

Chapter 1. Introduction

This Hazardous Materials and Waste Management Plan, hereafter referred to as the HMWMP or the Plan,) prescribes policies, responsibilities, and procedures for storing and managing hazardous materials (HM), recyclable materials and wastes within the Ohio Army National Guard (OHARNG). The plan is written to ensure OHARNG compliance with applicable federal, state, and local laws and regulations as specified in Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*. This plan supersedes the Adjutant General of Ohio Pamphlet (AGOH PAM) 200-1 dated July 2005 and all previous versions. Only the online version of this plan posted to the OHARNG Environmental Homepage on TAGNET will be deemed current, all other copies will be marked **reference only**.

This plan is formatted like an Army Technical Manual (TM), with easy-to-follow procedures and many visual cues. To use this plan, look on the front cover to see what chapter contains the needed information and then flip to the tab for that chapter or check the Table of Contents for the specific subject.

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1.1 Purpose and Scope

This Plan documents the OHARNG Hazardous Materials and Hazardous Waste Management Programs. It applies to the following:

- a. All activities under OHARNG command.
- b. All activities that generate waste while using OHARNG training sites.
- c. All training conducted outside the State of Ohio or on active duty installations within the state, unless host activity regulations or standard operating procedures dictate otherwise.
- d. All activities permanently located on active duty installations, unless host activity regulations or standard operating procedures dictate otherwise.

e. Restoration activities on all installations, training sites or ranges, including other locations under OHARNG ownership or operation unless otherwise specified by a Memorandum of Understanding (MOU), Memorandum of Agreement (MOA), Inter-service Support Agreement (ISSA), or as specified by the Environmental Program Manager.

1.2 Reviews and Revisions

The Environmental Office Hazardous Waste Manager will review the Plan at least once every two years and, if necessary, make necessary modifications as required due to regulatory, military and operational changes. The Adjutant General (TAG) will administer, oversee, review, and approve any changes or modifications to the Plan.

1.3 Applicable Regulations

State Regulations

The Ohio Public Employment Risk Reduction Program, managed by the Ohio Bureau of Workers' Compensation, enforces regulations for handling and storing hazardous materials (HM). The Ohio Environmental Protection Agency (Ohio EPA) enforces regulations for hazardous waste (HW) generation and management specific to Ohio. State HW regulations are codified in the Ohio Administrative Code (OAC), Chapter 3745. The Ohio Department of Transportation (ODOT) enforces regulations for transportation of HM. This Plan complies with the following:

- a. OAC 3745-19 (open burning)
- b. OAC 3745-20 (asbestos)
- c. OAC 3745-27 (scrap tires and infectious waste)
- d. OAC 3745-49 through 57 and 3745-59 for (Hazardous Waste)
- e. OAC 3745-58 (recyclable materials)
- f. OAC 3745-71 (lead)
- g. OAC 3745-273 (universal waste)
- h. OAC 3745-279 (used oil)
- i. OAC 3745-400-04 and 05 (construction and demolition debris)
- j. OAC 4167 (hazardous materials)

Federal Regulations

The OHARNG must manage hazardous materials (HM) in accordance with (IAW) Occupational Safety and Health Administration (OSHA), Department of Transportation (DOT), and Emergency Planning and Community Right-to-Know Act (EPCRA) regulations and guidelines. Waste must be managed IAW the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments (HSWA). Additional requirements for handling special waste types are required by the Toxic Substances Control Act (TSCA) and the Federal Insecticide Fungicide, and Rodenticide Act (FIFRA). The Federal Facilities Compliance Act (FFCA), another RCRA amendment, further requires that all Department of Defense (DoD) federal enclaves comply with federal hazardous waste (HW) laws and regulations.

