

ENTERED

departments and/or DRMR Safety Engineer. MHE used to handle hazardous materials must conform with the requirements in 29 CFR 1910.178(C).

5. Property management must be skillful and diligent in matching resources to work load to ensure that available warehousing resources meet the day-in day-out requirements of the work load. SOPs contained in Encls 2 through 8 provide guidance for efficient processing of the various requirements confronting the Warehouse Section. The property management element, together with the Chief, DRMO, are expected to assess and control this work load by:

a. Scheduling receipts in accordance with DRMS-H 4160.3, volume I, chapter IV.

b. Scheduling outloading actions for sales releases and reutilization, transfer, and donation (R/T/D) issues.

c. Coordinating property relocations to sales areas, scrap yard, DEMIL areas, and so on.

V. FLOW CHART AND SOPS.

A. Flow Chart. A system flow chart reflecting DRMO storage operations is enclosed (Encl 1). Detailed flow charts are provided as attachments to each SOP (Encls 2 through 8).

B. Standard Operating Procedures (SOPs).

1. Until standardization of position classification titles can be accomplished, it should be noted that the position titles in the SOPs herein are examples only. Where differences in position titles exist, SOPs will be adjusted to reflect local position titles.

2. References to organizational entities are in terms of "Branch" or "Section." It should be understood that in DRMOs which have consolidated organizational structures (reference DRMS-M 5810.1, Organization, Mission, and Functions) the term "Function" should apply.

3. Off-site branches will comply with the SOPs contained in Encls 2 through 8 except that the documents received/generated by their operation will be accumulated on a weekly cycle basis and submitted via first class mail or courier to the DRMO Documentation Branch for processing.

VI. DRMO ENVIRONMENTAL CONSIDERATIONS.

A. General. DRMOs will ensure that hazardous property is stored in facilities where adequate measures have been taken to assure personal safety, accident prevention, and detection of potential environmental spills or damages which might occur.

B. Compatible Storage. Hazardous property will be segregated for storage into the basic storage groups listed in Encl 12. Just how far apart to store each group and whether or not separation by dike, wall, etc., is required depends upon the degree of incompatibility between the hazardous property in



Ch 1
DRMS-M 4160.5

each of the basic groups. Storage limitations for flammables and combustible liquids are found in Encl 6 to DRMS-M 4100.2. DRMOs should obtain this segregation guidance from either the DRMR or the host environmentalist or safety officer. Examples of potentially incompatible hazardous property, which can serve as a basis for DRMR guidance, are found in 40 CFR 264 and 265, appendix V.

C. Conforming Storage. DRMOs will not accept accountability of hazardous property unless the property has been properly identified, packaged, labeled, and certified in conformance with established criteria. Further, physical custody of hazardous property is subject to the following guidelines:

1. If DRMS possesses conforming storage at the DRMO (as defined by the DEQPPM 80-5 and determined by the Conforming Storage Checklist), physical custody will be accepted when accountability is assumed.

2. If DRMS does not possess conforming storage at the DRMO and the generating activity has conforming storage in support of mission requirements as determined by the Conforming Storage Checklist, the generating activity will retain physical custody and DRMS will accept accountability.

3. In those instances where neither DRMS nor the generating activity possesses conforming storage, the activity with the "most nearly" conforming storage, as determined by the Conforming, Most Nearly Conforming Storage Checklist Rating System, will have physical custody of the hazardous property (hazardous materiel/hazardous waste). The conforming storage criteria are found in Encl 13.

D. Accelerated Disposal Cycle. Hazardous property will undergo either a 60-day cycle (used hazardous materiel/all hazardous waste and unused hazardous materiel that has the appearance of having been opened or tampered with) or a 120-day cycle (unused hazardous materiel). Implementation of this policy has accelerated the processing of hazardous property inventories at the DRMOs and relieved impacted storage space.

