

1. **PURPOSE.** Provide general policy and procedures for supported units who use and/or generate Hazardous Material (HM)/Hazardous Waste (HW) at PTA.

2. **APPLICABILITY.** This annex is applicable to all supported units.

3. **DEFINITIONS.**

a. **Hazardous Material:** Any material, which because of its quantity, concentration, physical, or chemical characteristics may pose a substantial hazard to human health or the environment when transported in commerce, stored, or otherwise managed.

b. **Hazardous Waste (HW).** A HW is defined as any waste, be it solid, liquid, or contained gas, which may pose a hazard to human health or may pollute the environment due to its quantity, concentration, or characteristics. A HM becomes a HW when it is no longer useable for its intended purpose and must be discarded. A waste is a hazardous waste if it is listed (see 3b.(1) below) or meets any of the characteristics described in sections 3b.(2) - 3b.(5) below.

(1) **Listed Wastes (Toxic and Acute Hazardous Wastes):** Known substances, which affect the proper functions of a human organism, where prolonged exposure may result in death (e.g., methyl ethyl ketone (MEK), trichloroethylene (TCE), lindane). These wastes are listed in 40 CFR, section 261.31 to 261.33.

(2) **Ignitability:** A solid waste that is a liquid, having a flashpoint below 1400 F. A solid waste that is an ignitable compressed gas as defined in 49 CFR 173.300 or an oxidizer as defined in 49 CFR 173.127 is also an ignitable waste. Ignitable wastes are assigned the EPA waste code D001 (see 40 CFR section 261.21)(e.g., waste paint, paint thinner, calcium hypochlorite, etc.).

(3) **Corrosively:** Having a pH less than or equal to 2, or greater than or equal to 12.5, as determined by a pH meter. Corrosive wastes are assigned the EPA waste code D002 (see 40 CFR section 261.22)(e.g., battery acid, caustic cleaners). Aqueous solutions with a pH of 0 to 7 are acidic (acids); aqueous solutions with a pH of 7 to 14 are basic (bases)(caustic). Acids and bases are incompatible with each other and should never be stored together.

(4) **Reactivity:** A material that is normally unstable and readily undergoes violent change without detonating or it reacts violently with water. Reactive wastes are assigned the EPA waste code D003 (see 40 CFR, section 261.23) (e.g., obsolete ammunition, explosives, unbalanced lithium batteries).

(5) **Toxicity:** Extract of the waste fails the Toxic Characteristic Leaching Procedure (TCLP), using specified test methods, that equals or exceeds the concentration of contaminants listed and may release toxic substances or cause a poison hazard to human health or the environment. Toxic wastes are assigned EPA waste codes varying from D004 through D043 (see 40 CFR, section 261.24).

c. **Minor Spills:**

(1) Releases of any oil, paints and non-hazardous substances, that are stored and used at each activity or facility, and that can readily be contained and cleaned-up by available activity personnel.

APVG-GP-T

SUBJECT: Annex U (**Environmental Compliance**) to Pohakuloa Training Area (PTA) External Standing Operating Procedures (SOP).

(2) Minor spills involve small quantities of POL (less than 25 gallons) , paints or hazardous substances (less than 1 gallon) that do not require advanced personnel protective equipment (respirators, full body suits, decontamination) released indoors, to the ground, or to paved areas.

(3) It also includes quantities of less than those items specified in Appendix F, EPA Designation, Reportable Quantities, and Notification Requirements for Hazardous Substances Under CERCLA (40 CFR Subpart J, Part 302).

\*If there is any question regarding if the spill is a major or minor spill, assume the spill is a major spill.

d. Major Spills:

(1) Any release of a POL, hazardous substance, or hazardous waste that enters or has the potential to enter a water body, storm drain, drainage ditch, or sewer manhole

(2) Any release of more than 1 gallon of a hazardous substance/waste to the ground.

(3) A release of a petroleum product in excess of 25 gallons (or any quantity where assistance from the Installation Response Team (IRT) is needed for responding to the spill).

(4) Spills felt to be beyond the capabilities of activity personnel or equipment.

(5) Any spill that exceeds quantities of items listed in Appendix F, EPA Designation, Reportable Quantities, and Notification Requirements for Hazardous Substances Under CERCLA (40 CFR Subpart J, Part 302).

4. POLICY AND PROCEDURE.

a. No refueling operations will be established without the prior approval of the PTA Environmental Compliance Office (ECO).

(1) A request for refueling form will be completed prior to conducting refueling operations. This form is good for one site only. Additional sites will require new forms.

(2) A refueling site inspection checklist will be completed by the refueler during initial setup. The checklist will be submitted to range control prior to fuel operations. A copy of the checklist will be maintained on site.

(3) All fuel units must coordinate with PTA ECO for a clearance inspection when permanently departing their designated fuel site. This inspection will be accomplished within 24 hours of departure.

b. The unit Spill Response Plan, submitted at D-30, will detail HM inventory, MSDS's, response resources and procedures. Minimum plan requirements are outlined in par 5a below.

c. Supported units will remove all hazardous materials (i.e. oil, solvents, etc.) generated during their deployment prior to or upon redeployment. PTA does not have the resources to assist supported units with the retrograde/disposal of hazardous material. All units must deploy to PTA with the resources required to respond to any HM/HW issue of their making.