Title 40 of the Code of Federal Regulations (CFR) codifies federal solid waste management regulations. The U.S. Environmental Protection Agency (EPA) Region 5 enforces these regulations, except in cases when the state of Ohio has primacy (state regulations referred to in the previous section). This plan provides procedures for complying with the following parts of 40 CFR:

- a. Part 260 through Part 272 (hazardous waste)
- b. Part 273 (universal waste)
- c. Part 279 (used oil)
- d. Part 61, Subpart M (asbestos)
- e. Part 761 (polychlorinated biphenyls (PCBs))

The OHARNG also must comply with the following regulations for hazardous materials:

- a. 49 CFR Parts 105 through 180(U.S. Department of Transportation (DOT) requirements)
- b. 29 CFR Part 1910 (U.S. Occupational Safety and Health Administration (OSHA) requirements)

Military Regulations

The OHARNG must comply with Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, dated 13 December 2007, which contains Army policy for HM and HW management. Specifically, this plan provides procedures for complying with Chapter 7 (Pollution Prevention), Chapter 9 (Materials Management), and Chapter 10 (Waste Management) of AR 200-1. DA PAM 710-7, *Hazardous Material Management Program*, dated 25 June 2013, provides standards for centralized control and management of hazardous materials. In addition,

the OHARNG must comply with DoD Regulation 4500.9-R, known as the Defense Transportation Regulations (DTR) when transporting HM across public roadways.

Executive Orders

The OHARNG must also comply with Executive Order 13693, *Planning for Federal Sustainability in the Next Decade*, dated 19 March 2015.

Local Regulations, Ordinances, and Codes

AR 200-1 requires compliance with local environmental regulations. This includes National Fire Protection Association codes as required by local fire departments. Consult with the OHARNG Environmental Office regarding local regulations. In the absence of specific regulations, use Best Management Practices (BMP) to minimize the amount of hazardous substances released to the environment.

1.4 Contractual Obligations

The OHARNG routinely contracts for services related to environmental compliance. Services include waste analysis, transportation, and disposal. Contracts may include requirements that are more stringent than OHARNG regulations. The OHARNG will comply with all HW disposal contract restrictions that do not violate any regulation, order, ordinance, code, or other regulatory requirement.

1.5 OHARNG Environmental Office Contacts

Table 1-1. Environmental Office Contacts

Adjutant General’s Department ATTN: NGOH-IMR-ENV 2825 West Dublin Granville Road Columbus, Ohio 43235-2789	
Title	Commercial Phone Number
Environmental Program Manager	(614) 336-7095
State Environmental Supervisor	(614) 336-7395
Fort Ohio Environmental Supervisor	(614) 336-6568
Hazardous Waste Manager (HWM)	(614) 336-7394
Fort Ohio Environmental Compliance	(614) 336-4918
EPAS Assessors	(614) 336-7329 or (614) 336-7079

1.6 Description of OHARNG Operations

The OHARNG provides organized, trained, and equipped military units to execute assigned federal and state missions. Their federal mission is to provide and mobilize combat-ready forces in support of national military strategy. The OHARNG protects life and property, preserves peace and order, and provides public safety missions under state authorities.

The OHARNG manages facilities for mustering troops and supplies, active training sites, military vehicle and equipment maintenance shops, and restoration locations. This includes operating maintenance facilities such as the Combined Support Maintenance Shop (CSMS), the Army Aviation Support Facilities (AASF), Field Maintenance Shops (FMS), Unit Training Equipment Sites (UTES), U.S. Property and Fiscal Office (USPFO) Warehouse, local armories or armed forces readiness centers (AFRC), and other similar facilities throughout the state.

1.7 Responsibilities

All references to legal requirements in this plan refer to the laws, rules, regulations, and executive orders applicable to the OHARNG. Responsibilities defined in this plan apply to the management of hazardous materials and hazardous waste and the implementation of pollution prevention and source reduction initiatives. Staff responsibilities are defined as follows:

The Adjutant General (TAG)

- a. Ensures compliance with all applicable aspects of Department of Defense (DoD) environmental policies and programs.
- b. Ensures compliance with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- c. Establishes and emphasizes environmental policy for the OHARNG.
- d. Establishes and emphasizes environmental management system (eMS) policy for the OHARNG IAW ISO14001 guidelines.

