: Nickel Metal Hydride, Nickel Cadmium, Lithium Ion, and Nickel Zinc, Mercury, Lithium Sulfur Dioxide, Magnesium Dioxide, and 6-volt Lantern Batteries shall be managed as Universal Waste. Contact your HWPM to set up a Universal Waste Accumulation Area.
- All batteries must be packaged to prevent shorting, (i.e. one (1) battery to one (1) Ziploc bag and/or terminals taped over). For 6-volt Lantern Batteries, each battery is required to have terminals protected with heavy-duty or electrical tape (double layered), and placed back in manufacturers box or double bagged using 2-mil thick plastic. Contact EV Services to schedule a pickup.

5.8 Bondcote Tent Disposal

Disposal of Bondcote Tents will go through DLA, POC is provided in **Appendix 1**.

5.9 Construction and Demolition Debris

The Navy is responsible (and ultimately liable for any violations) to ensure that ALL waste generated on a construction project, including contractor generated waste, is properly characterized, managed, and dispositioned to a properly permitted disposal facility.

Common construction and demolition debris (concrete, asphalt, metals, etc.) that can be recycled with a legitimate recycler is highly advised on all construction projects. Construction and demolition waste, which potentially contains lead, asbestos, and/or other regulated waste, requires an accurate waste determination with representative sample(s) prior to generating the debris/waste. If an accurate waste determination cannot be made prior to generation, construction and demolition debris is required to be managed as a HW until an accurate documented waste determination can be completed.

Contact the installation HWPM for specific guidance and requirements during the planning phase to ensure projected wastes are evaluated and proper disposal is planned. Contact the installation HWPM during pre-construction and/or project kick-off to establish/schedule proper HW management, accumulation area(s) location(s), and disposal procedures. EV Services is required to review, approve, and sign ALL disposal documentation (including non-HW or asbestos shipping papers, etc.). No contractor or any other personnel is authorized to sign disposal documentation on behalf of the Navy.

5.10 Calcium Hypochlorite and Sodium Hypochlorite

Contact EV Services for guidance on packaging and disposal immediately.

These are highly unstable (i.e., strong oxidizers) and corrosive chemicals. There have been several instances when improper storage and handling of these chemicals has resulted in fires. In addition, exposure can cause extreme damage to the skin and eyes. Handle Hypochlorite materials carefully. Do not allow these containers or any packaging material to become wet. Store material in compatible containers secured off the ground to avoid contact with a wet floor. Do not allow these chemicals to encounter combustibles (e.g. swept material from the floor, oily rags, etc.). Inspect containers for any physical defects or damage. If the container integrity is compromised, contact EV Services immediately for repackaging and disposal.

If these materials cannot be used for their intended purpose and require disposal, these would be a HW and require management and disposing as such.

5.11 Contractor Projects

Contractor(s) on installation PWD construction projects are responsible for all disposal of waste(s) generated on the project and ensuring that an accurate waste determination is made for proper dispositioning (i.e. hazardous, non-hazardous, etc.). Contractor is required to submit a documented accurate waste determination (e.g. waste profile, letter, etc.) to the Contracting Officer (or approved representative) for submission to EV Services (including installation HWPM on correspondence) for review and signature. EV Services is also required to review and sign all waste transportation and disposal documentation (e.g. Uniform HW Manifest, non-hazardous manifest, bill of lading, etc.). For HW transportation and disposal, EV Services representative is required to be on site the day of shipment to sign Uniform HW manifest and LDR, therefore, the contractor is responsible to coordinate waste pickup schedule with the Contracting Officer and EV Services at least 14-days prior to pick up schedule. Coordination for all review(s) and signature(s) for waste disposal documentation can be coordinated through the construction Contracting Officer (or approved representative) and/or the installation HWMM.

5.12 Cooking Oil

Used cooking oil/grease can be recycled. Do not mix HM (i.e. solvents/paints) with cooking oil or grease. Do not dispose of cooking oil or grease in solid waste (“trash”) dumpsters or any sanitary/storm sewer system drains.

At NSN there are five (5) 275-gallon containers available for the collection of used cooking oil/grease. The containers are located at the heads of Piers 2, 6, 8, 10 and 14. The collection containers are located near the solid waste and metal only dumpsters. *Do not store pallets of cooking oil against buildings;

instead store them near the dumpster(s). If questions exist regarding the use of these containers, contact the HWPM.

At JEBLCFS, cooking oils should be managed in pier-side containers located at the head of pier 16 and the east quay wall. This is for vessel use only; all others shall dispose of cooking oils via EV Services. Cooking grease and fats shall be turned into EV Services for proper disposal.

5.13 Creosote Timbers

Creosote (an oily coal tar distillation by-product) has historically been used in commercial wood preservatives for railroad ties, utility poles, marine pilings, and other materials to provide long-term protection against pests and rotting. As weathering of the wood occurs, creosote can slowly release into the environment over time and contaminate soil and water. VDEQ considers creosote poles, pilings, and railroad ties as a specialty waste and maintains a list (link below or go to VDEQ website) of Virginia landfills permitted to accept these wastes,

https://www.deq.virginia.gov/home/showpublisheddocument?id=4475. Contact the installation HWPM if the VDEQ approved landfills cannot be used or if you need further guidance.

Creosote treated wood, as well as any other treated wood, should never be burned because the smoke and ash could contain toxic chemicals that pose an inhalation hazard and health risk.

5.14 Cylinders – (CGC)

See Section 2.0.

5.15 Desiccants

5.15.1 Desiccants For Non-Explosive Activities

Desiccants used in non-explosive regular shipping and storage activities may be disposed of as normal solid waste unless contaminated, contact your HWPM for disposal requirements.

5.15.2 Desiccants for Explosive Activities

See Appendix 8.

5.16 Electronic Wastes (E-Wastes)

Electronics (e.g. computers/laptops, computer equipment, monitors, printers, phones, radios, tv's, etc.) may contain hazardous substances (e.g. lead, mercury, nickel, zinc, chromium, cadmium, beryllium, etc.), and also may contain precious metals. When Government owned electronics have reached their life span or just not needed anymore, disposition them with DLA. DLA evaluates electronics for reuse, repurpose, resale, and recycling. Contact DLA for procedures, required turn-in documentation (e.g. 1348/2500 forms, etc.), and scheduling to turn-in Government owned electronics. DLA reference website, https://www.dla.mil/DDSR/. Contact the installation HWPM for guidance if DLA rejects an electronic item for turn-in. Contact Navy Marine Corps Intranet (NMCI) (1-866-843-6624) to ensure equipment is not NMCI issued prior to turn with DLA.

5.17 Explosive Hazardous Wastes

See Appendix 8.

5.18 Fire Extinguishers

EV Services can only dispose of CGCs (including fire extinguishers) through a direct pickup with DLA, which can become costly. Tenant commands are to explore recertifying existing extinguishers and recycling options below with the Virginia Industry for the Blind (VIB). Navy Region Fire Department has implemented a fire extinguisher recycling program with VIB at NASO and NSN that allows for 1-to-1 exchanges of fire extinguishers with credit given for fire extinguishers turned in. For additional information, contact VIB's customer service at (855) 842-7867 ext 4 or customerservice@vibonline.org.

Tenant commands can also contact DLA Aviation located in Richmond, Virginia to explore the option of potentially turning fire extinguisher(s) into them.

*Please note: As of December 2022, NAVSUP has not resumed collection of used fire extinguishers at the installations due to a significant backlog of fire extinguishers at NAVSUP (Building LF-50) due to COVID. Please contact your HWPM for assistance.

5.19 Flares

Tenant commands can contact the installation HWPM for assistance on the disposition of flares and smoke signals. NOSSA DDA can assist the tenant command and HWPM with the dispositioning of these items. Tenant commands can also contact Letterkenny Munition Center (Army Depot) located in Pennsylvania to obtain procedures and requirements for disposition to their facility.

5.20 Fluorescent/Other Light Bulbs

Bulb Crushing is NOT AN AUTHORIZED activity unless following new stringent VDEQ requirements. Please contact your HWPM for guidance. Fluorescent light bulbs (green-tip* and silver-tip), compact fluorescent bulbs, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide bulbs are to be managed as UW. Low mercury bulbs, often referred to as "Green tip" bulbs still contain low levels of mercury and shall be managed as UW. Please contact your HWPM for guidance.

- JEBLCFS Guidance:
    - All tube fluorescent light bulbs will be turned into the Self-Help Facility (one for one exchange) or managed as a UW. All other bulbs shall be managed as a UW and then turned in via DD 1348-1A to the EV Services.
    - EV Services no longer is sending an employee over on Tuesdays to collect bulbs, the tenant command is required to submit a ticket or DD 1348-1A for pickup. Contact EV services customer service desk (**Appendix 1**).
- Afloat commands turn in via pier-side pickup.

Non-PCB and PCB-containing fluorescent light ballasts are to be turned into EV Services as PCB waste. To schedule a pickup, contact EV Services customer service desk (**Appendix 1**).

NOTE

Fluorescent light ballasts that do not possess the marking "PCB free" are to be assumed to contain PCBs and should be managed accordingly.

5.21 Fuel Filters (Oil, JP-5, JP-8, Diesel and Gasoline)

- Gasoline and JP-8 filters are required to be managed/disposed of as a HW. Contact the installation HWPM prior to generating the waste to set up an appropriate HW accumulation area.
- JP-5, Diesel, and other Oil Filters
    - Drain for a minimum of 72 hours to remove liquids (when cold draining filters, puncturing the top can aids in removing oil from the filter).
    - Double bag drained filters in clear plastic bags (no more than ten [10] in one [1] bag), and place into solid waste (trash) container or turn into EV Services.
        - Properly drained filters can also be crushed prior to placing into clear plastic bag.

5.22 HEPA Filters

Vacuum systems that require the use of High Efficiency Particulate Air (HEPA) filters should be evaluated for the content being processed in the system and contamination of the HEPA filter by the installation HWPM to ensure proper management and disposal of contents and filters prior to generating the waste. Examples of these systems are:

- Indoor firing ranges (contents and filter may contain lead and/or other particulates).
- Sanding and/or blasting activities where there may be residual dust particles.
- Floors inside warehouses and maintenance buildings.

5.23 Industrial Wastewater

Depending on the wastewater characteristics and facility permit requirements, some wastewaters may be treated at the Navy's Industrial and Oily Wastewater Treatment Plants (IWTPs) or will have to be disposed of with EV Service. Do not mix industrial wastewater with any other wastes. For more information and assistance in disposing of industrial wastewaters contact your installation HWPM for coordination with the installation Water Program Manager.

5.24 Leather Items

Leather materials generated from activities occurring in maintenance and welding shops, laboratories, and aboard ships shall be managed as HW and turned into EV Services for proper disposal. This includes but is not limited to: leather gloves, boots, and other various PPE. Should an installation tenant or command require an accumulation area for the storage of such leather materials, please contact your installation's HWPM.

Leather materials generated from office spaces, including but not limited to chairs and sofas, will be turned into DLA for proper management. Should DLA not accept this material, please contact your installation's HWPM for proper guidance.

5.25 Life Raft/Inflatable Boats

Inflatable life rafts contain compressed gas canister(s) and emergency flares. Inflatable life rafts that are unsuitable for the fleet should be used for training when possible. Prior to disposal of any un-inflated life raft, all the HMs (i.e. compressed gas canisters, emergency flares, dye markers, emergency medical equipment, etc.) must be removed, the license plate (if equipped) is required to be removed and documented in the tracking system. Currently, the NNSY provides services to the Hampton Roads area for removal of HMs and disposal of inflatable boats.

If un-inflated life rafts require disposal (cannot be used for training and are designated non-usable) the following should be completed:

- Contact the NNSY life raft supervisor at 757-396-4761 for detailed total costs for disposal of life raft(s). Once you receive a disposal cost from the NNSY life raft supervisor contact the NNSY Business Office to complete a funding document.
- For funding document requirements and submittal procedures, contact the NNSY Business Office at 757-396-9980. This document will only cover the costs of the removal and disposal of the HMS and disposal of the life raft(s). The customer is responsible for transporting the life raft(s) from their installation (or location of the life rafts) to Bldg. 369 at NNSY.
- If transportation assistance is required, contact NAVFAC MIDLANT PWD Transportation to set-up transportation of the life raft(s) from your installation (or location of the life rafts) to Bldg. 369 at NNSY. Funding will be required when scheduling transportation arrangements.