APVG-GP-T

SUBJECT: Annex U (**Environmental Compliance**) to Pohakuloa Training Area (PTA) External Standing Operating Procedures (SOP).

d. Used hazardous materials (i.e. solvents, etc.) that are in serviceable condition will be contained in approved DOT containers and transported back to Home Station with the proper hazardous material documentation for continued use.

e. Any fuel drained for maintenance purposes will be contained in clean containers to allow for reuse in vehicles/equipment.

f. POL-contaminated soil/Non-Regulated Waste (i.e. dirt contaminated with oil, diesel, anti-freeze, etc.) resulting from spills must be contained in DOT approved containers and transported back to the home station for proper disposal as non-regulated waste.

g. Hazardous wastes (i.e., soil contaminated with solvents, mogas, etc.) and any listed HW that exhibit the following characteristics of ignitability, corrosively, reactivity, toxicity and can no longer be used in its intended purpose shall be containerized in DOT approved containers and reported to the DPW, Environmental Compliance Office, PTA for final disposition. At a minimum, unit ECO/Alternate will provide completed Hazardous Waste Profile Sheets, Material Safety Data Sheets (MSDS) or (MSDS serial Number as listed in the Hazardous Material Information System), and DD Form 1348-1. Turn-in procedures at the PTA Transfer and Accumulation Point (TAP), located at the PTA Bulk Fuel Facility, will follow guidance provided in the PTA TAP SOP.

## 5. SUPPORTED UNIT RESPONSIBILITIES.

a. Each deployed Task Force or separate unit is required to submit a Spill Response Plan at D-45 to the Range Division-Hawaii ECO. Upon review the plan is forwarded to PTA Operations for approval by the PTA Range Supervisor by D-30. Approval or rejection will be given by D-25. The spill plan will be tailored specifically to the unit operations during the PTA deployment. The Spill Response Plan will include, at a minimum, the following items:

(1) Name, rank, duty position, level of training, and phone number for the personnel responsible for the following during the deployment:

(a) Hazardous Materials and Hazardous Wastes

(b) Motor Pool Operations

(c) All Fueling Operations

(d) Spill Response Coordinator

(2) Inventory and MSDS's of all Hazardous Materials deployed to PTA. Material is subject to verification/ inspection upon arrival at PTA.

(3) Inventory of clean up supplies and equipment deployed to PTA.

(4) Spill response procedures, which cover all aspects of your operation(s) (i.e., refueling, vehicle maintenance areas, chemical disbursement, etc.).

APVG-GP-T

SUBJECT: Annex U (**Environmental Compliance**) to Pohakuloa Training Area (PTA) External Standing Operating Procedures (SOP).

(5) Unit authorizing date, name, rank and signature. (on cover sheet)

(6) PTA review date, name of reviewer and signature. (on cover sheet)

b. Spill Kits. Units will deploy to PTA with adequate spill response supplies for each vehicle, generator, maintenance and storage site. A recommendation of spill kit(s) contents is listed in Appendix 1 to Annex U as outlined in the Spill Response Supply List. These should be considered minimum requirements.

c. Support. It is requested that a trained Environmental Compliance Officer from the unit work with the PTA operations office. This individual will assist the PTA Environmental Compliance Office with the day-to-day inspections and compliance issues regarding the unit(s).

d. Inspections. The supported unit logistics officer or designee will coordinate three (3) inspections of assigned areas (motor pool, vehicle staging, and field refueling) with PTA Environmental Compliance as follows:

(1) Initial - Prior to arrival of deployed unit vehicles. This inspection will identify pre-existing condition of assigned areas.

(2) Redeployment - After training is completed and unit has performed self-inspection and clean up. This inspection will identify unsatisfactory cleanup efforts.

(3) Post Clearing - After discrepancies identified in redeployment inspection have been corrected. This inspection will verify that discrepancies noted in the redeployment inspection have been corrected. This inspection must be accomplished to clear PTA.

e. Motor pool work and parking areas, vehicle staging areas, and field fueling areas will be clearly marked by the using unit identifying the unit and its' boundaries of responsibility.

f. Inventory will include: Item name (common and chemical), quantity, and MSDS. A list, by type and quantity, of HM/HW cleanup material and equipment must be included, (i.e., DOT approved containers, absorbent pillows, booms/dikes, shovels, etc.). Cleanup material and equipment must be suitable to handle all types of HM on hand and HW potentially generated. A finalized HM inventory shall be submitted to PTA Operations upon arrival.

g. Supported units are responsible immediately reporting all spills IAW paragraph. 6 of this Annex. Units, containerize, label, and retrograde all HM/HW generated from spills. The unit will clean up, properly package, label, and present for turn-in, IAW para 4 this annex, all HM/HW generated from any spill.

6. SPILL RESPONSE. **All** spills which occur in Training Areas, on trails / roads within these areas, or at the compound at Kawaihae Docks will be reported immediately to PTA Range Control. All other spills will be reported to PTA DA Police, ext. 425 (commercial 969-2425). The "Uncontrolled POL and Hazardous Material/ Waste/Air Pollutant Spill Notification Form" will be used to report spills. The On-Site Spill Coordinator is responsible for coordinating spill response and mitigation of the spill area in addition to ensuring the safety of all personnel under his/her supervision. A written report of the spill and cleanup actions taken will be provided to the PTA Environmental Compliance Officer within 24 Hrs.

APVG-GP-T

SUBJECT: Annex U (**Environmental Compliance**) to Pohakuloa Training Area (PTA) External Standing Operating Procedures (SOP).

In the event that a unit is unable to mitigate a spill utilizing its available resources, the On-Site Spill Coordinator will immediately contact Range Control or DA Police and request additional support from PTA.