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Department of Military Affairs  
Office of the Adjutant General  
St. Paul, Minnesota  
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Minnesota Army National Guard (MNARNG)  
Guard Regulation 200-3

Effective 1 June 2001

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**Hazardous and Special Waste Management Requirements**

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By Order of The Adjutant General:

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The Adjutant General

Official:

(Original Signed)  
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**Summary.** This regulation provides guidance for the management of hazardous and special waste generated at MNARNG facilities.

**Applicability.** This regulation applies to all MNARNG personnel, organizations, activities and all other organizations, units and activities when utilizing MNARNG property.

**Suggested Improvements.** The proponent agency for this regulation is, State of Minnesota, Department of Military Affairs, Office of the Adjutant General, Attn: MNAG-FMO-E, 15000 Highway 115, Little Falls, MN 56345-4173. Users are invited to send comments and suggested improvements on DA Form 20809 (Recommended Changes to Publications and Blank Forms) directly to the proponent.

**Distribution.** "A" ARMY

**Changes: This regulation supercedes MNGR 420-47 and any other predated MNGR 200-3.**

**HAZARDOUS AND SPECIAL WASTE MANAGEMENT**

This directive, dated April 2001, has been prepared to replace previously published versions of the MNGR 200-3. This directive will apply only to facilities that are Very Small Quantity Generators (VSQG's). See Figure 4-4 to determine if your facility is a VSQG.

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**CHAPTER 1****INTRODUCTION****1-1 PURPOSE**

This directive prescribes MNARNG Very Small Quantity Generator (VSQG) responsibilities, policies, documentation and procedures for the identification, handling, storage, transportation and disposal of hazardous and special wastes. Figure 4-4 lists all VSQG facilities that must abide by this directive. Figure 4-4 also lists Small Quantity Generators (SQG's). The SQG's will abide by their own version of MNGR 200-3.

The procedures listed herein are intended to minimize present and future threat to human health and the environment, and to help assure the MNARNG manages its waste streams in compliance with applicable laws, rules and regulations.

The DOL Warehouse at Camp Ripley has been granted a license to operate as a VSQG Collection Program site for all MNARNG VSQG facilities. The SQG facilities are not permitted to utilize the DOL warehouse in this manner; however, the DOL warehouse can be utilized by SQG facilities as a transfer facility.

Additional guidance can be obtained on the use of this regulation by contacting the FMO-E or through viewing the three MNARNG video training courses titled: The Minnesota Guards Most Wanted; 10 ½ Steps to Compliance; and Spill Response Material Management and Prevention.

**1-2 AUTHORITY**

The Minnesota Waste Management Act (Chapter 115A) and the Federal Resource Conservation and Recovery Act (42 USC 6901 et. seq.) and the regulations established to implement these statutes (Minnesota Rules Chapters 7045 and 7046), require the proper management of hazardous wastes. Any person (agency, firm, etc.) who generates, transports, treats, stores, or disposes of hazardous wastes must comply with the policies and standards set in these statutes and regulations.

The MNARNG 200-1, Environmental Protection and Enhancement Regulation Army, also requires the development of Hazardous Waste Management Plans such as this document for all MNARNG facilities and activities.

**1-3 APPLICABILITY**

This directive applies to all personnel and activities within the Minnesota Army National Guard, this includes all VSQG facility personnel as well as federal and state civilian employees. Persons, units, or activities specifically mentioned, are not exempt from adhering to the intent and procedures contained in this directive.

**1-4 EXPLANATION OF THE SECTION ORGANIZATION OF THE MNGR 200-3**

- a. Orange Tabs. The Orange Tab sections, hereby referenced to by the corresponding Chapter numbers, contain the actual MNGR 200-3 regulation. All MNARNG personnel listed in Chapter 1-3 are required to know these regulations.

- b. Brown Tabs. The Brown Tab sections, which are called the Environmental Compliance Binder, contain all required records and documentation of hazardous and special waste activities. These records and documents must remain with the facility for the life of the facility. These records must be easily accessible and organized for review by outside regulating agencies and MNARNG staff. The plastic sleeves, found in the Brown Tab sections, are labeled with the name of the record or document that is to be placed in them.

#### **1-5 REQUIREMENTS FOR NEWLY ASSIGNED HAZARDOUS WASTE PERSONNEL**

When the Facility Environmental Coordinator (FEC) or Environmental Compliance Officer (ECO) is reassigned at the facility, the outgoing FEC or ECO must present all MNGR 200-3 records and documentation to the new FEC or ECO. Time must be taken to ensure that the new FEC or ECO understands the MNGR 200-3 regulatory requirements and environmental compliance record keeping procedures for that facility.

**CHAPTER 2****POLICIES****2-1 HAZARDOUS WASTE MANAGEMENT**

It is the policy of the Minnesota Army National Guard to manage hazardous wastes in an environmentally acceptable manner and in accordance with all Federal, State and local requirements. Through direct adherence to the most update version of this regulation, the MNARNG and state employees will ensure compliance.

**2-2 POLLUTION PREVENTION/WASTE MINIMIZATION**

It is the policy of the MNARNG to minimize to the extent practical, the amount and toxicity of hazardous wastes generated as a result of its activities.

- a. Waste minimization practices for the MNARNG VSQG's are as follows:
  - (1) Re-use of materials, whenever and as long as possible, before determining they are wastes;
  - (2) Recycling of degreasing solvents through a qualified and permitted contractor;
  - (3) Segregation of waste streams to avoid contamination of non-hazardous wastes;
  - (4) Minimization of the use of degreasing solvents for activities other than parts cleaning in tanks; and
  - (5) Substitution of less hazardous products (degreasing compounds and paints) where feasible.
- b. Pollution Prevention activities benefit the environment as well as the work environment of the troop. This activity is accomplished by reducing the amount of waste produced at its source. In turn, this activity reduces the amount of waste to be treated or disposed of, reduces the amount of funds expended for waste management and reduces the exposure of its troops to hazardous substances.
  - (1) MNARNG views soldier involvement as an essential element of MNARNG P2 policy. All MNARNG personnel are responsible for assisting in the identification, reduction and elimination of pollution at its source and to minimize the transfer of toxics from one environmental medium to another.
  - (2) MNARNG activities required to promote pollution prevention include, but are not limited to:
    - (a) Process modification,
    - (b) Inventory control,
    - (c) Feed stock substitution,
    - (d) Housekeeping/management policies, and
    - (e) Improved efficiency of technology.

