

Chapter 1

INTRODUCTION

1. Purpose and Scope

a. This regulation documents the ORARNG Hazardous Materials and Waste Management Program (HMWMP) and provides procedures for minimizing the amount of materials used and waste generated through pollution prevention (P2) efforts. It applies to:

- all ORARNG units, personnel, facilities, and operations throughout the state
- all state and federal civilian employees of the ORARNG
- tenants and tenant activities
- military training exercises conducted by the Oregon Air National Guard (ORANG), United States Army Reserve (USAR), or other active or reserve units at ORARNG facilities or training sites
- other public or private users of ORARNG property.

2. Reviews and Revisions

The Environmental Program Manager (EPM) will review this regulation at least once every two years, modify material and waste handling procedures as necessary, and staff proposed changes for review and approval. The Adjutant General will review and approve changes in this regulation.

3. Applicable Regulations

a. See ORARNG Pam 200-1 for regulations that apply to the applicable environmental program areas. Additional regulations that pertain to HM/HW management are:

(1) Joint Service Manual - DLAI 4145.11/TM 38-410, *Storage and Handling of Hazardous Materials*

(2) Local Regulations, Ordinances, and Codes

(3) Uniform Fire Code with Oregon Amendments, 1997

4. Contractual Obligations

The ORARNG routinely contracts for services related to environmental compliance such as waste transportation and disposal. These contracts may include requirements that are more stringent than the regulations. The ORARNG will comply with all HW Disposal contractor restrictions that do not violate any regulations, order, ordinance or code. Environmental contracting will be conducted through AGI-ENV.

5. Description of ORARNG Operations

a. The ORARNG provides organized, trained, and equipped units to execute assigned state and federal missions. The ORARNG's federal mission is to provide combat-ready forces to mobilize in support of National Military Strategy. Secondly, the ORARNG protects life and property and preserves peace, order, and public safety under state authorities.

b. The ORARNG manages ARNG training sites and maintains military vehicles and equipment. This includes operating surface maintenance facilities (CSMS, OMS, OMSS and UTES), aviation maintenance facilities (AASF), armories, and other facilities throughout the state. The hazardous waste generator status and DEQ ID Number for each ORARNG facility where they have been assigned is provided in Chapter 5, Managing Hazardous Waste, Waste Protocol Sheets.

6. Responsibilities

NOTE: Consult ORARNGR 200-1 Chapter 1-9, and ORARNG Pam 200-1 Chapter 1-4 which are incorporated by reference in this regulation in addition to Chapter 1 paragraph 6 to determine all applicable responsibilities. Additional responsibilities are outlined below.

a. **SHOP FOREMEN AND FACILITY MANAGERS** will:

- (1) Assign a Facility EPOC in writing, by name in accordance with ORARNG Pam 200-1.
- (2) Ensure the EPOC, to the extent practicable, is a full-time employee in order to assure continuity in coordination, accomplishment of tasks, and monitoring of environmental compliance.
- (3) Ensure the EPOC has the necessary resources to perform his/her environmental duties.
- (4) Ensure the coordination of efforts for facilities with more than one EPOC.
- (5) Facility Managers at armories collocated with an Organization Maintenance Shop (OMS) will cooperate with the appropriate Shop Foreman in accomplishing overall HW management. Command coordination will be provided through the higher headquarters of affected units at the armory and the parent unit of each OMS.
- (6) Provide proper protective clothing and equipment to employees, as required per current SAO-S guidance.

b. **STATE MAINTENANCE WORKERS** will:

Comply with the requirements of this regulation and the responsibilities as listed below for the Environmental Point of Contact as they apply to State Maintenance functions. The SMW is the primary POC for the State Fire Marshal Hazardous Substance Inventory.

c. **ENVIRONMENTAL POINT OF CONTACT.** AR 200-1, chapter 1, and ORARNG Pam 200-1 requires that EPOCs be assigned at appropriate levels. If an EPOC is unable to perform his/her duties it is the responsibility of the appropriate appointing authority to assign a new EPOC that is able to perform the duties of an EPOC. Consult ORARNG Pam 200-1 for a complete listing of EPOC duties in addition to those duties listed below:

- (1) Determine management activities required by this Management Plan.
- (2) Ensure all appropriate personnel are trained IAW ORARNG Pam 200-1.
- (3) Ensure a HW accumulation area has been designated.
- (4) Ensure a Material Safety Data Sheet (MSDS) is available for each HM identified in the monthly HM inventory.
- (5) Conduct weekly inspections of HW accumulation areas.
- (6) Maintain records of inspections and repairs made at the accumulation point for at least three years.
- (7) Comply with all reporting requirements outlined in chapter 8.
- (8) Practice good housekeeping in daily operations. Keep work areas, waste accumulation areas, and waste containers clean. Clean up spills immediately and report spills as required.
- (9) Comply with the requirements outlined in this regulation.
- (10) Coordinate lab testing as required and maintain a record of all lab analysis reports generated in determining if wastes are HW.
- (11) Retain copies of lab reports or other test results dealing with HW for at least three years from the date the HW was shipped off-site (40 CFR 262.40(c)). These records will be kept with the HW Determination Worksheets for the facility.
- (12) Act as the Emergency Coordinator IAW 40 CFR 262.34(a)(4) and (d)(5).
- (13) Act as the Point of Contact (POC) in dealing with regulatory agency visits and inquiries. Respond to higher headquarters requests for information regarding HM use, or solid and HW generation, management, and disposal.
- (14) Develop an overall SOP for the facility to ensure a coordinated effort is maintained in HM and HW management by all generators at the site.
- (15) Maintain and implement the facility contingency plan for dealing with HM

spills or other accidents as applicable. Coordinate spill response beyond generator capability to clean up and dispose of spilled material and other contaminated materials. Coordinate with AGI to review cause of the spill and investigate procedural or facility response to spills, including isolating and collecting spill residues until tested to determine appropriate disposal.

(16) Identify and order supplies and equipment as needed at each facility for HW management and spill response.

(17) Notify the facility manager/supervisor of any problems associated with being able to comply with applicable regulatory requirements.

(18) If your facility is a Small or Large Quantity Generator attempt to make arrangements for support with local emergency response agencies, as described below, and as appropriate for the type of waste handled at the facility and the potential need for the services of their organizations. Requirements are found in 40 CFR 265.37.

d. **TRANSPORTERS OF HW** will:

(1) Armories, Army Aviation Support Facilities, Regional Training Institute, Oregon Military Department, BIAK and Camp Adair will transport HW to the supporting OMS, per Chapter 5, without complying with manifesting requirements, but must comply with the requirements of 49 CFR Parts 170-177 if applicable. Approval from the supporting OMS must be obtained prior to transporting the HW. See Chapter 6 for turn-in requirements.

(2) Inspect shipments prior to loading to ensure use of proper containers, labels, and manifests.

(3) Segregate and secure incompatible wastes and other materials within the transporting vehicle. Secure the load in the vehicle IAW 49 CFR 177.834.

(4) Placard the vehicle IAW 49 CFR 171.3, 49 CFR 172, Subpart F, and other applicable regulations.

(5) "Sign" and "date" the manifest when the shipment is loaded and ready to leave the facility. Leave the "Generator Copy" with the facility representative.

(6) Transport the HW, with completed documentation to Supply Distribution Center (SDC)-Warehouse or other designation, as appropriate. An appointment must be made to conduct a turn-in of HW/HMs.

(7) Report, contain, and clean up HW spills in accordance with ORANR 210-6, Spill Contingency Plan.