5.26 Low Level Radioactive Material

Low-Level Radioactive Waste (LLRW) (Ex: smoke detectors, Tritium EXIT signs, radium gauges and dials, some watches, and compasses) is disposed of through the Radiological Affairs Support Office (RASO) LLRW. LLRW must remain at the site of generation and must be disposed of by the RASO office. To coordinate disposal of these items, contact RASO with the following information:

- Manufacturer Name, Trade Name, and Model Number
- National Stock Number (if applicable)
- Radiological Hazard (if known) and Amount (if known)
- Quantity of each
- Location of Items

To submit a DON request for LLRW disposal, follow these instructions:

a) Go to NAVSEA RASO LLRW milSuite page at https://www.milsuite.mil/book/groups/navsea-det-raso-llrw

b) Under the “Useful Documents” section on the right hand side of the milSuite page you will find information and documents for submitting an LLRW request for pickup to NAVSEA DET RASO.

c) The following is needed when submitting the LLRW Request to RASO:

a. Formal correspondence (signed by CO, OIC, or by Direction) to request disposal of command LLRW.

   i. A "sample letter" is provided for download from the milBook website. The command request letter is used mainly to formally submit the enclosures and can be modified as required by the command. Add any information you want regarding, or clarifying information about the command's LLRW inventory and funding.

b. "LLRW Disposal Request Enclosures" can be found on the milSuite site. Download the spreadsheet to your computer to enable the spreadsheet functionality. This MS Excel workbook contains two worksheets (see tabs at the bottom of the workbook).

   i. Tab labeled "Encl (1) – Command Info"

   ii. Tab labeled "Encl (2) – Cmd Inv"

d) Instructions for completing the Request Enclosures are embedded in the spreadsheet fields that will indicate the needed information as you work through each spreadsheet field. Please ensure all fields are completed as directed. As a couple of reminders, for:

a. Enclosure 1: Ensure the provided command point of contacts (POCs) listed (two are required) have knowledge of the LLRW inventory and can coordinate access and pickup for the waste broker.

b. Enclosure 2: Completeness of information is vital for determination of disposal and costing. These inventories will be reviewed by NAVSEA DET RASO and the DoD Lead Agency (Army JMC) to determine whether the waste is appropriate for disposition through the program. Remember that the characterization of the waste is the responsibility of the waste generator. Incomplete or inaccurate information may result in your waste not being picked up as requested

e) Once complete, e-mail your LLRW disposal request, both pdf cover letter and LLRW Request Enclosures in the excel spreadsheet format to:

nsscnavsearasoadmin@navy.mil and CC joseph.t.sevcik.civ@us.navy.mil

f) If you have any additional questions contact:

Mr. Joe Sevcik

Cell: (757) 633-9327

joseph.t.sevcik.civ@us.navy.mil

*******LLRW shall not be turned into the EV Services at any time*******

5.27 Medical/Bio-Hazardous Waste Outside of Medical Facilities

Regulated Medical Waste (RMW) is any solid waste that is suspected by a health care professional of being capable of producing an infectious disease in humans. Specifically, RMW includes cultures and stocks of microorganism and biologicals that are pathogenic to humans; human blood and body fluids; tissues and other anatomical wastes; sharps such as syringes, suture needles and scalpels; animal carcasses, parts and bedding from animals intentionally infected with organism pathogenic to humans; any residue resulting from a spill of RMW; and any solid waste mixed with RMW.

In the event of an emergency and/or incident that generates a medical/bio-hazardous waste; tenants should contact their PWD FMS or installation HWPM, or installation EV Department, who will arrange for the proper management and disposal of this waste stream.

Please contact your HWPM if you have any questions regarding medical/bio-hazardous waste.

5.28 Methyl Ethyl Ketone Peroxide (MEKP)

Due to the reactive nature of this material and its high disposal costs; MEKP will be issued in either 1-ounce resin kits (National Stock Number 6810-01-452-3268) or 2-ounce resin kits (National Stock Number 6810-01-452-3273). Every attempt should be made to completely consume the accelerant (MEKP) in the process. To dispose of unusable quantities of MEKP, contact the EV Services.

5.29 OBA (Oxygenated Breathing Apparatus) Canisters/EEBD (Emergency Escape Breathing Device)/Nuclear, Biological, Chemical (NBC) Filters

Contact the EV Services to arrange a pickup. The OBA canisters, EEBDs, and NBC filters need to be kept in the original packages. Do not attempt to disassemble the original packages.

5.30 Oil, Used Oil and Oily/Petroleum Wastes

Used petroleum based oils can be recycled. Label the container with the words **USED OIL**. Contact EV Services for further instructions or to schedule a pickup.

- At the point of generation it is acceptable to consolidate Used Oil, Used Hydraulic Fluid, Used PD-680 Type II, or Used JP-5 in the same container.
- Mixtures of Used Oil and Used Gasoline or motor gasoline (MoGas) are prohibited and must be managed as HW.

Used synthetic based oils cannot be recycled and must be turned in to EV Services. Do not mix synthetic oils/fluids with petroleum products and note "synthetic" on the container.

Ship Generated Oily Waste:

- **Acceptable Oily Wastes-** Non-contaminated bilge, ballast, and ship's fuel tank cleaning wastes, including butterworthing rinse water, may be disposed of as oily waste.
- **For all other oil containing wastes**, if it is contaminated with anything other than oily waste, it is either disposed offsite via contractor or sent to EV Services for disposal. Contact the HWPM or Water Program Manager for further guidance.
- **Ensure no contaminants** have entered the bilge water or oily waste.
- **Unacceptable contaminants include**, but are not limited to: AFFF, sewage (black water and gray water), HM, HW, JP4, aviation gasoline (AVGAS), MOGAS, gasoline, boiler cleaning wastes, anti-freeze, and Fuel System Icing Inhibitor (FSII).
- **Oily Waste Transfers During Night Hours** between sunset and sunrise are not normally permitted due to: reduced ability to immediately detect a spill; inability to determine amount and spread of a spill; and the need to recall and fund oil clean-up personnel. Approval for ships to discharge oily waste after dark must be obtained from

the Commanding Officers (CO) of the appropriate installation by phone call to the local Port Ops Officer. The following additional requirements must be in place:

- Extra Topside Safety Watches stationed at the discharge station and on the pier or Ship Waste Offload Barge (SWOB) to monitor the water for any oil sheens;
- Oil spill clean-up equipment on hand;
- Adequate lighting erected; and
  - The Chief Engineer will be on board to supervise the evolution.
    - **At JEBLCFS**: The Ship Support Office (SSO) provides oily waste collection and handling services. For emergency requirements outside normal working hours, contact JEBLCFS Port Ops.
    - **At NWSY/CAX**: If possible, oily waste should be off-loaded before arrival. If off-load at the facility is required, approval by the Installation CO prior to off-loading must be obtained and EV Services Oil Recovery should be contacted for disposal.

5.31 Paints

Paint chips: A Toxicity Characteristic Leaching Procedure (TCLP) test for metals must be completed before disposal because of chance of lead or other toxic metals (i.e. Cadmium and Chromium) in the paint chips. If an accurate waste determination cannot be performed prior to generating waste paint chips, then the waste is required to be managed as HW until an accurate waste determination can be completed. Contact your HWPM for management guidance and coordination for TCLP testing and disposal.

Empty paint can: (RCRA-empty fully defined in 40 CFR 261.7) Paint cans are considered to be empty if all paint has been removed that can be removed using practices commonly employed to remove the paint from the container (e.g., wiping, pouring, etc.).

- Metal paint cans that meet the above empty standard can be placed in dumpsters marked "metal only"; plastic cans should be placed in solid waste dumpsters.
- Paint cans that DO NOT meet the above empty standard must be managed as HW (requires accurate waste determination), turned into EV Services for disposal, and must not be allowed to air dry.

Unused/unopened containers of paint: should be returned to the HAZMINCEN for potential reuse. Keep containers closed; do not allow to air dry. Please see Section 1.0 of this guide for more information and additional alternatives to disposal. If the cans are rejected by the HAZMINCEN, the items will be managed as a waste; follow the procedure listed below:

- Liquid or solidified oil-based paint is to be managed as a HW and properly labeled. Contact EV Services to schedule a pickup. Excess un-used paint should be accumulated separately from solvent waste.
- Oil-Based Paint/Solvent related items such as brushes, rags, and rollers shall be managed as HW. Immediately containerize and keep containers closed at all times. Air drying is prohibited.
- Water-based (latex) paint is to be managed as non-regulated. Properly label the container, and contact EV Services to schedule a pickup.

- Water Based (latex) paint debris such as brushes, rags, and rollers will be managed as non-regulated and can be double bagged and disposed of as solid waste.

5.32 Paper Shredding

IWSM does not provide in-house shredding services. Individual work centers must arrange for their own shredding services. Vendors must be vetted to ensure that they meet the Navy security clearances and specific shredding requirements. Potential vendors (not vetted) are provided below.

- Shred-It 877-542-3992 (Sales)
- Shred Nations 800-747-3365 (Sales)

5.33 Parts Washer

Parts washer units utilize various substances such as solvents to remove dirt, lubricants, and other foreign particles from equipment components. When this solvent becomes contaminated to the point where it must be replaced, or your operations change, contact your HWPM to ensure proper waste characterization.

Do not assume that an environmentally friendly cleaning agent will not produce HW. Waste characterization depends on factors including what is being cleaned. Contact your HWPM to ensure proper waste characterization. HW solvent must be turned into EV Services for disposal.

For parts washers maintained by a private company (i.e. Safety Kleen), contact your HWPM to ensure proper waste characterization and disposal. Prior to off-site shipment of this waste, information about the waste must be provided to EV Services and a representative from EV Services must be present to sign the HW manifest.

5.34 Pesticides

For the most part, EV Services or approved contractor provides/applies pesticides on our installations in the Hampton Roads area, however, if a tenant command is need of disposal of pesticides, contact the installation HWPM and EV Services.

If tenant commands have received approval to obtain and use aerosol form pesticides (i.e. wasp spray, etc.), these aerosol cans (i.e. containing pesticides, insecticides, fungicides, etc.) shall not be punctured and are required to be collected separately as un-punctured aerosol cans for disposal with EV Services. See Section 5.2 above on discussion for aerosol can disposal.

5.35 Pharmaceutical Waste

EPA's HWP Rule, 40 CFR 266 Supbart P, became effective in Virginia on 23 August 2019. Pharmaceuticals become a solid waste when expired, damaged, or partially administered. Some pharmaceuticals are Controlled Substances regulated under the Drug Enforcement Administration. HWP meet the definition of hazardous waste because they are either listed, or because they exhibit a characteristic of HW. The Rule exempts discarded Food and Drug Administration approved over-the-counter nicotine replacement products (i.e., patches, gums and lozenges) as HW and prohibits the flushing or sewering of HWP.

Installations and commands in all generator categories must identify, segregate, contain, and appropriately label, store, transport, and dispose of HWP in compliance with the regulations. Contact your installation HWPM for guidance.

5.36 Polychlorinated Biphenyl (PCB)

PCBs were domestically manufactured from 1929 until their manufacture was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including electrical, heat transfer, and hydraulic equipment; as plasticizers in paints, plastics, and rubber products; in pigments, dyes, and carbonless copy paper; and many other industrial applications.

The most common trade name is Aroclor. Askeral may also be present and requires specific testing. Although no longer commercially produced in the United States, PCBs may be present in products and materials produced before the 1979 PCB ban. Products that may contain PCBs include:

- Transformers and capacitors;
- Other electrical equipment including voltage regulators, switches, reclosers, bushings, and electromagnets;
- Oil used in motors and hydraulic systems;
- Old electrical devices or appliances containing PCB capacitors;
- Galbestos siding;
- Fluorescent light ballasts (not green tips);
- Cable insulation;
- Thermal insulation material including fiberglass, felt, foam, and cork
- Adhesives and tapes;
- Oil-based paint;
- Caulking, plastics, carbonless copy paper, and floor finish.