**2-3 PLANS, RECORDS AND REPORTS**

- a. It is the policy of the Minnesota Army National Guard to maintain the plans and records for each hazardous waste generator at the facility, as required by law, and report to regulatory agencies through the Facilities Management Office-Environmental Section (FMO-E). VSQG facilities will:

- (1) Keep records required by law on site. Place records in the appropriate Brown Tab section.
  - (2) Report necessary information within the required time frame to the FMO-E for submission to regulatory agencies.
- c. Maintain the Facility Hazardous Waste Management (HWM) Plan and compliance records. This plan will meet with all applicable regulatory requirements.
  - d. A facility pollution prevention plan must also be maintained at the facility.
  - e. Required hazardous waste reports and the report due dates are found in Chapter 11.

#### **2-4 WASTE CHARACTERIZATION/EVALUATION/TESTING**

- a. Wastes with unknown characteristics will be tested before disposal. Testing will be performed in accordance with EPA approved test procedures.
- b. Testing and evaluations of waste streams will be performed by FMO-E or by contract services as directed by FMO-E.
- c. If operations or chemical use should change, thereby changing the composition of hazardous wastes generated, the FMO-E is to be notified immediately. Notify the FMO-E by using one of the following forms:
  - (1) Hazardous Substance Inventory (Form MNGR 200-3-1101), or
  - (2) MNGR 200-3-0803 for hazardous waste stream changes.
- d. Section 4-4 details disclosure procedures that are required to be followed for reporting new or changed waste streams.

#### **2-5 STORAGE**

VSQG's may store up to 100 kg or 220 gallons or 2200 pounds (approximately four barrels) of hazardous waste that is not considered acute hazardous waste at any one time.

**However, it is MNARNG policy to immediately arrange for the disposal of full containers** (See Section 6-3.b).

#### **2-6 TRANSPORTATION**

VSQG facilities must arrange pickup of their hazardous waste with the DOL warehouse. The DOL warehouse can either arrange to have the DOL express truck or other Minnesota licensed hazardous waste transporter, pick up the waste. The waste will then be delivered either to the DOL or to another state contracted TSD facility. Arrangements may also be made through the DOL warehouse to self transport material directly to them. Drivers from facilities that self transport, must complete MNGR 200-3-0705 prior to transport (see Figure 7-5 ).

#### **2-7 TURN IN TIME**

The DOL Warehouse operating hours are 0700-1630 Monday through Friday. VSQG's are required to arrange pickup or delivery of their waste to the DOL Warehouse a week prior to pickup or delivery.

#### **2-8 OBTAINING CONTAINERS, LABELS AND MANIFESTS**

Facilities must contact the DOL Warehouse to obtain the appropriate containers, labels, and shipping papers for their wastes.

**2-9 MSDS/HMIS Information**

When requesting materials/supplies for products requiring MSDS (Material Safety Data Sheets)/HMIS (Hazardous Material Information Sheets)MSDS/HMIS, it is the responsibility of the requisitioner to note this requirement for MSDS/HMIS on the material request form. If applicable, the following statement must appear on material requisitions: "A MSDS must accompany this product upon delivery." Procurement personnel (USPFO-MN or FMO-M) are not responsible to identify hazardous materials requiring a MSDS when initiating procurement actions but are required to provide when requested. When purchasing from a local vendor, ensure that an MSDS accompanies the product. This is the procurer's responsibility.

MSDS/HMIS information is to be obtained from one of the following sources:

- a. Source of procurement (DOL, FMO-M, state warehouse, stocked items only or local vendor)
- b. All OMS's and many TACC's have been provided the DOD CD Rom HMIS programs for obtaining this information for any item denoted by a National Stock Number (NSN)
- c. Many manufacturers provide product information phone numbers to call to obtain the information.
- d. If all other avenues have been exhausted to obtain this information, contact MNARNG-SOHM or MNARNG-FMO-E.

## CHAPTER 3

### RESPONSIBILITIES

#### **3-1 STAFF JUDGE ADVOCATE (SJA)**

The SJA will:

- a. Provide legal advice to FMO-E on environmental matters.
- b. Coordinate the representation of TAG and the State of Minnesota with the State Attorney General, or the local U.S. Attorney, before courts, administrative tribunals, and regulatory bodies.
- c. Serve as Department legal council.

#### **3-2 FACILITIES MANAGEMENT OFFICER (FMO-Z)**

The Facilities Management Officer is responsible to The Adjutant General for the execution of hazardous waste management programs within the Minnesota Army National Guard.

The FMO-Z will:

- a. Conduct duties as appointed federal fund manager for Hazardous Waste programs.
- b. Submit the Federal Environmental Hazardous Waste Operating Budget and execute the federal and state environmental program.
- c. Submit the Environmental Program Report (EPR) and Installation Status Report (ISR) to EXDIR for approval before submission to the NGB.
- d. Represent the Environmental Program at the Program Budget Advisory Committee (BBPAC).
- e. Ensure construction projects meet current environmental standards, and establish a plan/schedule for bringing existing facilities into compliance.
- f. Obtain and renew appropriate environmental licenses and permits for MNARNG facilities and activities. Hold signature authority as landowner for the Department of Military Affairs (DMA), when required on environmental licenses and permits.