Assistant Adjutant General (Army) (ATAG)

- a. Assumes the duties and responsibilities of TAG in his/her absence.
- b. Ensures compliance with all applicable aspects of the Department of the Army (DA) environmental policies and programs.

- c. Ensures compliance with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- d. Ensures resources are available to implement the OHARNG Environmental Program.
- e. Establishes the Environmental Quality Control Committee (EQCC), which oversees compliance with environmental laws and regulations and reviews and approves recommendations and decisions made by the EQCC.
- f. Establishes policies and guidance to protect and conserve environmental resources.
- g. Ensures environmental impacts are considered during planning and execution of the OHARNG mission.

Chief of Staff (CoS)

- a. Ensures the TAG's and ATAG's environmental policies are implemented across the force.
- b. Ensures units and activities appoint a Primary and Alternate Facility Environmental Coordinator.
- c. Ensures units and activities appoint a Primary and Alternate Environmental Compliance Officer (ECO).
- d. Co-chairs
the EQCC.
- e. Serves as the eMS Manager.

Deputy Chief of Staff-Logistics (DCSLOG)

- a. Serves as a member of the EQCC.
- b. Ensures all OHARNG logistics and maintenance operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- c. Appoints appropriate staff to the eMS Cross-Functional Team and ensures participation in the annual eMS Aspects and Impacts Analysis process.
- d. Ensures environmental impacts are considered during planning and execution of all DCSLOG missions.

Deputy Chief of Staff-Logistics, Command Transportation Office (DCSLOG-CTO)

- a. Ensures all OHARNG transportation operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- b. Coordinates review and documentation of proposed changes to transportation operations with the OHARNG Environmental Office to ensure compliance with environmental policies, regulations, and best management practices.
- c. Provides “Hazardous Materials Familiarization and Safety in Transportation” (AMMO-67) training as required (every two years) and to new personnel.
- d. Ensures senior transportation office staff participation in the annual eMS Aspects and Impacts Analysis process.

Deputy Chief of Staff-Logistics, Logistics Management Officer (DCSLOG-LMO)

- a. Ensures all OHARNG logistics operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- b. Coordinates review and documentation of proposed changes to logistics operations with the OHARNG Environmental Office to ensure compliance with environmental policies, regulations, and best management practices.
- c. Ensures logistics personnel that routinely handle hazardous materials and hazardous waste attend the annual Hazardous Materials and Hazardous Waste Management course.
- d. Ensures senior logistics staff participation in the annual eMS Aspects and Impacts Analysis process.
- e. Ensures waste generation is minimized whenever possible by utilizing alternative source reduction techniques, pollution prevention technology, green procurement opportunities, and recycling initiatives.

Surface Maintenance Officer (SMO)

a. Ensures all ongoing OHARNG surface maintenance operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.

b. Coordinates review and documentation of proposed changes to surface maintenance operations and activities to ensure compliance with environmental policies, regulations, and best management practices.

c. Ensures vehicle and equipment maintenance personnel that routinely handle hazardous materials and hazardous waste attend the annual Hazardous Materials and Hazardous Waste Management course.

d. Ensures senior SMO staff participation in the annual eMS Aspects and Impacts Analysis process. Participation will include representatives from the FMSs, the CSMS, and the UTES.

e. Ensures waste generation is minimized whenever possible by utilizing alternative source reduction techniques, pollution prevention technology, green procurement opportunities, and recycling initiatives.

f. Ensures that all OHARNG petroleum, oil and lubricant (POL) storage, transfer, and dispensing activities at the FMSs, CSMS, and UTES are conducted IAW OHARNG standard operating procedures (SOPs) and all applicable federal, state, and local requirements.

g. Ensures all FMSs, the CSMS, and the UTES appoint a Primary and Alternate Environmental Compliance Officer (ECO). Copies of the appointment memorandums will be forwarded to the Environmental Office's Hazardous Waste Manager.