If you have items for disposal that you believe may contain PCBs, please contact EV Services for guidance on disposal.

PCB-containing fluorescent light ballasts are to be turned in to EV Services as PCB waste. Contact EV Services schedule a pickup. Any non-PCB fluorescent light ballasts can be turned in to RRP.

NOTE

Fluorescent light ballasts that do not possess the marking "PCB free" are assumed to contain PCBs and should be managed accordingly.

5.37 Pressure Treated Lumber

Pressure treated lumber is currently being disposed of via landfill. Contact your HWPM for disposal assistance.

5.38 Rags/Shop Towels/Cloth Absorbents

5.38.1 Oily Rags

Place the rags in clear double plastic bags and label as "Used oil rags". Each bag should contain less than 35-pounds. Two (2) completed copies of DD 1348-1A, or 1348-1 created in HICSWIN, for each item are required for turn-in.

- **At NSN:** Oily rags can be taken to the EV Services Oil Recovery located at Bldg. Q-50 Monday-Friday from 0700-1530.
- **At JEBLCFS, NASO, and NWSY:** Contact EV Services at 341-0460/0412 to schedule a pickup.

5.38.2 HW Rags

Rags that have been contaminated with HM/HW, such as MEK (also known as 2-butanone), gasoline, solvents, or paint thinner, must be managed and disposed of as HW. If you have concerns on the solvent-contaminated wipes, contact your HWPM with your questions. Contact EV Services to schedule a pickup. Do not transport rags that are considered HW. *Immediately containerize and keep containers closed at all times. Air drying is prohibited.

5.38.3 Shop Towel Laundering Service

This service is no longer available. Contact the installation HWPM if your command is laundering towels with any internal or external agency or contractor.

5.39 Railroad Ties

Railroad Ties must be sent to a permitted landfill for proper disposal. Disposal must be coordinated with the Regional ISWM and QRP who will arrange for a dumpster. Railroad ties shall not be placed in regular solid waste dumpsters. Railroad ties *may not* be recycled, but they *may* be reused on a case by case basis.

5.40 Regulated Foreign Garbage (Foreign Food Waste)

Regulated Garbage (Foreign Food Waste) includes, but is not limited to: food scraps, table refuse, food wrappers or packaging materials and other waste material from stores, food preparation areas, crews' or passengers' quarters, and from aircraft or ships generated during international travel. Regulated Garbage also means meals and other foods that were available for consumption by passengers or crew on an aircraft but were not consumed. Plastic disks or plastic waste contaminated with foreign source food and garbage will be managed as Regulated Garbage.

5.40.1 General

- All Regulated Garbage is to be bagged, labeled with the words "Regulated Garbage", and placed in the Regulated Garbage container.
- Only Regulated Garbage and any item comingled with Regulated Garbage are to be placed into the container.
- All offloads of Regulated Garbage must be logged onto the Foreign Garbage Tracking Log.
- **ALL** Regulated Garbage must be removed from the installation within 120 hours of placement in the Regulated Garbage Container. Regional ISWM Program will coordinate removal of the container by Stericycle, Inc.

- The seal and door on the Regulated Garbage Container must remain closed unless adding waste.
- For spills, contact the Regional Dispatch Center at the respective installation. Spiller will be responsible to perform initial clean-up.
- EV Services will respond to spills at Navy Installations in the Hampton Roads Area and perform required decontamination.

5.40.2 Vessels

The ship must obtain the Regulated Garbage container from Dorado Services and request it on the LOGREC.

- Ship Support will provide the contact information for Dorado Services to the Supply Officer (SUPPO) or designee.
- The ship will contact Stericycle at least one week prior to arrival to order a container. The ship will use its Government credit card as payment.
- The Ship's designee will accompany the Customs and Border Protection (CBP) inspector during the on-board inspections prior to off-loading Regulated Garbage. The CBP Inspector will designate items as Regulated Garbage for disposal.
- Ship's crew collects all Regulated Garbage in 3-mil plastic bags, labels the bags and places them in the Regulated Garbage container located near the ship at the pier.
- ALL food wastes generated by US ships within the first 24 hours after arrival must be placed in the Regulated Garbage container.
- Host ships are responsible for ensuring foreign vessels comply with installation Regulated Garbage requirements.
- ALL food wastes generated by foreign vessels must be managed as Regulated Garbage while the ship is in port

5.40.3 AIRCRAFT (NSN and NASO):

- Commercial: Jet Services collects Regulated Garbage in 3 mil plastic bags and places in the Regulated Garbage container at the respective locations, LP-210 (NSN) or Bldg. 3050–North Pad (NASO).
- Military: Military Crew collects Regulated Garbage in 3 mil plastic bags and places in the Regulated Garbage container at the respective locations.

5.41 Silver/Silver Recovery Units

Solutions used in silver recovery units (i.e. photography shops, weapons x-ray, dental or hospital/ship x-ray rooms) may require management as a HW. Contact the HWPM for guidance on the management of these units.

5.42 Soil Guidance

Soil cannot be removed from any construction project site(s) without Installation EV authorization. This also includes any soil/debris removed from storm water drainage structures. Any movement of soil/fill material in or out of project site boundaries (i.e. soil brought onsite from borrow bit, soil relocated from project site to another site/area on the installation, soil disposed of, etc.), must be coordinated with the installation HWPM (coordination with the Pest Program Manager may be

needed if fire ant guidance is needed) to ensure proper characterization, which may require testing, and environmental compliance. Contact the installation HWPM for all soil guidance. Soil requirements below.

5.42.1 Excavated soils to be reused on the same construction project site:

- If the excavated soil is going to be reused in the construction project site (i.e. for grading, backfill, etc.), no characterization is required. However, if obvious signs of contamination are observed (e.g. free product, staining, odors, etc.) the installation HWPM should be contacted prior to reuse.

5.42.2 Excavated soil for disposal at permitted landfill:

- Per RCRA and VDEQ, waste generators are required to determine (via generator knowledge and/or analytical testing) if materials intended to be discarded (disposed of) meet the definition of a solid waste, and if so, whether the solid waste is a characteristic or listed HW.
- Generator knowledge includes but is not limited to: industrial operations, releases/spills, former contamination clean-up, etc. at the project site.
- Analytical requirements in accordance with VDEQ guidance document #LPR-SW-02-012 (Solid Waste Special Waste Disposal Request):
    - All analysis, methods, sample collection and frequency, etc. shall be conducted in accordance with EPA SW-846 Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods.
    - If soil is known to be contaminated with a petroleum product, sampling frequency will be one (1) sample for every 250 cubic yards of soil.
    - Analytical laboratories are required to be Virginia Environmental Laboratory Accreditation Program (VELAP) certified/accredited.
- All analytical results must be submitted to the installation HWPM and EV Services for review and disposal requirements (non-hazardous vs hazardous).
    - EV Services is the only authorizing agent permitted to sign all waste profiles and manifests (hazardous and non-hazardous) on behalf of the Navy.
- Most of the Hampton Roads area is currently located within an Imported Fire Ant quarantine area. Regulated articles (including soil) can be moved freely within the quarantine area; however, regulated articles may not be moved outside of the quarantine area unless they have been certified free of Imported Fire Ants by the Virginia Department of Agriculture and Consumer Affairs.
- Soil should be stored in a manner that prevents rain from infiltrating the soil matrix and preventing any runoff into the surrounding soil or pavement (e.g. store the soil over and under plastic sheets surrounded by hay bales or in lined, covered dumpsters).

5.42.3 Excavated soil to be used as "clean fill" outside project site:

- Excavated soils from a project site to be re-used at a different project site location (to include offsite borrow pits) will be required to meet the VDEQ's Management and Reuse of Contaminated Media Guidance (contained under Virginia Variance #LPR-SW-04-2012). This requirement will be the same as provided below for imported soil used as "clean" fill material.

5.42.4 Imported soil from off-site locations (e.g. borrow pit) for use as "clean fill":

- Analytical testing in accordance with the VDEQ's Management of and Reuse of Contaminated Media Guidance (contained under Virginia Variance #LPR-SW-04-2012).
    - All constituents/parameters and concentrations are displayed on Table 2 (Soil: Residential and Other High Frequency Receptors) and are required to be analyzed and concentration not exceeded.
    - In addition to Table 2 constituents listed above, the soil shall also be analyzed for total petroleum hydrocarbons (TPH), Total Benzene, Toluene, Ethylbenzene, and Xylene (BTEX), and Total Organic Halogens (TOX) to ensure the imported soils are not contaminated with petroleum products per VDEQ requirements.
    - All analysis, methods, sample collection and frequency, etc. shall be conducted in accordance with EPA SW-846 Test Methods for Evaluating Solid Waste, Physical/ Chemical Methods.
    - Analytical laboratories are required to be VELAP certified/accredited.
    - Soil used for IR sites is excluded from these requirements and is managed under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) program.
- All analytical results must be submitted to the installation HWPM for review and approval prior to importing soil being used on a project site.

5.43 Solder Waste (i.e. Lead, Silver, etc.)

Solder waste shall be managed as HW and can be disposed of through EV Services. Contact your HWPM for disposal guidance.

5.44 Solvents (i.e. PD-680, Acetone, Alcohols, etc.)

All Solvents shall be turned in to the EV Services for disposal as HW. Ensure containers are kept closed at all times.

5.45 Spent Blast Media

Spent blast media from blast booths or gloves boxes have the potential for recycling with a legitimate recycler instead of disposal. Ensure blast media is reused/recycled within the blast booth/glove box until it is no longer feasible. Initiate conversation with your blast media supplier to investigate the potential of a take back or recycling program. All recycling options should be approved by the installation HWPM.

If waste blast media is not recyclable with a legitimate recycler and disposal is required, an accurate waste determination is required. Blast booths and/or glove boxes may have the potential for disposal as HW depending on activity/operations. Contact the installation HWPM for evaluation of blast booth and/or glove box for accurate determinations and proper management/disposal.

5.46 Tetrahydrofuran (THF)

THF is a chemical that is commonly used as a softener, cleaner, and a bonding enhancer for fiberglass, plastic and rubber, and may be found in such things as boat repair kits. THF degrades by auto-oxidation into crystalline form over time or if exposed to air for a lengthy period of time. This presents an explosives risk. THF in crystallized form is highly unstable and must be disposed

of as an emergency response using detonation by Explosive Ordnance Disposal (EOD) division (**Appendix 1**) or a qualified contractor. For any THF material, whether still in liquid form or crystallized, notify your base Safety and the HWPM for proper disposal. **Do not** attempt to open, move, or transport the material until it can be properly assessed for continued use/storage/disposal. Targeted National Item Identification Numbers (NIINS) may include item 01-271-4835 and item 01-339-3640.

5.47 Tires

Contact PWD FMS or PAR if your command requires special dumpsters for regular small vehicle tires.

- NSN:
  - Contract the NSN ISWM or DLA (**Appendix 1**) to ensure proper disposal of tires.
- JEBLCFS:
  - ISWM manages a tire box inside the Recycling yard.

Big equipment vehicle tires require turn in with DLA. Tires must be managed in accordance with the Demilitarization Code. The majority of vehicle and/ or aircraft tires are non- Demilitarization or Mutilation required and may be turned-in to DLA intact. When discussing tire turn-in(s), customers do not need to mutilate tires (e.g., drill a hole through tire, slashing, or cut the sidewall/bead. Contact DLA to ensure proper tire turn-in procedures.

5.48 Unknown Wastes

Please contact your HWPM for guidance.

5.49 X-2 or X-3 Materials (Chemicals & Resins)

X-2 and X-3 materials must be de-militarized prior to disposal. Ships need to contact the item manager to receive de-militarized instructions. EV Services will also provide this service for an additional cost. Contact EV Services to schedule a pickup.

NOTE

To ensure proper handling, on the DD 1348-1A indicate the items are X-2 or X-3 material.