##### **3-2.1 The FMO Department of Public Works (FMO-DPW)**

- a. Appointing personnel to be responsible for managing hazardous wastes generated by DPW's activities.
- b. Ensuring adequate availability of protective clothing and equipment for personnel handling hazardous wastes.
- c. Specifying and ordering supplies and equipment for hazardous waste management and spill response in coordination with the FMO-Safety and FMO-E.
- d. Monitoring employee work environment to ensure that personnel are safeguarded and wastes are properly managed.
- e. Determining the hazardous waste training required by maintenance personnel and scheduling the training in coordination with FMO-E.

##### **3-2.2 The FMO Environmental Section (FMO-E)**

The FMO-E will:

- a. Provide technical assistance and interpret laws and regulations related to hazardous waste management.

- b. Schedule sampling and analysis of unidentified wastes and establishing an ongoing waste analysis program.
- c. Classify wastes in accordance with Minnesota Rules 7045.0131 and 7045.0135, identifying proper descriptions to be used on labels and manifests, and designating proper marking and labeling for each type of waste.
- d. Prepare and submit environmental reports as required by state and federal requirements.
- e. Maintain and update a written training plan and conducting and/or arranging hazardous waste management training for Minnesota Army National Guard personnel in coordination with appropriate staff sections.
- f. Prepare and update hazardous waste management plans and records, guidance and regulations in coordination with other staff sections.
- g. Obtain and maintain identification numbers for Minnesota Army National Guard generators and transporters.
- h. Establish and update an inventory and waste classification document of all hazardous waste generated by the Minnesota Army National Guard.
- i. Coordinate with environmental regulatory agencies with the jurisdiction of hazardous waste management.

### **3-2.3 The State Employee Safety and Health Officer (FMO-Safety)**

The State Employee Health and Safety Officer is responsible for state employees that work at TACC's. (Section 3-5 lists the SOHM responsibilities for the MNARNG active duty, federal technicians and M-day soldiers). The State Employee Safety and Health Officer implements State and Federal Occupational Safety and Health Administration (OSHA) requirements. The following are some of the responsibilities:

- a. Determining the clothing and protective gear required to safeguard employees during handling of hazardous wastes.
- b. Advising the work supervisor to ensure that conditions, acts and practices does not degrade the personal safety of any employee.
- c. Assisting facility managers in obtaining material safety data sheets for chemicals used in their workplace.
- d. Program management for hazardous material use and storage as described by OSHA standards.
- e. Direct the state employee Occupational Health program. The program will:
  - (1) Provide state employees OSHA employee right to know training and record maintenance.
  - (2) Manage state employee medical surveillance program and records.
  - (3) Provide Material Safety Data Sheet (MSDS) for materials purchased by the state supply system.
  - (4) Conduct indoor air monitoring at state facilities.
  - (5) Maintain hazardous material/substance inventory.
  - (6) Prescribe proper hazardous chemical storage facilities and storage guidance.
  - (7) Provide state employees proper personal protective equipment (PPE).

### **3-3 DIRECTOR OF LOGISTICS (DOL)**

The DOL will:

- a. Coordinate proposed logistical plans, equipment maintenance plans and equipment fielding with FMO-E for integration of environmental requirements.
- b. Act as the point of contact for all matters involving the transportation of hazardous substances, hazardous wastes and recyclable materials and coordinate compliance with applicable regulations.
- c. Provide proper PPE for federal employees.
- d. Review requests for hazardous materials purchases and procure non-hazardous materials when feasible and prudent.

### **3-3.1 The DOL Warehouse Camp Ripley Responsibilities are:**

- a. Provide containers upon request that meet DOT and UN Performance Optimum Packaging (POP) specifications for storage and transport of hazardous wastes.
- b. Provide labels, manifests and shipping papers to generators upon request.
- c. Provide MSD sheets for materials purchased by the federal supply system.
- d. Prepare DD Forms 1348-1 for the turn-in to DRMO.
- e. Determine the level of training required by DOL warehouse drivers who transport hazardous waste and scheduling the training.
- f. Assign DOL warehouse drivers to pickup wastes at VSQG facilities. Coordinate with VSQG facilities so the VSQG can deliver their wastes to the DOL warehouse.
- g. Schedule turn-in of VSQG hazardous or special/universal waste shipments with DRMO or other state contracted TSD facility within the 180 day requirement for VSQG waste.
- h. Ensure SQG waste is stored separate from waste collected under the VSQG Collection Program.
- i. Manage the SQG waste under the DOL Warehouse SQG transfer facility permit and all other applicable regulations.
- j. Manage VSQG waste under the DOL Warehouse VSQG Collection program permit and all other applicable regulations.
- k. Keep required records of all transactions.
- l. Ensure packaging and labeling requirements are adhered to for MNARNG waste transported from the DOL warehouse to DRMO or to contracted TSDF's.

### **3-4 THE 34<sup>th</sup> DIVISION**

The 34<sup>th</sup> Division Commander will:

- a. Ensure subordinate commanders appoint ECOs to manage hazardous waste activities during IDT, AT periods of training (drills).
- b. Ensure primary and alternate FECs are appointed for facilities the command manages.

#### **3-4.1 84<sup>th</sup> Troop Command**

The 84<sup>th</sup> Troop Command Commander will:

- a. Ensure subordinate commanders appoint ECOs to manage hazardous waste activities during IDT and AT periods of training (drills).
- b. Ensure primary and alternate FECs are appointed for facilities the command manages.

**3-5 STATE SAFETY AND OCCUPATIONAL HEALTH MANAGER (SOHM)**

The SOHM is responsible for the occupational health, industrial hygiene and safety of MNARNG active duty, federal technicians and M-day personnel. The SOHM implements the requirements of MNGR 385-10. (State employees are covered by the State Employee Safety and Health Officer, see section 3-2.3)

- a. Determining the clothing and protective gear required to safeguard employees while handling hazardous wastes in coordination with the MMO, SAO and the CRC.
- b. Advising the work supervisor to ensure that conditions, acts and practices does not degrade the personal safety of any employee.
- c. Assisting facility managers in obtaining material safety data sheets for chemicals used in their workplace.
- d. Program management for hazardous material use and storage as described by OSHA standards.