E. Inspection and Repackaging Actions. Hazardous property surveillance will be accomplished weekly (40 CFR 264.174) (unless foreign state or local laws require more frequent inspection) to identify leaking, bulging, or corroded containers. If leakers are found, they should be placed into overpack drums immediately. DRMOs will provide for any required repackaging or handling of hazardous property subsequent to acceptance of accountability from the generating activity. Generally, this will be accomplished by host installation

or service contractor personnel rather than DRMO employees. If it becomes operationally necessary for the DRMO to repackage, the DRMR Safety and Health Office will be contacted to determine if the personal protective equipment on hand at the DRMO is adequate for the substance(s) to be handled.

F. Containers

1. After acceptance by the DRMO, no hazardous material/hazardous waste shall be mixed into a single container, unless prior approval is obtained from the DRMR environmental and safety representatives.

2. Rigid containers should be stored in an upright condition and off the ground or floor in an orderly way so as to permit ready access and inspection.

G. Current Inventory List. There will be a current inventory list maintained in the warehouse for each basic storage compatibility group. As additional hazardous property is received in the DRMO warehouse, the name and date received will be added to the list. As property leaves the DRMO by disposition, its name and date will be deleted (crossed off) from the inventory list.

VII. MANHOOR AND WORK UNIT REPORTING

A. The requirement for accurate and timely reporting of manhours expended and work units produced cannot be overemphasized. These data are the heart of the DLA/DRMS Management Systems and provide the basis for numerous management decisions relative to the justification and distribution of resources.

B. Manhour and workload reporting requirements for DRMO storage operations are defined in DRMS-H 7000.1, Management Information System Reference Guide.

C. Manhour and work unit reporting will be accomplished IAW the procedure contained in DRMS-M 4160.9, Administrative Functions at the Defense Reutilization and Marketing Offices.

For information only

From your Defense Reutilization & Marketing Office (Mr. Fermin Montoya 4-0125)

FACT SHEET

SUBJECT: Waste Verification Testing Program (H/W Testing after DRMO Acceptance)

BACKGROUND: The hazardous waste testing program was implemented as a result of requirements under 40 CFR 264.13 and, in some cases, stricter state standards. DRMS has contracted with the Defense Industrial Supply Center (DISC) to perform testing of wastes turned into the DRMOs/OSBs.

DISCUSSION:

- 0 Enclosure 1 lists all DRMOs and OSBs which are currently on line for waste verification testing.
- 0 The following references are provided for the waste verification testing program:
 - 0 DRMR-OOH letter, 08 Aug 88 subject: Verification Testing at DRMOs/OSBs through DISC. (Cover letter for):
 - 0 DRMS-HT letter, 25 Jul 88 subject as above.
 - 0 DRMS-HT letter, 09 NOV 87 subject: Waste Analysis Plans
 - 0 DRMR-OOH letter, 07 Nov 86 subject: Approval to Require Lab Analysis from Turn-in Activities
 - 0 DRMS-HT letter, 10 Apr 86 subject: Resource Conservation and Recovery Act (RCRA) Permits - Waste Analysis Plan
 - 0 Standard Operating Procedure, Processing misidentified Property, Oct 85. Waste verification testing procedure begins on page 7 step 36.
- 0 Procedure for the use of the waste verification testing program:
 - 0 The waste verification testing program was designed to do random sampling of waste turned into the DRMO, in most instances this is still the case, however it may be expanded in the future to accommodate the requirements of some regulators to test all waste received at the storage facility.
 - 0 Classification of Hazardous Wastes to be Sampled
 - 0 Group I wastes are those wastes for which no laboratory analysis is required. This includes wastes in unopened, original manufacturers containers, plus paints and reagent

grade chemicals in previously opened, original containers. If inspection determines that all containers have their original labels and have not been opened, the shipment will be accepted as Group I wastes. If the shipment is paint and reagent grade chemicals in opened containers, each container will be inspected to ensure that there are no separated phased or settled solids in the paint, or that other wastes have been mixed in. If not, these items will also be considered Group I wastes. Additionally wastes accompanied by a lab analysis would also be considered group I.