Appendices

Appendix 1: Points of Contact (POCs)

(Area Code is 757 unless otherwise noted)

Hazardous Waste and Pollution Prevention EV Core

Director (EV1)	341-0370
Hazardous Waste Compliance/EPCRA/P2 Director (EV12)	341-0400
Senior Program Manager for All sites	341-0408
Environmental Engineer	341-0371

Installation Environmental Compliance Departments

Joint Expeditionary Base Little Creek – Fort Story	
Director	462-5350
Hazardous Waste PM	462-5354
Lead Environmental Protection Specialist	462-5361
Environmental Protection Specialist	462-5355
Environmental Protection Specialist	462-5353
Environmental Protection Specialist	462-5356
Naval Station Norfolk	
Director	341-0523
Hazardous Waste PM	341-0659/1802
Lead Environmental Protection Specialist	341-0516
Environmental Protection Specialist	341-0520
Environmental Protection Specialist	341-0515
Environmental Protection Specialist	341-0511
Environmental Protection Specialist	341-0517
NAS Oceana/ Dam Neck Annex	
Director	433-3437
Hazardous Waste PM	433-3438
Environmental Protection Specialist (Flight Line, CSFWL, VACAPES, RSO Fuels)	433-5402
Environmental Protection Specialist (Dam Neck, Dare County, MACS24)	433-2131
Environmental Protection Specialist (FRC, NEX, MWR)	433-3439
Spill Program Manager	433-3435
NWS Yorktown / Cheatham Annex/Yorktown Fuels/ New Kent	
Director	887-4086
Hazardous Waste PM	887-4770
Environmental Protection Specialist (New Kent)	887-4384
Environmental Protection Specialist (WPNSTA Yorktown)	887-4881
Environmental Protection Specialist (CAX)	887-4384
NSA Hampton Roads	
Director	836-1862
Hazardous Waste PM	953-5680
Environmental Protection Specialist	421-8114
NSA Norfolk Naval Shipyard and Annexes	
Director	396-8270
Hazardous Waste PM	641-4370
Environmental Protection Specialist	341-0514

Environmental Services Department

NAVFAC MIDLANT EV Services	341-0460/0412 Fax:341-0436
Environmental Operations Director/ Supervisor	341-0471
NAVFAC MIDLANT HWO Profile Chemist	341-2295/0410
Asbestos & Insulation Branch	341-0474
NAVFAC MIDLANT Lab Services (LS)	341-0462, 341-0465 (fax)
NAVFAC MIDLANT Oil Recovery	341-1909, 341-0460 (fax)
NAVFAC MIDLANT Pest Services	341-0475

Regional Solid Waste and Recycling Program

Regional Integrated Solid Waste Program Director	341-1137
NAS Oceana / Dam Neck	985-7598
Joint Expeditionary Base Little Creek – Fort Story	462-7401
Naval Station Norfolk	445-0380
NSA Norfolk Naval Shipyard and Annexes	708-6774
NWS Yorktown / Cheatham Annex	708-6774
QRP (Expended Brass)-Yorktown, NSN, NASO	708-6774
QRP (Expended Brass) – JEBLC, NNSY	462-7401

Defense Depot Norfolk Virginia (DDNV)

Note: headquartered on Naval Station Norfolk but services the Mid-Atlantic Region	
Material Offload Scheduling (Trucks)	443-3131 or 443-3146
Material Offload Scheduling (Ships)	443-3120
X-2, X-3 Material Issue	443-3150

DLA Disposition Services

Note: headquartered on Naval Station Norfolk but services the Mid-Atlantic Region, https://www.dla.mil/	
Re-sale Information	278-8191
Hazardous Material Turn-in (Receiving)	278-5012/8292
Waste Disposal – Supervisor	278-8466
Waste Disposal – Specialist	278-8252
Waste Disposal – Specialist	278-8088
Electronic Waste (e-waste)	445-5115/2412
Defense Supply Center Richmond	1-804-279-5363

Fleet Logistics Center Norfolk (FLCN)

Note: headquartered on Naval Station Norfolk but services the Mid-Atlantic Region	
Regional Hazardous Management Deputy Director	341-5821
LOGISTICS SUPPORT CENTER	443-1861
HAZMINCEN – NSN LF-50 (HM support to JEBLCFS, Yorktown, Cheatham Annex, NSA HR Portsmouth Annex)	341-5832
HAZMINCEN – NASO Bldg. Z-826 (HM support provided to Dam Neck and Northwest)	433-3730
Reuse Store Facility (X-218)	445-7942

Consolidated Hazardous Material Reutilization & Inventory Management Program (CHRIMP)

CHRIMP Afloat Site Manager	445-7943
CHRIMP Afloat Support Bldg. X-218 (AOE/CVN/LHA/LHD/JEBLCFS)	444-4789/0593

Other Commands/Departments

EOD Mobile Unit Two Detachment Yorktown	615-8288 / 887-4177 / 615-8367
EOD Mobile Unit Two Detachment Norfolk	444-2734 / Alternate prim (423)297-3961 / second 269-8787
CNRMA Safety	322-2926 or 2927
NEMPU2	444-7671
Naval Air Technical Data & Engineering Service Command (NATEC)	https://mynatec.navair.navy.mil
PWC Maintenance Department – NSN	341-0788
PWC Transportation Department – NSN	341-0761
Port Operations	444-7345
Ship Support Office (SSO)-NSN/JEFLCFS	341-0800/462-4090
Rag Recycling Contract Administrator	717-605-6856
Radiological Affairs Support Office (RASO)	887-7610/887-4692
Paper Shredding (Building Z-311)	341-0768

Appendix 2: Spill Reporting Procedures

1. Report **ALL** spills to the Regional Dispatch Center (RDC) immediately. Installation RDC Contact Numbers:

Naval Station Norfolk	444-3333
NAS Oceana	433-9111
Dam Neck Annex	433-9111
NWS Yorktown	887-4911
JEB Little Creek	462-4444
JEB Ft. Story	422-7141
NALF Fentress	433-9111
DFSP Craney Island	396-3333
NNSY	396-3333
ROTHR New Kent	887-4911
St. Helena Annex	911
NSA Northwest	911
Dare County	911
NMC Portsmouth	396-3333

   RDC will dispatch all appropriate Fire/EMS/Police, Command Duty Officer (CDO), NAVFAC MIDLANT Oil Recovery/HW/Spill Response Team, the Navy On-Scene Coordinator (NOSC), and any other personnel requested to the spill location. Upon arrival of emergency services, the command who reported the spill will relay all of the pertinent information of the spill. The NOSC or Fire Department will serve as the Incident Commander (IC) for the duration of the spill containment, clean up, and investigation process.

   The following information should be obtained:

Name of person reporting the spill.	Quantity spilled
Command of person reporting the spill.	Cause of spill
Location of spill, Date & time of Spill	Substance spilled
Weather conditions including wind direction and speed and cloud cover	
Slick description including color and size	
Clean-up information: method, time and person(s) performing the cleanup.	
Spill Cleanup assistance requirements	
Notifications made to other commands.	

2. The National Response Center (NRC), State/Federal agencies, and any other required agency will be notified by the RDC, IC, or the NOSC as applicable.

3. The command responsible for the spill is required to report the incident, by sending a Navy spill message, in accordance with COMNAVBASENORVA/SOPA (ADMIN) HAMPINST 5400.1F and OPNAVINST M 5090.1. If there are any questions on spill reporting requirements, call your Installation Environmental Office or Spill Program Manager for more information. Personnel that fail to report a spill or who submit false or misleading information may be subject to criminal sanctions, including fines and/or imprisonment.

Appendix 3: Satellite Accumulation Area Flyer and Inspection Checklist

Satellite Accumulation Area (SAA)

Check To Ensure

- Max capacity **55-gallons** (regardless of the number of containers) and good housekeeping maintained at all times.
- Containers are closed (except when adding/removing waste), labels facing outward, and aisle space maintained for full inspection and emergency response.
- Do not date container until full. Once full and dated container must be moved to a CAA or disposal facility **(EV Services or offsite)** within **72-hours**. Container should be evaluated for disposal if on site for 1-year or more.
- Spill control and emergency communication equipment readily available.
- Fire extinguisher is readily available and monthly inspections performed.
- Ensure emergency evacuation routes are posted.
- Installation HW Contingency Plan reviewed and available.
- Contact NAVFAC Environmental (EV) Services (341-0412/0460) to arrange container pickup when container is 75% full. Contractors arrange/evaluate disposal with designated subcontractor and coordinate with NAVFAC EV Services for signatures on all disposal documentation.

HW Container ***Required*** Labels

Must include the words "Hazardous Waste"

Must identify contents or type of waste

No Accumulation Start Date (**ASD**) is required until container is full.

Must identify the hazards of the content (Examples):

Toxic Characteristic

Please contact the installation Hazardous Waste Program Manager with any HW issues:

_____

If an uncontrolled spill occurs, please call:_____

Satellite Accumulation Area (SAA) Checklist

Inspector	Inspection Date/Time		Navy Site ID
Operator/POC	**Contact Number**	**HW Training Date**	**Tenant Command/Unit and UIC**

All questions require answers. If any question is not compliant, a comment explaining corrections is required. Comment may include violation description, action, date action completed, and other pertinent details.

Compliance Questions	*Circle One*	*Comment*
1. Is the SAA at or near the point of generation and under control of the operator of the process generating the hazardous waste?	Yes No	
2. Is the area free of any spills or container overfills (visual/residual waste on/around the container) and is good housekeeping maintained?	Yes No	
3. Is fire control equipment (e.g. fire extinguisher) readily available (NFPA 10 within 50-feet) and current on monthly inspection?	Yes No	
4. Is spill control and communication equipment (e.g. absorbents, phones) readily available?	Yes No	**Spill equipment must be appropriate to waste being stored**
5. Are emergency evacuation routes posted?	Yes No	
6. Is the operator(s)/POC(s) Hazardous Waste annual training up to date and copy available at SAA?	Yes No	
7. Is a SAA sign posted that provides primary/alternate POCs and RDC emergency contact information?	Yes No	
8. Is a "NO SMOKING" sign posted?	Yes No	
If there is no hazardous waste currently stored at the site circle N/A for the remainder of checklist.		
9. Is the total volume of hazardous waste 55 gallons or less (and/or 1 quart or less of acutely hazardous waste)?	Yes No N/A	
10. Are containers kept closed except when waste is being added or removed?	Yes No N/A	
11. Are containers in good condition (non-leaking or non-corroded) and compatible with the waste stored in them? 360-degree visual inspection, adequate aisle space for emergency response?	Yes No N/A	
12. HW Labeling **a**. Clearly visible and facing out for inspection?	Yes No N/A	
b. Include the words, "HAZARDOUS WASTE?""	Yes No N/A	
c. Displays content(s) of the waste(s)?	Yes No N/A	
d. Displays hazards of the contents (e.g. DOT label)?	Yes No N/A	
e. Displays accumulation start date when container is full? **Container(s) must only be dated once full, and then the container(s) must be moved to a CAA or disposal facility within 72 hours.**	Yes No N/A	
13. Has pickup arrangement been made/submitted for container(s) with accumulation start date? **Arrangements should be made when container(s) are half-full or in time not to exceed the 72 hours when full.**	Yes No N/A	

For Environmental Personnel Only: Check Inspection Type: Oversight_____; Setup_____; Closeout_____ (Updated Dec 2022)

Appendix 4: Central Accumulation Area Flyer and Inspection Checklist

Central Accumulation Area (CAA)

Check To Ensure

- No limit on storage volume and good housekeeping maintained at all times.
- Containers are closed (except when adding/removing waste), labels facing outward, containers have ASD, and aisle space maintained for full inspection and emergency response.
- Site **MUST** be inspected every 7 days (records kept for a minimum of 3 years).
- Spill control and emergency communication equipment readily available.
- Fire extinguisher is readily available and monthly inspections performed.
- Ensure emergency evacuation routes are posted and personnel are aware of muster location(s).
- Installation HW Contingency Plan reviewed and available.
- Contact NAVFAC Environmental (EV) Services (341-0412/0460) to arrange container pickup. Containers **CAN NOT EXCEED 90-Days**. Start arranging for pickup no later than **45-50 Days** from **ASD**. Contractors arrange disposal with designated subcontractor and coordinate with NAVFAC EV Services for signatures on all disposal documentation.

