



Aviation Maintenance Waste Management Guide

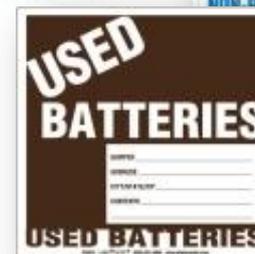


Aircraft maintenance procedures use many different hazardous materials including adhesives, sealants, epoxies, solvents and paint. The application of these materials generate waste products that may be regulated by federal and/or state environmental regulations.



Typical Aviation Maintenance Waste Streams:

- Used Oil
- Used JP-8
- Used POL Rags
- Used Alcohol Rags
- Used Acetone Rags
- Used Alodine Rags
- Paint/Adhesive Mixing Cups & Applicators
- Used Batteries





Used Rags (Aircraft Maintenance)

Rags used for maintaining aircraft are managed differently than those used for ground support equipment.

Store used rags in the hangar in closable metal containers, separated by the process for which the rags are used. The most common processes for aircraft maintenance are (CONTAINERS MUST BE MARKED AS LISTED BELOW):

- Used Alcohol Rags
- Used POL Rags
- Used Acetone Rags
- Used Alodine Rags (if applicable)

Used rags placed in these containers are reusable and must be reused to their fullest extent (without becoming saturated) before they are collected for disposal.

Once the rags become unusable, they must be turned in to the ECO for collection in the HWSSP.





Used Rags (Aircraft Maintenance)

- NEVER leave Waste Aviation Maintenance Rags in unmarked bags.
- NEVER dispose of Waste Aviation Maintenance Rags in the trash
- NEVER store Waste Aviation Maintenance Rags in the RMSSP. The only authorized storage location for Waste Aviation Maintenance Rags is the HWSSP.
- NEVER transport Waste Aviation Maintenance Rags from one hangar to another hangar. They must be stored at or near the point of generation.
- ALWAYS keep containers of Waste Aviation Maintenance Rags CLOSED. No overflowing containers of rags! Contact the ECO to transfer rags to the HWSSP before the Used Rags container gets overfilled.





Paint/Adhesive/Sealant Mixing Cups & Applicators

Establish a designated area where two-part paints, adhesives and sealants can be mixed.

The proper equipment must be available:

- gloves,
- mixing cups
- brushes/sponges (for paint)
- sticks (for adhesives/sealants)
- marking pen





Paint/Adhesive/Sealant Mixing Cups & Applicators

When mixing any material, be sure to mark the cup with the following:

- Name of the material/FSC
- Date
- Time mixed



FSC codes:
8010: Paint
8030: Sealant
8040: Adhesive

MIX THE SMALLEST AMOUNT POSSIBLE for the job you are doing.
Leave the remainder on the mixing table so that others may use it if it has not yet cured.

The mixing table must be checked, at a minimum, at the end of each work shift.

Any mixing cups and applicators that are no longer usable must be collected and turned in to the ECO immediately.

The ECO will place the cups and applicators in a collection drum at the Hazardous Waste Shop Storage Point (HWSSP).





Mixing Cups & Debris

FSC codes:
8010: Paint
8030: Sealant
8040: Adhesive



Step 1. Mix smallest amount of material as possible. Label cup with name of material/FSC, date & time mixed.



Step 2. Leave remaining amount on mixing table for possible reuse.



Step 3. Check table for materials that are no longer usable and turn-in to ECO immediately.



Step 4. ECO places waste mixing cups, applicators and debris into clear plastic bags in accumulation drum in the HWSSP. Drums must be kept closed.



Step 5. ECO calls DPW ENV for pickup before exceeding the 55-gal limit.