0 Group II wastes are those hazardous wastes which are not included in Group I, i.e. used solvents.

0 Sampling frequency

0 For off-site turn-in activities transferring property to the DRMO once or more per month, sampling will be performed once per month.

0 For off-site turn-in activities transferring property to the DRMO less than once per month, sampling will be performed at each turn-in

0 Problem generators may be sampled more frequently to build a data base to back a requirement that the generator test all waste prior to turn-in.

0 Number of Samples

0 Initially, schedule A of enclosure 2 shall be used to determine the number of samples. If the analysis of these samples agrees with the generators identification for three consecutive samplings, then sampling can be conducted in accordance with schedule B of enclosure 2. Schedule B can continue to be used until test analysis results for a shipment do not verify the generators identification. If such a discrepancy is found, schedule A will be used again until three consecutive samplings occur without disagreement between test results and the generators identification.

0 Sampling requests

0 Place a call to Mr. Rick Herpal, DISC representative AV 442-6804 and provide him with the following information:

0 Amount of samples to be taken.

- 0 Any special requirements beyond the standard RCRA tests, i.e. PCBs, heavy metals.

- 0 Processing the test results, the DRMO will compare results from the sample analysis to the generators identification of the hazardous waste. If the results for all items tested agree with the generators identification, continue processing the shipment. If results for any item tested disagree with the generators identification, the shipment will be rejected, except for those items whose identity was verified as correct. In addition to the rejection standard procedures, the commander of the turn-in activity will be notified by letter of the items needing correction.

- 0 Recordkeeping, the following items should be included in on the waste analysis record form:
 - 0 DTID numbers of items sampled
 - 0 Drum numbers of items sampled
 - 0 Total number of drums in shipment
 - 0 Date items sampled
 - 0 Date results received
 - 0 Confirmation of test results
 - 0 Contract number
 - 0 Copy of analysis

- 0 Conclusion: The Waste Verification Testing Program is simple to use. With this tool we can impress upon our generators the importance of proper identification, and is intended to be used as a means of establishing professional working relationships, not a club with which to beat our generators.

ENCLOSURE 1

WASTE VERIFICATION TESTING PROGRAM
DRMOs/OSBs ON LINE AS OF AUG 30 88

DRMOs:	ALAMEDA	KIRTLAND
	ANCHORAGE	LEWIS
	BARSTOW	LUKE
	BLISS	MCCLELLAN
	CANNON	MINOT
	COLORADO SPR.	NELLIS
	EL TORO	NORTON
	ELLSWORTH	ORD
	FAIRBANKS	PENDLETON
	GRAND FORKS	PORT HUNEME
	GREAT FALLS	TOOELE
	HILL	TUCSON
	HOLLOMAN	
OSBs:	CHINA LAKE	NORTH ISLAND
	DENVER	OGDEN
	EDWARDS	PUEBLO
	FAIRCHILD	PUGET SOUND
	F.E. WARREN	REESE
	FORT HUACHUCA	SIERRA
	GEORGE	UMATILLA
	LONG BEACH	VANDENBERG
	MARE ISLAND	WHIDBEY ISLAND
	MOUNTAIN HOME	YUMA

ENCLOSURE 2

Number of Samples to be Collected as
a Function of the Number of Items
in the Shipment

Schedule A

<u>Shipment Size</u>	<u>Number of Samples to be Taken</u>
2 to 8	2
9 to 15	3
16 to 25	5
26 to 50	8
51 to 90	13
91 to 150	20

Schedule B

<u>Shipment Size</u>	<u>Number of Samples to be Taken</u>
2 to 8	1
9 to 15	2
16 to 25	2
26 to 50	3
51 to 90	5
91 to 150	3