HW Container ***Required*** Labels

Must include the words "Hazardous Waste"

Must identify contents or type of waste

Must have an Accumulation Start Date (**ASD**) when waste is placed in container.

Must identify the hazards of the content (Examples):

Toxic Characteristic

Please contact the installation Hazardous Waste Program Manager with any HW issues:

_____

If an uncontrolled spill occurs, please call:_____

Central Accumulation Area (CAA) Checklist

Inspector	Inspection Date/Time	Navy Site ID
Operator/POC	Contact Number / HW Training Date	Tenant Command/Unit and UIC

All questions require answers. If any question is not compliant, a comment explaining corrections is required. Comment may include violation description, action, date action completed, and other pertinent details.

	Compliance Questions	*Circle One*	*Comment*
1.	Is the CAA free of any spills or container overfills (visual/residual waste on/around the container) and is good housekeeping maintained?	Yes No	
2.	Is fire control equipment (e.g. fire extinguisher) readily available (NFPA 10 within 50-feet), and current on monthly inspection?	Yes No	
3.	Is spill control and communication equipment (e.g. absorbents, phones) readily available?	Yes No	**Spill equipment must be appropriate to waste being stored.
4.	Are emergency evacuation routes posted and personnel aware of muster location(s)?	Yes No	
5.	Is CAA inspection performed and properly documented weekly (Navy requires every 7 days), and maintained for minimum of 3 years?	Yes No	
6.	Is the operator(s)/POC(s) Hazardous Waste annual training up to date and copy available at CAA?	Yes No	
7.	Is a CAA sign posted that provides primary/alternate POCs and RDC emergency contact information?	Yes No	
8.	Is a "NO SMOKING" sign posted?	Yes No	
	If there is no hazardous waste currently stored at the site circle N/A for the remainder of checklist.		
9.	Are containers in good condition (non-leaking or non-corroded) and compatible with the waste stored in them? 360-degree visual inspection, adequate aisle space for emergency response?	Yes No N/A	
10. HW Container	**a.** < 26-gallons	Yes No N/A	Volatile Organic = contains organic constituents with a vapor pressure of >0.3kPa and is >20% by weight. Information from SDS of material. **If container for c is not DOT approved, procedures documenting determination of volatile organics is required. **If Answer to d is yes, contact installation Hazardous Waste Media Manager**
	b. >26 gallons but ≤119 gallons (non-bulk) and DOT approved?	Yes No N/A	
	c. >119 gallons (bulk), DOT approved, and **DOES NOT** contain volatile organics?	Yes No N/A	
	d. >119 gallons, DOT approved, and **DOES** contain volatile organics? Are air emission documentation maintained in records?	Yes No N/A	
11.	Are incompatible wastes separated (e.g. protective spacing, berm, wall, or dike)?	Yes No N/A	
12.	Are containers kept closed except when waste is being added or removed?	Yes No N/A	
13. HW Labels	**a.** Clearly visible and facing outward?	Yes No N/A	**Ensure any old labels/markings are removed.
	b. Includes the words, "Hazardous Waste"?	Yes No N/A	
	c. Displays content(s) of the waste(s)?	Yes No N/A	
	d. Displays accumulation start date?	Yes No N/A	
	e. Displays hazards of the contents (e.g. DOT label)?	Yes No N/A	
14.	Date of oldest HW container in the CAA.		
15.	Has pickup arrangement been made/submitted for all containers that have been accumulating for more than 45 days?	Yes No N/A	

For Environmental Personnel Only: Check Inspection Type: Oversight_____; Setup_____; Closeout_____ (Updated Dec 2022)

Appendix 5: Universal Waste Accumulation Area Flyer and Inspection Checklists

Universal Waste Accumulation Area (UWAA)

Check To Ensure

- No limit on storage volume and good housekeeping maintained at all times.
- UW is segregated and packaged correctly (e.g. waste batteries individually wrapped/packaged).
- Containers (including boxes) are closed and secured (except when adding waste).
- UW labels are facing outward.
- Containers have ASD which reflects the date when UW is first placed into container or brought to the site by authorized personnel.
- Spill control equipment readily available. Spill control equipment must be adequate to UW being stored (e.g. battery spill kit).
- Fire extinguisher is readily available and monthly inspections performed.
- Containers **CANNOT Exceed 1-year**. Contact NAVFAC Environmental (EV) Services (341-0412/0460) to arrange container pickup no later than 270 days (9 months) from **ASD**. Contractors arrange/evaluate disposal with designated subcontractor and coordinate with NAVFAC EV Services for signatures on all disposal documentation.

UW Container ***Required*** Label

Must include the words "Universal Waste"

Must have a start date when waste is placed into container or brought to the site. Accumulation Start Date **(ASD)**

Must identify contents of waste (i.e. batteries, lamps)

Please contact the installation Hazardous Waste Program Manager with any HW issues:

_____

If an uncontrolled spill occurs, please call _____

Universal Waste Accumulation Area (UWAA) Checklist

Inspector	Inspection Date/Time	Navy Site ID

Operator/POC	Contact Number	HW Training Date	Tenant Command/Unit and UIC

All questions require answers. If any question is not compliant, a comment explaining corrections is required. Comment may include violation description, action, date action completed, and other pertinent details.

Compliance Questions	*Circle One*	*Comment*
1. Is the UWAA free of any spills or container overfills (visual/residual waste on/around the container)?	Yes No	
2. Are good housekeeping standards employed?	Yes No	
3. Is fire control equipment (e.g. fire extinguisher) readily available (NFPA 10 within 50-feet) and current on inspection?	Yes No	
4 Is spill control and communication equipment (e.g. absorbents, phones) readily available?	Yes No	**Spill equipment must be appropriate to waste being stored**
5. Is the operator(s)/POC(s) Hazardous Waste annual training up to date and copy available at UWAA?	Yes No	
6. Is a UWAA sign posted that provides primary/alternate POCs and RDC emergency contact information?	Yes No	
7. Is a "NO SMOKING" sign posted?	Yes No	
If there is no Universal Waste currently stored at the site answer N/A for the remainder of checklist.		
8. Are containers (including boxes) kept closed except when waste is being added or removed?	Yes No N/A	
9. Are containers in good condition (non-leaking or non-corroded) and compatible with the waste stored in them? 360-degree visual inspection.	Yes No N/A	
10. Is the Universal Waste segregated and packaged correctly? (i.e. batteries individually wrapped/packaged and/or terminals taped).	Yes No N/A	
11. Does each container have a label or marking that includes one of the following below phrases or similar phrase? **Circle the applicable item and N/A What Does Not Apply:**		
a. Universal Waste – Battery(ies), or	Yes No N/A	
b. Universal Waste – Pesticide(s), or	Yes No N/A	
c. Universal Waste – Mercury-containing Equipment, or	Yes No N/A	
d. Universal Waste – Lamp(s), or	Yes No N/A	
e. Universal Waste – Aerosol Can(s)	Yes No N/A	
12. Does each container display the accumulation start date?	Yes No N/A	
13. Date of oldest container in the UWAA.		
13. Has a pickup request been submitted for all containers that have been accumulating for 270 days (9 months)? **Recommended to schedule/coordinate pickup no more than 9-months from start date, UW must be disposed of within 1-year.**	Yes No N/A	

For Environmental Personnel Only: Check Inspection Type: Oversight:_____; Setup_____; Closeout_____ (Updated Dec 2022)

Appendix 6: Hazardous Waste Pharmaceuticals Accumulation Area Flyer and Inspection Checklists

Non-Creditable Hazardous Waste Pharmaceutical Accumulation Area (HWPAA)

CHECK TO ENSURE

- Containers are closed/secured (except when adding/removing waste).
- HWP labels are visible and facing outward.
- Container start date and contents are present. A log sheet located near the container can also be used to log contents in container.
- Spill control equipment readily available.
- Good housekeeping maintained at all times.
- Contact the Naval Medical Center Portsmouth (NMCP) Environmental Department 757-953-5671 or 757-953-9623 to arrange container pickup once container has been in service for 270 Days (9 months).

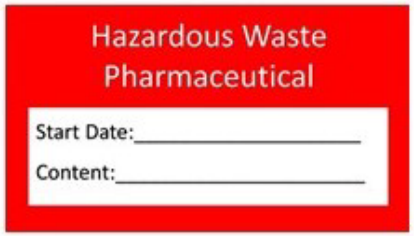
HWP Container Label

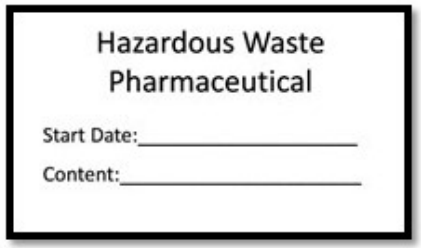
Must include the words "Hazardous Waste Pharmaceutical"

Must have a start date when waste is first placed into container or the container is put into service.

Must identify contents of waste

Label Examples





Please contact the Installation Hazardous Waste Program Manager with any issues:

_____

If an uncontrolled spill occurs, please call _____

Hazardous Waste Pharmaceutical Accumulation Area (HWPAA) Checklist

Inspector	Inspection Date/Time	Navy Site ID

Operator/POC	Contact Number	HW Training Date	Tenant Command/Unit and UIC

All questions require answers. If any question is not compliant, a comment explaining corrections is required. Comment may include violation description, action, date action completed, and other pertinent details.

Compliance Questions	***Circle One***	***Comment***
1. Is the area free of any spills or container overfills (visual/residual waste on/around the container)?	Yes No	
2. Is good housekeeping standards employed?	Yes No	
3. Is spill control and communication equipment (e.g. absorbents, phones) readily available?	Yes No	**Spill equipment must be appropriate to waste being stored**
4. Is the HWP operator(s) annual training up to date and copy available at HWPAA?	Yes No	
5. Is a HWPAA sign posted that provides primary/alternate POCs and RDC emergency contact information?	Yes No	
If there is no HWPs currently stored at the site answer N/A for the remainder of checklist.		
6. Are containers kept closed except when waste is being added or removed?	Yes No N/A	
7. Are containers in good condition (non-leaking or non-corroded) and compatible with the waste stored in them? 360-degree visual inspection.	Yes No N/A	
8. Is each container labeled/marked with the words "Hazardous Waste Pharmaceutical"?	Yes No N/A	
9. Is each container labeled/marked with the accumulation start date?	Yes No N/A	
10. Is each container labeled/marked with the contents?	Yes No N/A	** A log sheet can also be used to maintain contents in container.
11. Date of oldest container in the HWPAA.		
12. Has a pickup request been submitted for all HWP containers that have been accumulating for more than 270 days (9 months)? **Recommended to schedule/coordinate pickup no more than 9-months from start date, HWPs must be disposed of within 1-year.**	Yes No N/A	

For Environmental Personnel Only: Check Inspection Type: Oversight:_____; Setup_____; Closeout_____ (Updated Dec 2022)

Appendix 7: ECATTS Instructions

The DON has a web-based program to provide EV training. The program, Environmental Compliance, Assessment, Training, and Tracking System (ECATTS), is intended to be used by contractors, civilians, and military personnel and will eventually be used throughout the Department of Defense (DOD). ECATTS is primarily intended to provide basic EV awareness training, but also provides some in depth training and certification. ECATTS includes numerous short training modules on topics such as pollution prevention, affirmative procurement, pesticides, and pollution control. Personnel who are required to attend annual training for Storm Water Pollution Prevention and Hazardous Waste (HW) Accumulation Area training can now fulfill these training requirements using ECATTS. The training is self-paced and the web site can be accessed from any internet connected computer.

Registration instructions are as follows:

1. Logon to https://environmentaltraining.ecatts.com
2. In the "Register-New Users" section, enter the password (please contact HWPM for password) and select the "Create an Account" option
3. Complete Step 1 through Step 6 as follows: **(Job title: Administrations or EV. Management)**
    a. Step 1 – input your personal information.
    b. Step 2 – input a password and user id (user id must be at least 4 characters).
    c. Step 3 – Designate if you are a contractor or installation/tenant staff (Check the box for NAVFAC associate only if you manage contractors).
    d. Step 4 – Select the installation in Hampton Roads where you primarily work.
    e. Step 5 – Select any additional training you may need based on your assigned job duties (i.e. if you manage a HW accumulation area, check the HW module[s]).
    f. Step 6 – Read and acknowledge the User Agreement.
4. Once your profile has been established, press the "My Training Plan" button to access the required and optional training modules.