**3-6 STATE SURFACE MAINTENANCE OFFICE (SSMO)**

- a. Ensuring all SSMO maintenance facilities have a person tasked, by duty appointment (FEC), with the responsibility for on-site hazardous waste management. This person will also act as emergency coordinator for the facility unless otherwise noted by another duty appointment for emergency coordinator or alternate.
- b. Ensuring adequate availability of protective clothing in the shops and gear as required by the SOHM.
- c. Specifying and ordering supplies and equipment needed in each maintenance facility for hazardous waste management and spill response.
- d. Monitoring the work environment and management practices in the shops to ensure that personal safety is safeguarded and wastes are properly managed.
- e. Determining the hazardous waste training required by maintenance personnel and scheduling the training.

**3-7 STATE ARMY AVIATION OFFICER (SAAO)**

The SAAO will:

- a. Ensure all SAAO facilities have a person appointed as primary and alternate FEC.
- b. Coordinate proposed aviation programs, plans, and equipment fielding with FMO-E for integration of environmental requirements.

**3-8 CAMP RIPLEY AND ARDEN HILLS ARMY TRAINING COMMANDER (CRC-Z)**

The CRC-Z will:

- a. Appoint or perform the duties of an ECO for the Installation Support Unit.
- b. Appoint primary and alternate FEC positions for facilities the Command manages.
- c. Direct the generator to specify and order hazardous waste management and spill response supplies and equipment that are needed, at each training site generating waste and hazardous waste storage facility.

**3-9 OCUPATIONAL HEALTH NURSE (OHN)**

The OHN will:

- a. Ensure federal employees are monitored for health requirements of hazardous material handlers.
- b. Coordinate medical monitoring and medical surveillance.
- c. Conduct federal employee testing to ensure compatibility of the job to the employee.
- d. Incorporate OHN training requirements into hazardous waste management programs.
- e. Procure and fit test all safety equipment required for employees to perform their hazardous waste duties.
- f. Coordinate indoor air quality monitoring of MNARNG facilities with FMO-Safety.
- g. The OHN is responsible for the following Occupational Health and Industrial Hygiene programs, evaluations, and the maintenance of all these records:
  - Pre-placement and periodic physicals,
  - Respiratory protection,
  - Occupational vision,
  - Hearing conservation,
  - Pregnancy surveillance,
  - Radiation protection,
  - Record maintenance,
  - Evaluates jobs and work environments for PPC&E requirements,
  - Provides education on Occupational Health and IH programs,
  - Provides professional opinion on environmental differential pay EDP determinations,
  - Ensures right to know training is adequate, and
  - Evaluates hazards due to chemical, physical, biological and ergonomic stresses in the work environment.

### **3-10 UNIT/FACILITY COMMANDERS**

- a. Unit/Facility Commanders will designate, by duty appointment, a full-time employee (see FEC section 3-13) that will be tasked the responsibility for on-site hazardous waste management. This person will also act as emergency response coordinator for the facility unless otherwise noted by another duty appointment for emergency coordinator or alternate. (The term "facility" identifies operations such as OMS's and TACC's).

### **3-11 MNARNG GENERATORS OF HAZARDOUS WASTE**

Under the direction of the FEC or ECO, each shop/unit/organization generating hazardous waste is responsible to:

- a. Collect and segregate wastes, both hazardous and non-hazardous.
- b. Accumulate and package wastes in containers obtained from the DOL warehouse.
- c. Determine, record and monitor correct accumulation dates.
- d. Inspect containers weekly and keep a log of inspections.
- e. Label containers and prepare and sign shipping papers, DA Form 2765-1 or MNGR 200-3-0704. Maintain copies of shipping papers in the **Brown Tab 7 Plastic sleeve labeled-Shipping paper**.
- f. Indefinitely maintain copy three (returned from disposal facility) and copy eight (generator copy) of Minnesota Uniform Hazardous Waste Manifest for each hazardous waste shipment made from the facility (if used).
- g. Maintain a hazardous waste management plan and comply with it. (This document MNGR 200-3 is the referenced plan.)

- h. Submit required documents and information by specified dates as required by this regulation.
- i. Ensure employees have/use protective clothing and equipment for safe handling of wastes.
- j. Assign qualified drivers and vehicles to transport hazardous waste to DOL Warehouse, Camp Ripley, (see 3-17.1).

### **3-12 FACILITY OFFICER/NCO-IN-CHARGE**

The Facility Officer/NCO-in Charge will:

- a. Act as or appoint, a primary and alternate FEC for the facility. The FEC will be a fulltime employee of the MNARNG.
- b. Ensure compliance with all requirements of the FEC position.
- c. Report directly to the FMO-E and to Higher Headquarters within 24 hours any inspection of the facility by a regulatory agency.

### **3-13 FACILITY ENVIRONMENTAL COORDINATOR (FEC)**

- a. The commander of each facility that generates hazardous waste will designate a FEC and one alternate by duty appointment (see sample duty appointment Figure 3-1).
- b. The FEC or alternate will be familiar with the following:
  - (1) The facility layout and all aspects of the facilities contingency plan,
  - (2) All operations and activities at the facility,
  - (3) The location and characteristics of waste handled, and
  - (4) The location of all records within the facility.
- c. The FEC or alternate will coordinate emergency response measures and will be authorized to commit resources needed to carry out the contingency plan. The Installation On-Scene Coordinator in facilities that are tenants of Camp Ripley may relieve the FEC.
- d. Escort representatives of regulatory agencies and provide appropriate access to the facility to monitor compliance with applicable regulatory standards.
- e. Prepare and sign appropriate facility environmental forms and reports required by MNARNG regulation.
- f. The FEC will coordinate and implement environmental programs in accordance with MNGR 200-1, 200-2, 200-21 and as directed by FMO-E.