State Aviation Officer (SAO)

a. Ensures all ongoing OHARNG aviation operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.

b. Coordinates review and documentation of proposed changes to aviation operations and activities to ensure compliance with environmental policies, regulations, and best management practices.

- c. Ensures aviation personnel that routinely handle hazardous materials and hazardous waste attend the annual Hazardous Materials and Hazardous Waste Management course.
- d. Ensures senior aviation staff participation in the annual eMS Aspects and Impacts Analysis process. Participation will include representatives from the AASFs.
- e. Ensures waste generation is minimized whenever possible by utilizing alternative source reduction techniques, pollution prevention technology, green procurement opportunities, and recycling initiatives.
- f. Ensures that all OHARNG POL storage, transfer and dispensing activities at the AASFs are conducted IAW OHARNG standard operating procedures (SOPs) and all applicable federal, state, and local requirements.
- g. Ensures AASFs appoint a primary and alternate Environmental Compliance Officer (ECO). Copies of the appointment memorandums will be forwarded to the Environmental Office's Hazardous Waste Manager.
- h. Serves as a member of the EQCC.

Assistant Quartermaster General (AQM)

- a. Ensures all ongoing OHARNG state facility maintenance, repair, and construction operations and activities, to include asbestos abatement and lead remediation project, are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- b. Ensures all ongoing OHARNG state procurement operations and activities, are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- c. Coordinates review and documentation of proposed changes to state facility maintenance, repair, and construction operations and activities to ensure compliance with environmental policies, regulations, and best management practices.
- d. Ensures facilities maintenance and repair personnel that routinely handle hazardous materials and hazardous waste attend the annual Hazardous Materials and Hazardous Waste Management course.
- e. Ensures senior quartermaster general staff participation in the annual eMS Aspects and Impacts Analysis process.

- f. Co-chairs the Environmental Quality Control Committee (EQCC),.
- g. Ensures the OHARNG eMS policy and significant environmental aspects are communicated to vendors and contractors conducting business with the OHARNG.

Construction and Facilities Management Officer (CFMO)

- a. Ensures all ongoing OHARNG federal facility maintenance, repair, and construction operations and activities, to include asbestos abatement and lead remediation project, are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- b. Ensures all ongoing OHARNG federal procurement operations and activities, are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- c. Ensures waste generation is minimized whenever possible by utilizing alternative source reduction techniques, pollution prevention technology, green procurement opportunities, and recycling initiatives.
- d. Coordinates review and documentation of proposed changes to federal facility maintenance, repair, and construction operations and activities to ensure compliance with environmental policies, regulations, and best management practices.
- e. Ensures senior CFMO staff participation in the annual eMS Aspects and Impacts Analysis process.
- f. Serves as the eMS Advisor.
- g. Serves as a member of the EQCC.
- h. Establishes the qualified recycling program IAW the Ohio Qualified Recycling Program Business Plan dated 12 Dec 12, ensuring adequate resources are available to sustain the program.
- i. Manages the OHARNG pest management program, utilizing innovative integrated pest management techniques to meet source reduction goals.
- j. Manages the OHARNG solid waste management program, ensuring waste generation is minimized whenever possible to include employment of alternative source reduction techniques, pollution prevention technology, green procurement opportunities, and recycling initiatives to meet waste diversion goals.

Environmental Program Manager

- a. Reviews OHARNG operations and activities to ensure they are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.
- b. Manages the HW program IAW with all applicable federal, state, and local environmental laws and regulations.
- c. Manages the qualified recycling program IAW the Ohio Qualified Recycling Program Business Plan, dated 12 Dec 12.
- d. Under the direction of the CFMO, serves as the subject matter expert for and adviser to the TAG, the EQCC, and the OHARNG on HW management issues, policies, and programs.
- e. Develops HW management procedures, policies, regulations, and best management practices to ensure OHARNG compliance with all applicable federal, state, and local environmental laws and regulations.
- f. Coordinates, consults, and cooperates directly with federal, state, and local authorities and regulatory agencies to ensure the OHARNG remains in compliance with applicable solid and hazardous waste management requirements.
- g. Conducts annual eMS Aspects and Impacts Analysis.
- h. Conducts annual HM and HW Management course.
- i. Reports solid and hazardous waste generation and disposal data to the Department of Defense through National Guard Bureau.
- j. Ensures resource requirements are identified and secured for the management of solid waste and HW programs; including funds for equipment, studies, operational costs, maintenance costs, treatment, storage or disposal, and waste minimization.
- k. Conducts annual compliance and eMS assessments utilizing the Environmental Performance Assessment System (EPAS), developing and implementing corrective action plans to address noted deficiencies.
- l. Coordinates and conducts quarterly EQCC meetings, serving as subject matter experts and technical advisors to the EQCC.
- m. Serves as the eMS Facilitator.