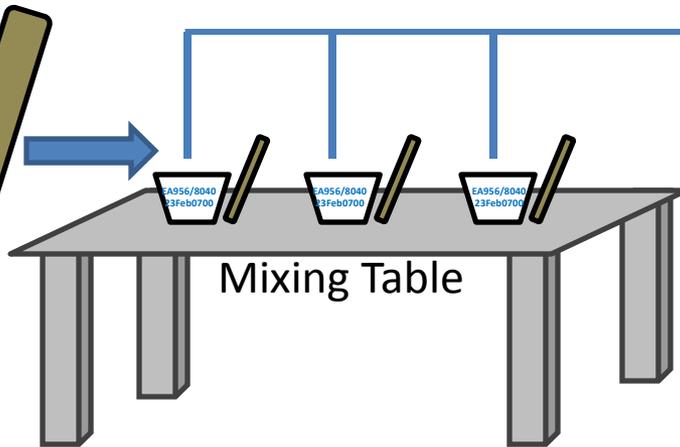


FSC codes:
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Aviation Maintenance Debris Management

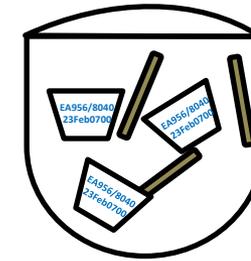
FSC (ex: 8040)
Material Name
Date/Time Mixed

Mixing Cup & Applicator
 (brush, stick, sponge,
 syringe, q-tip, etc.)



Mixing Table

"Debris" includes cups,
 applicators, gloves, tape,
 paper, etc.



Collect in clear plastic bags and
 place in HWSSP

HW Collection Log

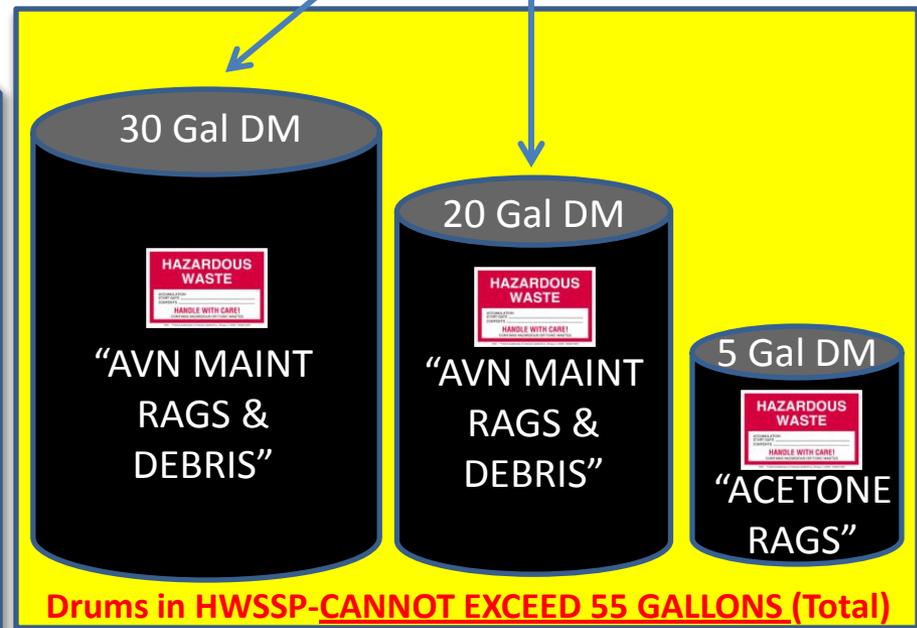
Step 1: Mark mix cup with the material name, FSC (first 4 numbers of NSN), date and time mixed.

Step 2: At mixing table, mix the smallest amount possible, apply, and return cup for others to use.

Step 3: If no longer usable or at the end of each shift, ECO will collect unusable cups, applicators and other debris in clear plastic bags in a drum in the HWSSP and complete the HW Collection Log. ALL BAGS MUST BE STORED IN THE DRUMS!

Step 4: When drum is nearing capacity *call DPW ENV TAP for pickup: 656-3097.

***Hazardous Waste must be transferred from the HWSSP to the TAP by DPW ENV before it reaches the 55-gallon HWSSP limit.**



QUESTIONS? CALL DPW ENV @ 656-0866



Fuel Sample Procedures

Fuel Samples should be collected in approved containers that are **labeled “USED JP-8”**.