### **3-14 SHOP CHIEF/MAINTENANCE SUPERINTENDENT**

Shop Chiefs/Maintenance Superintendents will:

- a. Appoint a primary and alternate FEC. The FEC will be a fulltime MNARNG employee.
- b. Follow same requirements as the Facility Officer/NCO-In-Charge (see 3-12).

### **3-15 ENVIRONMENTAL COMPLIANCE OFFICER (ECO)**

- a. The commander of each unit will appoint a unit level NCO or Officer as an Environmental Compliance Officer (ECO) to coordinate and integrate environmental issues into the plans, orders, and training cycle of the unit, regardless of the location.
- b. The ECO will be familiar with the following:
  - (1) The facility contingency plans in their area of operations,
  - (2) All activities involving hazardous materials,
  - (3) The location and characteristics of hazardous waste handled, and
  - (4) The location of all records maintained by the unit during missions.

- c. The ECO will coordinate emergency response measures when away from the unit's facilities and will be authorized to commit resources needed to carry out contingency plans.
- d. Perform unit environmental self assessment and risk assessment.
- e. Conduct soldier environmental awareness training for the unit.
- f. Attend the ECO training within six months provided by STARC-Environmental.

**3-16 STATE AREA COMMAND ENVIRONMENTAL MANAGEMENT SECTION (STARC-Environmental) will:**

- a. Ensure commanders have an ECO on orders to help the unit coordinate and integrate environmental issues (including hazardous waste management) into their plans, orders, and training cycle, regardless of the location.
- b. Provide training to ECOs on general hazardous waste management and unit self-assessments as part of their required training, and provide additional support as needed to units that are deploying to other states or countries.
- c. Provide feedback to commanders on unit compliance based on assessments (self-assessments, spot checks, or organizational readiness evaluations). This will be done as part of the Minnesota Organizational Readiness Evaluation (MORE).
- d. Support FMO-E environmental requirements.

**3-17 DOL WAREHOUSE WASTE TRANSPORT DRIVERS**

Transport drivers will:

- a. Maintain all required driver certifications.
- b. Inspect shipments prior to loading to ensure use of proper containers, labels and shipping papers.
- c. Segregate incompatible wastes and materials within the transporting vehicle, as described in Chapter 7-4. Securing wastes in the vehicle.
- d. Transport wastes to the DOL Warehouse accompanied by appropriate shipping papers, DA Form 2765-1 or MNGR 200-3-0704.
- e. Transport wastes from the DOL warehouse directly to the DRMO or other state contracted TSD facility utilizing the proper shipping documents (manifests or shipping papers).
- f. Report, contain, and clean up releases of hazardous wastes in accordance with the Transportation Spill Response Plan.

**3-17.1 VSQG Facility Waste Transport Drivers**

- a. VSQG facilities will have the option to transport their wastes directly to the DOL warehouse, once they've received permission from the DOL warehouse to do so. See Chapter 7 for the DOL warehouse and VSQG transport driver requirements.
- b. All waste transport drivers will read and sign MNGR 200-3-0705, the VSQG Facility Driver Training form, see figure 7-5 in Chapter 7. Drivers will maintain a valid Minnesota drivers license.

**3-18 DEFENSE REUTILIZATION AND MARKETING OFFICE (DRMO)**

The DRMO will:

- a. Inspect and receive wastes from the transporter.
- b. Sign the Hazardous Waste Manifest and return Copy 3 of the manifest to generator.

- c. Store wastes in a permitted facility.
- d. Sell, recycle, treat, or dispose of wastes in compliance with all pertinent laws, regulations and rules; to minimize any MNARNG future liabilities.
- e. Keep records as required.

**3-19 US PROPERTY AND FISCAL OFFICER (USPF&O)**

The USPF&O will provide Federal purchasing and contracting support. For the management of hazardous waste.

<b>Figure 3-1</b> <b>SAMPLE DUTY APPOINTMENT</b>
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MEMORANDUM FOR

SUBJECT: Duty Appointment

1. Effective this date you are directed to assume the duties as a Facility Environmental Coordinator/Environmental Compliance Officer as specified by MNGR 200-3 (Army) Hazardous and Special Waste Management.
2. Period: Until officially relieved or released.
3. Purpose: Ensure all hazardous materials/wastes are managed in compliance with MNGR 200-3.
4. Special instructions: You will attend provided training and become familiar with MNGR 200-3 (Army) Hazardous and Special Waste Management and insure the following is completed:
  - a. Collecting and segregating wastes, both hazardous and non-hazardous.
  - b. Accumulating and packaging wastes in authorized containers.
  - c. Determining and monitoring correct accumulation dates.
  - d. Inspecting containers weekly and keeping a log of inspections.
  - e. Labeling containers properly.
  - f. Preparing and signing transportation manifests.
  - g. Preparing DD Form 2765-1 or MNGR 200-3-0704 for turn-in of wastes.
  - h. Indefinitely maintain copy three and copy eight for each hazardous waste shipment made of Minnesota Uniform Hazardous Waste Manifest.
  - i. Participating, maintaining and complying with a hazardous waste management plan..
  - j. Submitting required paperwork by specified dates as required by regulation.
  - k. Ensuring employees have/use protective clothing and equipment for safe handling of wastes.
  - l. When appropriate, assigning qualified drivers and vehicles to transport hazardous waste to DOL Warehouse, and or for transport to DRMO.
5. Special Instructions, Emergency Coordinator.
  - a. You will serve in the capacity of Emergency Coordinator and designate one alternate.
  - b. You will be familiar with all aspects of the facilities contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility and the facility layout.
  - c. You will coordinate emergency response measures and will be authorized to commit resources needed to carry out the contingency plan.
6. Training
  - a. Maintain the specified training documentation as required by MNGR 200-3 Chapter 9.
  - b. Perform training of all MNARNG staff performing hazardous waste responsibilities. This includes M-Day soldiers performing these activities.