- n. Coordinates emergency spill response efforts.
- o. Manages and coordinates implementation of the Integrated Pest Management Program

United States Property & Fiscal Officer (USPFO)

a. Ensures all ongoing OHARNG federal procurement operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.

b. Ensures all ongoing OHARNG federal property management operations and activities, to include the management of fuel and ammunition, are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.

c. Coordinates review and documentation of proposed changes to federal procurement and property management operations and activities to ensure compliance with environmental policies, regulations, and best management practices.

d. Manages funds derived from the sale of recyclable commodities and contracts to sustain the OHARNG recycling program IAW the Ohio Qualified Recycling Program Business Plan dated 12 Dec 12.

e. Ensures USPFO personnel that routinely handle hazardous materials and hazardous waste attend the annual HM and HW Management course.

f. Ensures the USPFO Warehouse appoints a primary and alternate ECO. Copies of the appointment memorandums will be forwarded to the Environmental Office’s Hazardous Waste Manager.

g. Ensures senior USPFO staff participation in the annual eMS Aspects and Impacts Analysis process.

h. Ensures the OHARNG eMS policy and significant environmental aspects are communicated to vendors and contractors conducting business with the OHARNG.

- i. Serves as a member of the EQCC.

Environmental Compliance Officer (ECO)

Ensures unit operations and activities are conducted IAW with all applicable federal, state, and local environmental laws and regulations, and OHARNG environmental policies and programs, to include the guidelines and best management practices outlined in this plan.

Facility Environmental Coordinator (FEC)

a. Serves as the point of contact for environmental issues at the facility under his/her control. At multi-unit armories and facilities, the parent unit Administrative Officer will be appointed the FEC. In single unit armories, the Readiness NCO will be appointed. The FEC at training sites will be the training site manager. At maintenance facilities, the shop chief or facility commander will be appointed, unless co-located with an armory.

b. Identifies environmental resource needs for his/her facility.

c. Executes environmental requirements as they affect his/her facility.

d. Ensures environmental awareness and compliance of workers at their facility.

e. Reports violations and deficiencies to the Environmental Office through the chain of command.

f. Must have access to all areas where HMs and wastes are generated, stored, and/or accumulated.

Environmental Quality Control Committee (EQCC)

a. Advises TAG on hazardous material and waste management priorities, policies, strategies, and programs.

b. Reviews annual compliance and eMS assessments conducted by the Environmental Office and approves corrective action plans required to address noted deficiencies.

c. Convenes quarterly, or as necessary.

Safety and Occupational Health Manager (SOHM)

a. Prescribes and provides proper personal protective equipment (PPE) to ensure the safety of OHARNG personnel while conducting the environmental compliance program.

b. Prescribes and reviews proper safety equipment for managing the health and safety program.

c. Funds and implements Hazard Communications (HAZCOM) training and other training requirements to ensure compliance with federal, state, and Army safety standards.

- d. Serves as a member of the EQCC.

1.8 Submitting Changes to this Plan

Any suggestions, comments, or proposed changes regarding this plan should be forwarded to the Hazardous Waste Manager for consideration. This plan is maintained as an electronic eMS document on the OHARNG Environmental Management System website. All other versions, copies or printed versions of the plan are obsolete. Printed copies are to be used as **reference only and marked accordingly**.