Please Complete the below training:

Hazardous Waste Management

Any other training module directed by installation EV or PWD personnel

5. After completing each module, take the test, and print a copy of your certification for your personnel records, submission if requested, or hard copy at the HW accumulation area.

For military personnel without access to a computer, discuss with your supervisor on available computer options for your command. MWR Recreation Centers may also have computers with internet access.

Appendix 8: Material Potential Presenting an Explosive Hazard (MPPEH) Guidance

1.0 Material Potentially Presenting an Explosive Hazard (MPPEH)

Please contact the installation Explosive Safety Officer (ESO) and/or HWPM for assistance and guidance for the management and processing of MPPEH, and any clarifications on the below guidance. Exploded Ordnance Disposal (EOD) Mobile Unit Two Detachment Norfolk or Yorktown (**Appendix 1**), shall provide emergency response in the event of an emergency.

MPPEH is material owned or controlled by the DOD that, prior to determination of its explosives safety status, potentially contains explosives or munitions (e.g. munitions containers, packaging material, munitions debris, etc.), or potentially contains a high enough concentration of explosives that the material presents an explosive hazard.

Excluded from MPPEH are military munitions and military munitions-related material that are to be used or reused for their intended purpose that are within a DOD component's established munitions management system, and other hazardous items that may present explosion hazards (such as gasoline cans, compressed gas cylinders) that are not munitions and are not intended for use as munitions.

MPPEH must be assumed to present an explosion hazard until it is assessed and its explosives safety status documented. Mismanaged MPPEH could be an Explosive Hazardous Waste (EHW), HW, or just a solid waste (SW). This includes munitions containers and packaging material presumed to be empty but that could present an explosive hazard through human error. MPPEH is often metal, but can also be wood, plastic, paper, and other materials.

1.1 References

Below are references (not all-inclusive) for additional guidance and procedures for MPPEH.

1) NAVSEA OP5, Volume 1, Seventh Revision (verify/use most current version). Ammunition and Explosive Safety Ashore.
   (a) Chapter 13-15 establishes criteria for managing and processing MPPEH.
2) DOD Instruction 4140.62 (verify/use most current version), Material Potentially Presenting an Explosive Hazard (MPPEH).
   (a) Establishes policy and assigns responsibilities for the management and disposition of MPPEH, material documented as an explosive hazard (MDEH), and material documented as safe (MDAS). Authorizes other publications related to and supporting the management and disposition of MPPEH, MDEH, and MDAS.
3) DOD Manual 4140.72 (verify/use most current version). Management of Material Potentially Presenting an Explosive Hazard.
   (a) Implements policy, assigns responsibilities, and provides procedures for the management and disposition of MPPEH.
4) DOD Instruction and Manual (multi volumes) 4160.28. DOD Demilitarization (DEMIL) Program and Procedural Guidance.

1.2 Written Operating Procedures

Tenant command(s) that generate MPPEH is responsible for developing written operating procedures prior to starting any operation involving explosives (which includes screening, management, assessment, documentation, etc. of MPPEH). The written procedures shall cover **all** processes and ensure compliance with technical requirements, explosives safety standards, Federal/State/Local environmental regulations, etc.

The information provided here is only guidance and does not constitute a command operating and/or written procedures, nor does it supersede guidance provided in any reference or other official Navy requirements, it may be used as an aid to develop written operating procedures, all information must be in accordance with NAVSEA OP5.

1.3 MPPEH Site Approval Requirements

MPPEH processing includes any action or operation involving MPPEH, including but not limited to: collecting, consolidating, sorting, segregating, separating by metal type, inspecting, storing, decontaminating, transferring, certifying, releasing, demilitarizing (shredding, shearing, chopping, crushing, flattening, cutting, melting), and transporting materials. Locations used to process MPPEH must have site approval in accordance with NAVSEA OP5. Areas where MPPEH is processed or stored must be designated as restricted area(s) and posted in accordance NAVSEA OP5, until the MPPEH is certified/verified safe. MPPEH shall be covered or stored in closed containers to prevent exposure to or the collection of precipitation.

Expended small arms ammunition cartridge cases may be processed as a nonexplosive operation prior to being assessed and determined safe, provided that they are screened before processing. Screening is intended to ensure that only .50-caliber and smaller expended cartridge cases are present, and to remove unused/unfired cartridges. Screening will be done by locally determined methods included in approved written operating procedures. After the expended small arms cartridge cases have been screened, they must be placed in a closed container and kept in a controlled location in accordance with NAVSEA OP5.

1.4 MPPEH Assessing and Documenting

MPPEH may be transferred within an installation, (e.g., between the host and tenant commands or within a command) if both parties agree with the transfer, the maximum explosives safety hazards is documented on transfer paperwork, the transfer complies with all other explosives safety requirements, and the material is not moved over public routes in accordance with NAVSEA OP5. MPPEH shall not be transferred within or released from DON control unless its explosives safety status has been assessed and documented.

Based on the release changes to NAVSEA OP5 by Naval Ordnance Safety and Security Activity (NOSSA) in September 2020, if tenant commands are visiting another installation, commands are authorized to transport expended small arms cartridge casings and associated munition-related material (e.g., containers, links, etc.) over public roads back to originating installation without certifying and verifying as MDAS, as long as:

- Screening (100% visual inspection) by two individuals is performed to ensure no unfired rounds are present, and
- Screening is properly documented on a Disposal Turn-in Document DD Form 1348-1 (series and here in referred to as DD-1348) (or a local form as authorized by the CO) prior to leaving the installations. Documentation to include names of individuals that performed screening, date, and type of material screened.

1.4.1 Certifier and Verifier

Processing of MPPEH is considered handling or physically interacting with ammunition and explosives. All DON personnel who are responsible to process, inspect, and document MPPEH as either MDAS or MDEH must be qualified in ammunition and explosives handlers qualification and certification program for those tasks.

Personnel who are qualified and authorized to inspect MPPEH and document its explosives safety status as MDAS or MDEH, will be so designated in writing by direction of their CO, or officer in charge (OIC). This includes unexploded ordnance (UXO) contractor performing work for NAVFAC or Base Closure and Realignment Commission (BRAC) Programs.

MDAS designation letters shall list the personnel who are qualified and authorized to assess and document the explosives safety status of MPPEH, identify the type of MPPEH that they are authorized to inspect, include sample signatures, date of issuance, and placed on command letterhead. A copy of this designation letter must be provided to any DLA Disposition Service (here in referred to as DLA) and/or QRP receiving MDAS and must be updated **annually**. It is recommended that separate designation letters are developed for DLA and QRP, but could potentially be one letter to cover both, verification is needed with your local DLA and QRP. An example designation letter is provided in Section 1.9 below, and an electronic copy can be obtained from your installation ESO, HWPM, or QRP Manager.

1.4.2 Material Documented as Safe (MDAS)

MDAS is MPPEH that has been assessed and documented as not presenting an explosive hazard and for which the chain of custody has been established and maintained. MDAS may be assessed by Visual 100% inspection by two (2) independent qualified personnel, NOSSA and Department of Defense Explosive Safety Board (DDESB) approved technical methods, or expert knowledge approved by NOSSA. MDAS must be segregated in a location with controlled access, preferably a locked facility.

1.4.2.1 MDAS Certification

Certification documentation for MDAS will consist of a DD-1348 (or a local form as authorized by the CO). The MDAS certification documentation must identify the material type (e.g., expended 9mm brass, mixed metal range gleanings, etc.). Documentation as MDAS requires dual signatures, the first signature may be provided by either a DOD employee or DOD contractor, and a U.S. citizen who may be either a DOD employee or a DOD contractor and independent of the first inspector must provide the second signature. All MDAS documentation shall include the following statement: "The material listed on this form has been inspected or processed by DDESB-approved means, as required by DOD policy, and to the best of my knowledge and belief does not pose an explosive hazard". If the required documentation is incomplete, lost, or chain of custody is compromised, this material is no longer considered MDAS and reverts back to MPPEH.

All containers of MDAS material must have a unique identifier linking the documentation to the container. If MDAS is being accumulated in a container over time (e.g. multiple days, months, etc.) then an alternate use of a MDAS batch certification form can be used in lieu of a DD-1348 (or a local form as authorized by the CO) if preferred. However, all required information in accordance with NAVSEA OP5 has to be present on the batch form and maintained with the container. Once container is ready for dispositioning with QRP or DLA, then a DD-1348 (or a

local form as authorized by the CO) is required for turn-in. Maintain all batch forms with the appropriate DD-1348 for record retention. Example of a MDAS batch certification form is provided in Section 1.9 below and an electronic copy can be obtained from your installation ESO, HWPM, or QRP Manager.

Retain legible copies of all documents supporting the explosives safety status of the material as MDAS for a minimum of three (3) years. DLA or contracts may impose additional certification requirements.

1.4.2.2 MDAS Transportation

MDAS may be shipped over public traffic routes as inert material. Documentation of its explosives safety status must accompany the shipment. If the shipment contains hazardous materials other than explosives, appropriate hazard classification of the hazardous materials is required and the hazard classification assignments must accompany the shipment.

1.4.3 Material Documented an Explosive Hazard (MDEH)

MDEH is MPPEH that cannot be documented as MDAS that has been assessed and documented as to the maximum explosive hazards the material is known or suspected to be present. This includes material that:

- Has been examined and no contamination can be visually noted on accessible surfaces, but explosives may be present in concealed housings or other hidden areas such as internal cavities or devices that contain explosives.
- Is expected to be free of an explosion hazard, but not enough information is available to certify it as safe.
- Is known or suspected to pose an explosive hazard.

1.4.3.1 MDEH Certification

Certification documentation for MDEH will consist of a DD-1348, a DD Form 2271 (Decontamination Tag), or a local form as authorized by the CO. Documentation as hazardous requires a 100% visual inspection. When an initial inspection by a qualified and authorized person determines that the material is hazardous, a second independent inspection is not required, and the inspector shall prepare the certification.

The certification document must provide information about: type of explosive hazard or contamination, presence of un-vented cavities, estimated maximum net explosive weight (NEW), and include the following statement: "This certifies that the material potentially presenting an explosive hazard listed has been 100 percent properly inspected and to the best of my knowledge and belief presents an explosive hazard". If the required documentation is incomplete, lost, or chain of custody is compromised, this material is no longer considered MDEH and reverts back to MPPEH.

Retain legible copies of all documents supporting the explosives safety status of the material as MDEH for a minimum of three (3) years.

1.4.3.2 MDEH Transportation

MDEH requires certification prior to transporting from either EOD, UXO technician III (or higher), or other designated authorized personnel, that documents the MDEH is "safe to transport" and certification must accompany shipment. Hazard classification assignments also required to accompany shipment. Contact EOD Mobile Unit Two Detachment Norfolk or Yorktown (**Appendix 1**) for guidance, and assistance with certifications prior to transporting MDEH.

MDEH that cannot be shipped in accordance with an existing hazard classification must not be transported over public traffic routes until an interim hazard classification (IHC) is obtained from NOSSA. Note that IHCs are not required for MDEH transported as hazard Class/ Division 1.1 in military vehicles in accordance with NAVSEA OP5. If required, hazard classification assignments must also accompany the shipment.

1.5 Documentation Chain of Custody and Container Control

Documentation is key to the safe management of MPPEH. Documentation allows certification, chain of custody, and explosives safety status to be known at all times. Containers of material whose explosives safety status has been documented will have permanent marking and labeling, and container seals. Large items, such as plant equipment, will have permanent weatherproof tags, or painted or engraved markings traceable to the certification document. Documentation of the material's explosives safety must have unique identifiers, (such as drum, seal, or document numbers) to link paperwork supporting the material's explosives safety status, and accompany MDAS and MDEH during transfer within or release from DON control.

In order to maintain the chain of custody, do not commingle MPPEH, MDAS and/or MDEH. Should commingling occur such that chain of custody cannot be verified, MDAS and/or MDEH shall lose its documented explosives safety status and become MPPEH. Employ measures to prevent commingling such as (but not limited to): separate storage locations within the storage site, moveable signs and ribbon barriers, locked gates, etc.