## CHAPTER 4

### IDENTIFICATION, DISCLOSURE AND PROPER MANAGEMENT

#### 4-1 DEFINITION OF HAZARDOUS WASTE

- a. According to Minnesota Statutes Section 116.06, subdivision 11:  
"Hazardous waste" means any refuse, sludge, or other waste material or combinations of refuse, sludge or other waste materials in solid, semi-solid, liquid, or contained gaseous form which because of its quantity, concentration, or chemical, physical, or infectious characteristics may (a) cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed. Categories of hazardous materials that most often can be considered hazardous waste when the material cannot be used for its intended purpose include, but are not limited to: explosives, flammables, oxidizers, poisons, irritants, and corrosives. Hazardous waste does not include source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended. Minnesota Rules 7045.0129 that states the criteria for listing hazardous waste, Minnesota Rules 7045.0131 that states the characteristics of hazardous waste, and Minnesota Rules 7045.0135 that lists specific hazardous wastes also define hazardous waste.
- b. A waste may be hazardous because it exhibits one of the following characteristics that makes it hazardous (Ignitable (I), Corrosive (C), Reactive (R), Toxicity Characteristic Leaching Procedure (TCLP). The MPCA lists lethality (MN 01) as a waste characteristic.
- c. A waste may be specifically listed as a hazardous waste because of its toxicity (T).
- d. A waste may also be listed as acute hazardous waste (H). These wastes require more stringent management.
- e. Use Figure 4-1 to determine if a waste is hazardous or a special waste. The Material Safety Data Sheet (MSDS) for the new wastes should provide necessary information to answer questions. If in doubt, contact the FMO-E.
- f. Figure 4-2 lists examples of other waste materials that are not hazardous wastes, but require special handling for disposal.
- g. Specific lists of hazardous wastes are available from the FMO-E.

#### 4-2 HAZARDOUS WASTE ANALYSIS

- a. When a material can no longer be used, either by the user or within the Minnesota Army National Guard for its intended purposes, it becomes a waste.
- b. The user will determine if a waste is hazardous by using Figures 4-1 and 4-2. If **positive** determination is not possible, contact the FMO-E.
- c. Waste evaluation may require a laboratory analysis. After the generator has notified FMO-E of a new or questionable waste (see Section 4-4), FMO-E will coordinate with FMO Materials Management for testing. FMO-E will interpret the analysis.

- d. FMO-E will provide generator disposal guidance. This guidance will most often be for the generator to contact the DOL Warehouse and coordinate waste disposal through the VSQG collection program at the DOL Warehouse.

#### 4-3 WASTE MANAGEMENT

- a. If a waste is determined to be a hazardous or a special waste (see Figure 4-1 and 4-2), follow the requirements of this regulation for management of the waste.
- b. If the waste is not hazardous dispose of the waste according to other applicable Minnesota Army National Guard solid waste regulations.

#### 4-4 DISCLOSURE OF HAZARDOUS MATERIALS AND WASTES

- a. Each Minnesota Army National Guard facility which uses a hazardous material will complete and submit a Hazardous Substance Inventory (Form MNGR 200-3-1101) to FMO-E as instructed in Chapter 11 of this regulation.
- b. Each MNARNG facility, which produces a new hazardous waste or changes waste management procedures, will complete and submit a Hazardous Waste Record (Form MNGR 200-3-0803) to the FMO-E. The new waste will not be treated, disposed of, or change possession until authorized by FMO-E (See Chapter 11, Record Keeping and Reports). The FMO-E will have 75 days, from the date the new waste was generated, to notify the Minnesota Pollution Control Agency (MPCA) of the change (Mn Rules 7045.0243). This will be done by submitting an amended license application to the MPCA. At no time during this period may the waste be treated, disposed of or the control of the waste relinquished. The waste will remain at the facility until the FMO-E notifies the generator that it may be disposed of.
- c. All hazardous waste profiles, test results and MSDS's for the waste generated at your facility will be maintained in **Brown Tab 8** of your facilities MNGR 200-3.
- d. FMO-E requires the information on the completed, above-specified forms to assist them in completing the disclosure process to regulatory agencies. FMO-E submits disclosures to regulators for all MNARNG generators.
  - (1) In the seven county metro area, disclosures are provided to County Hazardous Waste Staff.
  - (2) For greater Minnesota, disclosures are provided to MPCA.
- d. MNARNG generators are required to complete the following forms and submit to them to the FMO-E for the preceding calendar year by **1 January of each year**.
  - (1) Completed Hazardous Waste Record (Form MNGR 200-3-0803) for the following types of waste:
    - (a) All hazardous waste generated and shipped from the facility, as well as any changes in types of waste generated or amounts generated.
    - (b) One-time waste shipments of hazardous waste that have not been generated before and will not be generated again. This form must note that this is a one-time shipment of this waste. Examples of this may include cleaning out a warehouse, products no longer fit for use, etc.
    - (c) A copy of the Hazardous Waste Record is kept in the facility hazardous waste compliance records.

- (d) The appointed FEC must sign the Hazardous Waste Record.
- (2) Wastes Requiring Special Handling (Form MNGR 200-3-0804):
  - (a) Many waste streams generated by MNARNG facilities require special handling. These waste streams are often described as non-regulatory, non-hazardous or special waste streams.
  - (b) These waste streams may include:
    - Used oil filters, anti-freeze, batteries, silica sand, wash rack drain trap sludge, spent fuel filters, etc.
  - (c) Any change in types of special wastes generated or amounts generated must be reflected on this report form.
  - (d) Contact FMO-E for assistance in completion of this form if any questions exist on the type of wastes requiring reporting on this form.

#### **4-5 GENERATOR STATUS**

- a. The rules under which a generator stores and disposes of hazardous wastes are determined by the type and quantity generated per month. See Chapter 2-5 and 6-3 of this regulation for hazardous waste accumulation limits and storage times.
- b. Only Minnesota Army National Guard facilities classified Very Small Quantity Generators (VSQG) are authorized to utilize this regulation. All TACC facilities and all OMS facilities except New Brighton are VSQG's. Small Quantity Generators (SQG) must use the MNGR 200-3 that is dedicated to SQG's. Figure 4-4 lists all VSQG and SQG facilities separately.