1. Take a properly labeled empty fuel sample jar, personal protective equipment (PPE) (e.g. gloves and goggles) from the fuel sample polypack to the aircraft to take fuel sample.
2. After the fuel has been inspected, immediately empty it into an approved fuel sample collection container (e.g. jerry can) in the polypack. Contaminated fuel should be transferred to the USED JP-8 drum at the RMSSP.
3. Store empty jar in the polypack.
4. Once the fuel container is full, the used JP-8 should be transferred into support equipment that uses JP-8, for example, an AGPU, Tug, Gator, etc.



Fuel Sample Polypack





Used Batteries



Tape terminals on smaller tactical batteries

- EVERY battery that has been determined to be unserviceable must have the words **“USED BATTERY”** marked on it along with the **“DATE”** the battery was taken out of service.
- Smaller batteries may be placed in a box marked **“USED BATTERY”** along with the **“DATE”** the first battery was placed in the box. Battery terminals must be taped.
- Keep the batteries on secondary containment (if non-AGM) with a collection log and make sure the batteries are turned in within 6 months of the date marked.
- Cracked batteries must be turned in to the ECO to be packaged for turn-in.



Hazardous Material Management

Policy Memorandum USAG-HI-19, Authorized Use List (AUL):

- The AUL is a **30-day supply of authorized Haz Mat** a unit/activity can store and use at their facility. Units establish their own AUL. Must be approved by the DPW Environmental Division.

- All HM on the AUL must be obtained and **bar-coded through the Hazardous Material Control Point (HMCP, ER6040).**

HMCP will not issue materials not listed on the AUL or quantities exceeded those listed on the AUL.

- If HM is not available from the HMCP and must be purchased through an outside source, it must be approved before purchase and then brought to the HMCP to be bar-coded.

- **NEVER USE UNAUTHORIZED HAZARDOUS MATERIALS!**





EMPTY* Containers

**EMPTY=no more than 3% by weight of the total capacity remains in the container*

All **EMPTY** hazardous materials containers must be turned back in to the ECO so they can be turned-in to the HMCP.

Units will not receive a new container of Haz Mat until the empty container has been returned to the Hazardous Materials Control Point (HMCP).

Special Instructions for Empty Oil Containers:

1. Cut top off
2. Drain or rinse container in solvent tank

All **EMPTY** Haz Mat containers must be given to the ECO to be turned-in to the HMCP.

If the Haz Mat container is not empty: USE IT! If it can no longer be used, turn it in to the ECO ASAP!





Excess, Expired, or Unusable Materials



All *suspected* **EXCESS, EXPIRED** or **UNUSABLE** hazardous materials must be **turned-in to the ECO immediately.**

The ECO must evaluate the material to see if it is still usable or if it is a waste.

- **Excess materials:** May be turned back in to supply (HMCP) for re-issue.
- **Expired materials:** Shelf life may be extended through the HMCP. Call the HMCP @ 656-0720 with the NSN, lot #, and batch # for extension information.
- **Unusable materials:** Materials that are no longer usable for their intended purposes are WASTE. The ECO must determine what type of waste (e.g. HAZARDOUS WASTE, NON-REGULATED WASTE) has been generated and how it must be managed.
 - **HAZARDOUS WASTE:** Must be marked “HAZARDOUS WASTE” and placed in the HWSSP.

UNITS WILL BE CHARGED FOR THE DISPOSAL OF MISMANAGED/EXCESS/EXPIRED HAZ MAT.



Pohakuloa Training Area



- DO NOT TRANSPORT **HAZARDOUS WASTE** FROM POHAKULOA TRAINING AREA (PTA) BACK TO OAHU!!
- All HAZARDOUS WASTE and USED OIL generated at PTA must be turned in to the Environmental Compliance Managers at PTA.
- PTA DPW Environmental Compliance Office:
 - Bldg T-179
 - Program Manager: David “Mac” McBride
 - TAP Manager: Gina Robello
 - 808-969-2515





Points of Contact

Hazardous Waste Program Manager

• 656-7001

Hazardous Waste Pickup/Disposal

• 656-3097

Authorized Use List

• 656-2277

Used POL Pickup

• 656-0386

Environmental Inspections

• 656-0866

Environmental Training Classes

• 656-0866

Emergency Spill Line

• 656-1111

<http://www.garrison.hawaii.army.mil/sustainability/Environmental.aspx>