Containers are to be stored in an approved site location where containers (e.g. 55-gallon drums, etc.) are protected from the elements (e.g. rain, snow, etc.). At no time before or after certification and verification will water or moisture be allowed into the containers. Partially filled containers of MDAS will be labeled and secured between filling events.

1.6 Training Requirements

Refer to Appendix D of NAVSEA OP5 for all training details associated with MPPEH and potentially Military Munitions Rule (MMR). Personnel designated to assess MPPEH will also require MMR Training. Table D-1 of NAVSEA OP5 provides a quick reference guide for explosive safety training requirements. MPPEH and MMR training are an **annual** requirement. The MPPEH training course is available to personnel on Navy e-Learning (NeL) at https://learning.nel.navy.mil. Contact your installation ESO if your personnel do not have a CAC and need training.

Screening procedures of expended small arms cartridge casings and associated munition-related material (e.g., containers, links, etc.) does not require annual MPPEH/MMR training; however, individuals need awareness training onsite and written procedures to follow on properly screening approved materials.

1.6.1 QRP Personnel

QRP personnel are required to complete the annual MPPEH training; however, the completion of MMR training is not required. QRP personnel who receive eligible MDAS must have awareness training to do the following:

- Recognize QRP eligible material.
- Verify signatures on all turn-in documents (e.g. DD-1348, or other authorized disposition document), against the approved designation letter of personnel authorized to certify/verify as safe.
- Visually inspect certified QRP eligible material, and recognize potential explosives safety hazards and response procedures if an unsafe condition is identified.

1.7 Demilitarization

Demilitarization is often a separate requirement from documenting the explosives safety status of the material. MPPEH is often determined to be MDAS before demilitarization. Demilitarization emphasizes removing the capability to reuse munitions for their original purpose, and meeting trade security requirements. In some cases, a demilitarization requirement (such as venting or burning) may be satisfied before the material can become MDAS. DLA issue specific demilitarization requirements see NAVSEA OP5 for further guidance.

1.8 MDAS Turn-In Options and Discussion/Examples

MDAS can be turned into either DLA or the local QRP as appropriate for recycling through sales. DLA or QRP under no circumstance will accept any MDAS items that do not include the proper documentation. The below sections are not all inclusive, contact your installation QRP Manager, and/or local DLA to verify all MDAS turn-in procedures and requirements.

1.8.1 QRP Eligible Items

Below are eligible items for QRP, however, contact the installation QRP Manager and/or HWPM to obtain confirmation on eligible items for the Hampton Roads Area and proper turn-in requirements. Materials below are considered most likely to be free of explosive contamination, by its nature, and thus most suitable for turn-in to the QRP following MDAS certification:

- MDAS Expended small arms ammunition cartridge cases which includes .50 caliber (12.7mm) and below.
    - Expended small arms cartridge casings that have been certified and verified as MDAS in accordance with NAVSEA OP5, can be turned into QRP as long as all requirements of NAVSEA OP5 and the QRP MDAS Operation Guide are met. Metal types (e.g. steel, chrome, aluminum, brass) should be in separate 55-gallon drums. Under no circumstances should large (.50 caliber) and small (.22 caliber) be mixed/co-mingled with any other size cartridge casings, they must be containerized separately. Range residue, other than small arms cases, e.g., shrapnel or lead, will be placed in its own container and clearly marked. Expended small arms cartridge casings **CANNOT** be disposed of in a solid waste or metal dumpster.
- Mixed metals from range clearance.
    - Debris consisting of unrecognizable fragments of metal.

- Metal debris from non-Munitions List Item (MLI) or Commerce Control List Item (CCLI) targets consisting of unrecognizable pieces and fragments of metal. Any debris resulting from a target that was designed to resemble a munitions item must be deformed or otherwise destroyed so that it cannot be misidentified as a munitions item.

- Empty metal small arms ammunition (.50 caliber and below) containers that are not acceptable for repurposing (see Section 1.8.3), reuse (i.e. Navy Supply), or rejected by DLA (see Section 1.8.2). Empty containers also discussed in Section 1.8.4.
    - Damaged empty metal ammunition containers are required to be certified and verified as MDAS prior to dispositioning/recycling. All MDAS requirements apply (e.g. closed container, DD-1348, designation letter, etc.) similar to expended small arms cartridge casings.
    - There is a possibility that the local QRP in Hampton Roads Area has not developed procedures or is not accepting empty metal ammunitions containers, Contact the QRP Manager and/or HWPM for assistance and guidance.
- Metal packaging and crating material, such as banding and pallet skids.

1.8.1.1 QRP Specific Requirements For Excepting Eligible MDAS

A written explosives Mishap Risk Assessment (MRA) or Operational Risk Management (ORM) assessment in accordance with NAVSEA OP5 will be performed before any QRP may receive MDAS. The results of the MRA or ORM assessment will be used to develop approved written procedures for processing MDAS prior to transfer to the QRP. The QRP must also develop written operating procedures/guide for MDAS management that covers all eligible items and ensures chain of custody and MDAS documentation requirements are met.

Anything requiring demilitarization or that is an MLI or a CCLI, is not QRP eligible, with the exceptions noted above in Section 1.8.1. In addition, QRP must perform the following below prior to public sale:

- Expended small arms cartridge cases must be crushed, shredded, deformed, or otherwise destroyed, and
- Debris from targets must be flattened or otherwise altered so that it cannot possibly contain a munitions item.

1.8.2 DLA Disposition Service

Other MPPEH (e.g. expended casings larger than .50 caliber/13 mm, Cartridge and Propellant Actuated Devices, clips and links, empty ammunition/explosive containers, etc.) that can be 100 percent visually inspected and certified/verified as MDAS can be turned into DLA. MDAS documentation must be provided in accordance with NAVSEA OP5; however, DLA may require different or additional documentation. Verify all turn-in documentation procedures with the local DLA.

Expended shotgun shells should be turned in to the DLA if possible. However, if DLA will not accept them, expended shotgun shells that do not exhibit HW characteristics may be disposed of as SW (that is, general trash) if they are 100 percent visually screened for the presence of unfired

rounds by two (2) different individuals in accordance with approved written operating procedures.

Empty small arms ammunition containers that cannot be repurposed or reused, and requires disposition (MDAS certification required) is to be turned into DLA. In the event that empty small arms ammunition containers are not serviceable and rejected by DLA, and cannot be repurposed, see Section 1.8.1 for potential recycling with QRP.

1.8.3 Repurposing Empty Containers

Empty containers that previously held ammunition and/or explosives may be repurposed to another use if all the below conditions are met (documentation of the explosives safety status of the repurposed containers is not required):

- The containers are 100 percent visually screened for the presence of munitions by two (2) different individuals in accordance with approved written operating procedures;
- All markings associated with the original contents are obliterated, and
- The containers are stenciled or labeled on two opposing sides reflecting their current use or repainted in a manner that clearly indicates that they have been repurposed and do not contain ammunition and/or explosives.

If empty containers are not repurposed, then refer to section discussions on dispositioning with DLA.

1.8.4 Packing Materials and Empty Containers Disposition

1.8.4.1 Empty Containers

All containers that were previously used for ammunition and explosives are considered MPPEH until certified as MDAS or MDEH and must be managed as such (e.g. documentation, container control, etc.). Prior to release from DON control to DLA, all empty containers, except small arms ammunition containers, must be marked with the word "EMPTY" and previous markings removed or obliterated. Refer to NAVSEA OP5 for marking requirements for empty munition containers to be shipped to other DON or DOD component activities for storage, reuse or salvage.

1.8.4.2 Packing Materials

Approved cardboard, plastic, and plywood containers and packaging materials for C/D 1.4S materials may be recycled or discarded as SW (general trash) provided that the following criteria are met:

- The items are 100 percent visually screened for the presence of munitions by two (2) different individuals in accordance with approved written operating procedures;
- All previous markings are removed or obliterated;
- The items are broken down or otherwise deformed so that they may not be used for their original purpose; and
- There are no EV regulations precluding such disposal.

Approved cardboard, plastic, and plywood containers and packaging material for other than C/D 1.4S items may be recycled or discarded as SW (general trash) provided that the following criteria are met:

- The items are 100 percent visually screened for the presence of munitions by two (2) different individuals in accordance with approved written operating procedures;
- All previous markings are removed or obliterated;
- The items are broken down or otherwise deformed so that they may not be used for their original purpose;
- There are no EV regulations precluding such disposal;
- The items are certified as MDAS on a DD-1348 or a local form as authorized by the CO; and
- A chain of custody is maintained until the MDAS leaves the restricted area (i.e., areas where munitions operations or MPPEH generation is occurring) and enters the facility's solid waste stream.

If any additional assistance or guidance is need on meeting the above criteria for packing materials for other than C/D 1.4S items, contact your installation ESO and/or HWPM. Requests may be submitted to NOSSA for review of tenant commands activities and assistance on how to meet the above criteria requirements.

1.9 Example Forms

MDAS Batch Certification Form

MDAS Container ID (or other unique identifier) _____

This form is being used to record the addition of MDAS to the container in batches; instructions and a controlled copy are contained in SOP_____. This form should only be used to record batch additions to a single container until it is full or otherwise ready for turn-in. When starting a new container, start a new form. Each batch of the MDAS listed below was independently 100% visually inspected by the two authorized and qualified individuals whose signatures are shown below and they affirm that:

"The material listed on this form has been inspected or processed by DDESB-approved means, as required by DoD policy, and to the best of my knowledge and belief does not pose an explosive hazard."

Date	MDAS Description	Quantity*	Certifier	Verifier
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)
			(Sign)	(Sign)
			(Print)	(Print)

*For small items, such as expended small arms cartridges, quantity can be estimated

Relevant Comments:_____

Organization Name: _____

Organization Address: _____

Organization Phone #: _____

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COMMAND LETTERHEAD

8020
Ser XX/XXX
Date

From: Commanding Officer/Officer in Charge, [activity name]
To: Defense Logistics Agency (DLA) or specific Qualified Recycling Program (QRP) (Where the material is going to, and verify if a separate letter for DLA and QRP is recommended)

Subj: PERSONNEL DESIGNATED TO ASSESS AND DOCUMENT EXPLOSIVES SAFETY STATUS

Ref: (a) NAVSEA OP 5, Volume 1, 7th Revision, Change 15 (verify most current version)

1. Per paragraph 13-15.7 in reference (a), the personnel listed below are qualified and authorized to inspect, assess and document the explosives safety status of the following types of material potentially presenting an explosive hazard (MPPEH); [list the specific types of MPPEH you will be inspecting, e.g., expended small arms brass, empty small arms containers/boxes, fired CADS, fired squibs, empty chaff/flare buckets, expended 20mm, mixed metal range gleanings, etc.] as safe or as hazardous. These individuals may sign material documented as safe (MDAS) and/or material documented as an explosive hazard (MDEH) documentation as either a certifier or verifier:

Name:	Rank/Rate/Grade:	Signature:
NAME		
NAME		
NAME		

2. In accordance with paragraph 13-15.5.1.3.c of reference (a), all MDAS documentation shall include the following statement:

"The material listed on this form has been inspected or processed by DDESB-approved means, as required by DOD policy, and to the best of my knowledge and belief does not pose an explosive hazard".

3. In accordance with paragraph 13-15.5.2.1.d of reference (a), all MDEH certification shall include the following statement:

"This certifies that the material potentially presenting an explosive hazard listed has been 100 percent properly inspected and to the best of my knowledge and belief presents an explosive hazard".

4. A copy of this authorization letter will be provided to any DLA or QRP (verify and indicate which receiving facility) receiving MDAS/MDEH and shall be updated annually, based on the issue date.

5. Point of contact is [activity representative] and can be contacted at (###) ###-####.

[CO/OIC PRINTED NAME]
CO/OIC Signature

Appendix 9: Munitions Rule (MR) and Explosive Hazardous Waste (EHW) Guidance

1.0 Explosive Hazardous Waste (EHW) and Waste Military Munitions (WMMs)

Installations in the Hampton Roads Area of Virginia do not currently or have never generated EHW, however, this section provides additional guidance in the event EHW is generated or Designated Disposition Authority (DDA) issues an urgent Notice of Ammunition Reclassification (NAR). Installation HWPM is to be contacted prior to generating an EHW or immediately upon issuance of an urgent NAR to ensure proper procedures for determinations, management/storage, transportation, and disposal requirements are met.