#### **4-6 GENERATOR IDENTIFICATION NUMBER**

All MNARNG facilities will have an Environmental Protection Agency (EPA) Identification Number. FMO-E will apply for the number for each new facility. The ID numbers are listed in Figure 4-4. The ID number will be used on hazardous waste manifests and reports to regulatory agencies. Adjacent facilities may use the same EPA ID number as long as they are located within the same block in town or on the same lot, as in an industrial park.

#### **4-7 RELINQUISHING CONTROL**

Generators will make arrangements with the DOL Warehouse to relinquish control of the hazardous waste. Once the DOL Warehouse has given approval to receive the waste, the generator may transport the waste directly or schedule to have the Warehouse or a state contracted transporter pick-up the waste. If disposal of the waste requires the use of a non-contracted transporter, the MNARNG facility must first contact the FMO-E to get approval to use the contractor.

#### **4-8 DUTY TO REPORT AND RECOVER SPILLS**

Any person in control of a hazardous waste that spills, leaks or otherwise escapes from a container shall immediately implement the requirements of MNGR 200-21, the Installation Spill Contingency Plan (ISCP) or Facility Spill Contingency Plan. This regulation details proper notification, spill control, emergency and recovery procedures.

**Figure 4-1**  
**HOW TO DETERMINE IF A WASTE IS HAZARDOUS**

- a. Is the waste exempt from regulation? Examples of exempted wastes include:
- Household refuse and sewage.
  - Non-household rubbish (unusable paper and cardboard, wood and plastic scrap) and demolition debris.
  - Used oil that is recycled (must not contain listed hazardous waste and will be included in the MNARNG hazardous waste disclosure or license) (see special handling wastes).
  - Scrap metal that is recycled.
  - NPDES-permitted waste discharged to surface waters.
  - Certain wastes containing trivalent chromium if they do not contain hexavalent chromium.
  - Empty containers and empty liners are also exempt from regulation if they meet the definition of empty in Chapter 5 Containers.

**SPECIAL WASTES**, Special wastes are exempt from hazardous waste regulations, except for transportation requirements. These wastes and include:

- Non-automotive batteries such as alkaline, spent lithium, magnesium, mercury, NiCd and sealed lead acid used for emergency lighting.
- Antifreeze bound for recycling.
- PCB fluorescent light ballasts.
- Fluorescent bulbs.

**NOTE:** This is not a complete listing of exempted wastes.  
Contact the FMO-E for further information.

- b. Is the waste listed as a hazardous waste? Listed wastes include:
- Many "spent" chlorinated cleaners and degreasers including carbon tetrachloride, freon, dischlorobenzene, methylene chloride, perchloroethylene or "perc", trichloroethane, and trichloroethylene.
  - Many other waste cleaners and strippers including acetone, butyl alcohol, carbon disulfide, cresol, ethyl acetate, methyl ethyl ketone ("MEK"), methyl isobutyl ketone ("MIBK"), methyl (wood) alcohol, toluene, and xylene.
  - Residues from stills (or any other system) used to recover these solvents.
  - Certain wastes from the heat treatment of metals.
  - Wastes produced during specific manufacturing processes (the manufacture of certain chemicals, inks or pigments) many commercial products that are no longer usable because they are dated or "off-spec".

**NOTE:** These are only some of the hazardous wastes that are listed. Please see the Minnesota Rules pt. 7045.0135 for the complete listing, or request additional information from FMO-E.

- c. Does the waste contain PCB's?  
Wastes containing more than 50 parts per million (ppm) of PCB's are regulated as hazardous waste in Minnesota.
- d. Is the waste hazardous because it exhibits a hazardous characteristic?  
Ignitability. A liquid waste is "ignitable" if it has a flash point less than 60 degrees Celsius or 140

degrees Fahrenheit (F) (See your MSDS or lab data). Many solvents are ignitable. A solid waste is ignitable if it can spontaneously catch fire and burn so persistently that it represents a hazard. (Minnesota Rules pt. 7045.0131, subp. 2.). A waste that exhibits the characteristic of ignitability has the hazardous waste number of D001.

Oxidizers. An oxidizer adds oxygen to a reaction or fire. Wastes having this characteristic often have major components whose chemical names contain the prefix "per-" or the suffixes "-oxide" or "-ate". Many wastes containing nitrogen or halogens (fluorine, chlorine, bromine, or iodine) are also oxidizers. (Minnesota Rules pt. 7045.0131, subp. 3). A waste that exhibits characteristics of an oxidizer has the hazardous waste number of D001.

Corrosivity (acids or bases). Any aqueous (water-based) waste having a "pH" (the unit used to describe the strength of an acid or a caustic) of less than or equal to 2.0 or equal to or more than 12.5 is corrosive (see your MSDS or lab data). A liquid able to corrode steel at a rate of 1/4 inch per year is also corrosive. (Mn Rules 7045.0131, subp. 4). A waste that exhibits the characteristics of corrosivity has the hazardous waste number of D002.

Reactivity. Unstable or explosive wastes, wastes that react violently when brought in contact with water, and wastes that can release toxic vapors such as hydrogen cyanide or hydrogen sulfide, are considered reactive. (Minnesota Rules pt. 7045.0131, subp.5). A waste that exhibits the characteristics of reactivity has the hazardous waste number of D003.

Lethality. If either a waste or its components have been found to be toxic through previous animal tests, the waste is hazardous. (Minnesota Rules pt. 7045.0131, subp. 6). A waste that exhibits the characteristics of lethality has the hazardous waste number of MN01.