EHW (e.g. conventional and chemical military munitions) are generated when it has been determined when the explosive is no longer in use or cannot be reused, and intended to be discarded. EHW includes hazard class/ division 1.1, 1.2, or 1.3 WMMs and other munitions manufacturing, processing, or miscellaneous wastes. Explosive contaminated waste (including inert material such as rags, paper, wood, plastic, or metal contaminated with an explosive material) that meets the characteristic of reactivity, is managed and disposed of as EHW.

EHW and/or WMMs are required to be managed and disposed of in accordance with NAVSEA OP5 and 40 CFR 266 Subpart M. Disposal is required to be at a DoD permitted Treatment, Storage, and Disposal Facility (TSDF) unless it's an emergency response by Explosive Ordnance Disposal (EOD). Management of EHW are the same as HW procedures provided in this guide, with some conditional exemptions under 40 CFR 266 Subpart M.

1.1 References:

Below are references for additional guidance and procedures for EHW and WMMs.

1) NAVSEA OP5, Volume 1, Seventh Revision, Most Current Version. Ammunition and Explosive Safety Ashore.
2) DoD Manual 4715.26 (Most Current Version). DoD Military Munitions Rule (MR) Implementation Procedures.
    (a) This manual implements policy, assigns responsibility, and provides procedures to direct effective and consistent compliance with the military MR in accordance with 40 CFR 266, Subpart M.
3) DoD Manual 6055.09 (Most Current Version). DoD Ammunition and Explosives Safety Standards: Criteria for Unexploded Ordnance, Munitions Response, Waste Military Munitions, and Material Potentially Presenting an Explosive Hazard.

1.2 Military Munition

A military munition (regulated by the MR 40 CFR 266 Subpart M) is any item that meets all of the criteria below:

1) It is an ammunition product or component such as confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DOD components, including bulk explosives and chemical warfare agents, chemical munitions, rockets, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof; and it is

2) Produced or used by or for DOD or the U.S. armed services for national defense and security (including military munitions under the control of the DOD, the U.S. Coast Guard, the U.S. Department of Energy, and National Guard personnel); and

3) The production or use of the item is for national defense and security.

Military munitions that are excluded from the definition of a military munitions:

1) Wholly inert items, defined as those munitions or munitions components that have never contained reactive materials.

2) Improvised explosive devices, defined as devices fabricated in an improvised manner that are designed to destroy, disfigure, distract, or harass and that consist of explosive, destructive, lethal, noxious, pyrotechnic, or incendiary chemicals. These non-standard devices may be made from military or non-military materials.

3) Nuclear weapons, devices, and components.

1.3 Waste Military Munition (WMM)

Military munitions (used and/or not used) are not a WMM when:

1) In inventory to be used for intended purpose,

2) Components are being processed for resource, recovery, and recycling (R3),

3) Used for training,

4) Used for Research, Development, Testing, and Evaluation (RDT&E),

5) Items (range debris, UXO, RDT&E residue, etc.) are still being managed on an operational range,

6) Scrap metal and processed scrap metal that will be recycled.

Unused military munitions are a WMM when:

1) Abandoned.

2) Removed from storage for treatment.

3) Damaged or deteriorated.

4) DDA declares it.

Used military munitions are a WMM when:

1) Removed from range or site of use.

2) Buried or landfilled.

3) Landed off-range and not recovered.

1.4 Identification and Characterization of EHW

DDA is the only personnel in the DOD authorized to declare unused military munitions as EHW, except in the case of an explosive or munitions emergency, abandoned munitions, or a declaration by the Authorized Military Official (AMO). The generator of EHW is required to perform an accurate waste determination (same procedures provided in this guide) to determine the composition of an EHW before it is placed in an accumulation area. When necessary, EOD and/or NOSSA can assist with generator knowledge by using:

1) Known Composition. In almost all instances, the hazardous constituents and characteristics of EHW are known. Munitions in inventory are designated with a DOD Identification Code (DODIC) or Navy Ammunition Logistics Code (NALC). Local inventory managers and/or EOD can use the DODIC and/or NALC to look up the filler constituents.

   (a) If identification is impossible via labeling, marking, DODIC/NALC, etc., and the item appears unstable or decomposed (e.g., crystals or exudation has formed and its visual appearance offers no further assistance for its identification), then the item will be handled and treated as a safety emergency (Level 1) by EOD (emergency procedures discussed below).

2) Publications. EOD and NOSSA have multiple resources and publications that may be used to identify and support an items physical and chemical characteristics.

1.5 EHW Storage and Transportation

All applicable HW storage and transportation provided previous in this guide apply to EHW. However, 40 CFR 266 provides Conditional Exemptions (CEs) if certain criteria are met for storing and transporting non-chemical WMM. This exemption is conditional in that compliance with certain criteria and requirements set forth in 40 CFR 266.205 must be met. This CE requires an initial regulatory notification which must be done thru the installation HWPM.

1.6 Explosives or Munition Emergency Response

EOD provides immediate response to control, mitigate, or eliminate the actual or potential threat encountered during an explosives or munitions emergency. An explosives or munitions emergency response may include in-place render-safe procedures, treatment or destruction of the explosives or munitions, or their transport to another location to be rendered safe, treated, or destroyed. Reasonable delay (i.e. necessary, unforeseen or uncontrollable circumstances) in the completion of an explosives or munitions emergency response do not terminate the explosives or munitions emergency. Explosives and munitions emergency responses can occur on either public or private lands and are not limited to DOD installations.

When EOD personnel conduct an emergency response, they may determine that:

1) An immediate response is required (Level 1). In this situation, according to 40 CFR 270.1 (c)(3)(i)(D), the MR's immediate response exemption from RCRA permitting applies.

2) An immediate response is not required (Level 2), but the situation poses an imminent and substantial risk to human health or the environment. In this situation, the MR's immediate response exemption from RCRA may not apply. EOD should consult with the installation HWPM or Installation EV Department/Director.

3) An emergency response is not required. In these situations, continued support by the EOD emergency response specialists may not be required and the items may or may not be EHW.

1.6.1 Level 1 Explosives or Munitions Emergency Response

EOD personnel will use established procedures and good judgment to determine whether a situation requires a Level 1 response. Once the situation is determined as a Level 1 emergency, only EOD personnel are authorized to conduct Level 1 responses. Environmental permitting is not required. EOD personnel will take whatever action is necessary to control or eliminate the immediate threat. Such actions may include the movement (transport) of an item to a safer

location for defusing, detonation, or the performance of render-safe procedures. EOD personnel are the only authority that can determine when a Level 1 response is terminated.

When extenuating circumstances (e.g., adverse weather, nightfall, safety) delay actions necessary to terminate an explosives or munitions emergency, the response may be delayed until the necessary action can be completed. EOD personnel, with the assistance of the installation ESO and Security Protection Forces, must ensure the explosives or munitions are in a safe and secure environment.

Once EOD personnel determine the Level 1 response is over, remaining WMM (if any) must be collected and the installation HWPM and/or EV Department/Director must be notified to determine whether it should be managed as HW. The HWPM will coordinate with EOD personnel to dispose of any HW according to federal, state, and local regulations. EOD personnel, upon completion of the emergency response, shall prepare an incident report, and retain this report for a minimum of three (3) years. The report shall identify the dates of the response, the responsible persons responding, the type and description of material addressed, and its disposition.

1.6.2 Level 2 Explosives or Munitions Emergency Response

EOD personnel must determine whether the response action can be delayed until an emergency permit can be obtained without compromising safety or the environment. Once the situation is determined as a Level 2 emergency, EOD must contact the installation HWPM, and the HWPM is required to contact the VDEQ to obtain an emergency RCRA permit by telephone and immediately follow-up with a written request according to 40 CFR 270.61. After receiving the emergency permit, EOD personnel or the contractor may conduct the Level 2 response.

EOD personnel will take whatever action is necessary to control or eliminate the imminent and substantial endangerment threat. Such actions may include the movement (transport) of an item to a safer location for defusing, detonation, or the performance of render-safe procedures. Once EOD personnel determine the Level 2 response is over, remaining WMM (if any) must be collected, and the HWPM and/or EV Department/Director must be notified to determine whether it shall be managed as HW. The HWPM will coordinate with EOD personnel to dispose of any HW in accordance with all Federal, State, and Local regulations.

EOD personnel, upon completion of the emergency response, will prepare an incident report and will retain this report for three (3) years. The report shall identify the dates of the response, the responsible persons responding, the type and description of material addressed, and its disposition.

1.6.3 Unexploded Ordnance (UXO) Response

It is very common to find UXO during the Navy's installation restoration activities implemented through the CERCLA program. However, when UXO is found outside this scope of work, contact EOD personnel and installation HWPM and/or IEPD immediately.

1.6.4 Pre-Planned EOD Support

If EOD personnel determine that emergency responses are not required for a situation, EOD may still be requested to handle the EHW. However, if disposal support is requested from EOD, the installation HWPM and/or EV Department/Director shall ensure that the operations are in accordance with Federal, State, and Local regulations.

Planned Munition Response Sites (MRSs) are generally well characterized (i.e., both the types of munitions-related activities that occurred at the site and the type of munitions most likely present

are well understood) before beginning a munitions response, explosives or munitions emergencies will not normally occur during planned responses. However, there may be exceptions (e.g., an encounter with a munition with an unknown liquid fill, an encounter with an unexpected munition, an unexpected encounter during munitions response actions where intrusive or ground disturbing activities were not planned, an encounter with a munition that cannot be safely addressed at the MRS) that will require an explosives or munitions emergency response.

1.7 Training

Training listed below is **not** all inclusive of the explosive safety-training requirements; please refer to NAVSEA OP5 Appendix D for all explosive safety-training requirements. Contact installation HWPM and ESO for any additional guidance on training requirements.

1.7.1 Military Munitions Rule (MMR) Awareness

All personnel who are involved in handling of WMM are required to complete **annual** MMR Awareness Training in accordance with NAVSEA OP5 Appendix D. Training module is located on the NeL website https://learning.nel.navy.mil/. The MMR of RCRA identifies when conventional and chemical military munitions become HW and subject to Subtitle C of RCRA, and provides for the safe storage and transportation of such waste. The MMR integrates the principles of environmental protection, munitions management, and explosives safety into a regulatory scheme for WMM management.

1.7.2 Munitions Potentially Presenting an Explosive Hazard (MPPEH)

All personnel who are involved in handling of WMM and MPPEH are required to complete **annual** MPPEH Training in accordance with NAVSEA OP5 Appendix D. Training module is located on the NeL website https://learning.nel.navy.mil/. The potential for MPPEH to present an explosive hazard is the single characteristic that distinguishes it from other DOD material to be reused, excessed, recycled or otherwise disposed. Although other requirements, such as trade security and demilitarization, may apply to MPPEH and also affect its management, the potential explosive hazards associated with MPPEH make it unique and must be addressed prior to its transfer within or release from the DON.

1.7.3 Hazardous Waste (HW) Management

All personnel who are involved in generating and managing HW (including WMMs, EHW, etc.) are required to complete **annual** HW management training in accordance with 40 CFR 262 and 265. Training module is located on ECATTS (**Appendix 7**). VDEQ has acknowledged that the Navy's ECATTS web-based software as acceptable HW training for personnel.

1.7.4 Additional Potential Training

1) Ammo-18-DL and/or Ammo-49-DL

   (a) Personnel who are involved in the handling of WMMs is required to complete Ammo-18-DL or Ammo-49-DL training in accordance with NAVSEA OP5 Appendix D. Completion of either is a one-time only, however, activities may require this course as a refresher for personnel who have been away from ordnance supervisor or management duties for a year or more. This training is web based and is available online at website http://www.dactces.org/.

2) Ammo-18-DL Basic of Naval Explosives Hazard Control

3) Ammo-49-DL Naval Explosive Safety for Supervisors/Manager