Toxicity. A waste that releases certain amounts of toxic metals (for example: arsenic, cadmium, chromium, lead or mercury) in a specific laboratory "extraction procedure" is called toxic and is hazardous. (Minnesota Rules pt. 7045.0131, subp. 7). The table below lists the toxicity levels. If the concentration of metal listed in lab results is greater than the maximum concentration allowed in Table 4-1, the waste is hazardous.

**TABLE 4-1**  
**MAXIMUM CONCENTRATION FOR THE TOXICITY CHARACTERISTIC**

<b>Hazardous Waste Number</b>	<b>Contaminant</b>	<b>Maximum Concentration (milligrams per liter) parts per million (ppm)</b>
D004	Arsenic	5.0
D005	Barium	100.0
D018	Benzene	0.5
D006	Cadmium	1.0
D019	Carbon Tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Cresol	200.0
D016	2,4-D	10.0
D027	1,4-Dichlorobenzene	7.5
D028	1,2-Dichloroethane	0.5
D029	1,1-Dichloroethylene	0.7
D030	2,4-Dinitrotoluene	0.13
D012	Endrine	0.02
D031	Heptachlor (and its epoxide)	0.008
D032	Hexachlorobenzene	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D035	Methyl Ethyl Ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium	1.0
D011	Silver	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0

D017	2,4,5-TP (Silvex)	1.0
D043	Vinyl Chloride	0.2

**FIGURE 4-2**  
**OTHER WASTE MATERIALS THAT REQUIRE SPECIAL HANDLING**

**USED OIL** (including lubricating oils, hydraulic fluids, calibration oils, other petroleum based products)

**DIELECTRIC FLUIDS** (from transformers, capacitors, ballasts)

**ASBESTOS** (from brake lining vacuum cleaners, building maintenance activities)

**FUELS** (including diesel fuel, kerosene)

**SUMP SLUDGE FROM OIL WATER SEPARATORS**

**SILICA SAND** (generated from paint removal)

**TREATED WOOD PRODUCTS**

**APPLIANCES** (containing ozone depleting substances)

**FLOOR DRY** (as well as other absorbents)

**CONTAMINATED SOILS**

**FIGURE 4 - 4**  
**E.P.A. I.D. NUMBERS BY VSQG FACILITY**

<u><b>NAME</b></u>	<u><b>E.P.A. I.D. NUMBER</b></u>
M.V.S.B., Olivia	MND 980 682 298
M.V.S.B., St. James	MND 980 682 280
National Guard TACC, Albert Lea	MND 985 705 821
National Guard TACC, Alexandria	MND 980 682 033
National Guard TACC, Anoka	MND 980 682 041
National Guard TACC, Appleton	MND 980 682 058
National Guard TACC, Austin	MND 980 682 074
National Guard TACC, Bemidji	MND 980 682 082
National Guard TACC, Bloomington	MND 981 093 594
National Guard TACC, Brainerd	MND 985 706 134
National Guard TACC, Brooklyn Park	MND 985 740 125
National Guard TACC, Cambridge	MNR 000 100 974
National Guard TACC, Chisholm	MND 980 682 116
National Guard TACC, Cloquet	MND 980 682 124
National Guard TACC, Cottage Grove	MND 981 093 602
National Guard TACC, Crookston	MND 980 682 132
National Guard TACC, Detroit Lakes	MND 980 681 928
National Guard TACC, Duluth	MND 980 681 936
National Guard TACC, Eagan	MND 000 073 478
National Guard TACC, Fairmont	MND 980 681 951
National Guard TACC, Faribault	MND 980 681 969
National Guard TACC, Fergus Falls	MND 980 681 977
National Guard TACC, Grand Rapids	MND 980 681 985
National Guard TACC, Hastings	MND 980 681 993
National Guard TACC, Hibbing	MND 980 682 009
National Guard TACC, Hutchinson	MND 980 682 587
National Guard TACC, Jackson	MND 980 682 595
National Guard TACC, Litchfield	MND 980 682 603
National Guard TACC, Long Prairie	MNR 000 101 923
National Guard TACC, Luverne	MND 980 682 538
National Guard TACC, Madison	MND 980 682 629
National Guard TACC, Mankato	MND 980 682 637
National Guard TACC, Marshall	MND 980 682 652
National Guard TACC, Minneapolis, North East	MND 980 682 660
National Guard TACC, Montevideo	MND 980 682 686
National Guard TACC, Moorhead	MND 985 706 100

**FIGURE 4 - 4**  
**E.P.A. I.D. NUMBERS BY VSQG FACILITY - continued**

<u>NAME</u>	<u>E.P.A. I.D. NUMBER</u>
National Guard TACC, Morris	MND 980 681 902
National Guard TACC, New Ulm	MND 980 682 363
National Guard TACC, Northfield	MND 980 682 355
National Guard TACC, Olivia	MND 980 682 348
National Guard TACC, Ortonville	MND 985 706 118
National Guard TACC, Owatonna	MND 980 682 462
National Guard TACC, Pine City	MND 980 682 488
National Guard TACC, Pipestone	MND 980 682 496
National Guard TACC, Princeton	MND 980 682 504
National Guard TACC, Red Wing	MND 980 682 512
National Guard TACC, Redwood Falls	MND 980 682 520
National Guard TACC, Rochester	MND 980 682 546
National Guard TACC, Rosemount	MND 000 915 810
National Guard TACC, Roseville	MND 980 682 553
National Guard TACC, St. Cloud	MND 980 682 561
National Guard TACC, St. James	MND 980 682 579
National Guard TACC, St. Paul	MND 980 682 215
National Guard TACC, St. Paul East	MND 980 682 223
National Guard TACC, St. Paul West	MND 980 682 249
National Guard TACC, St. Peter	MND 980 682 231
National Guard TACC, Sauk Centre	MND 980 682 256
National Guard TACC, Stillwater	MND 980 682 264
National Guard TACC, Thief River Falls	MND 980 682 272
National Guard TACC, Wadena	MND 980 682 421
National Guard TACC, Willmar	MND 980 682 413
National Guard TACC, Winona	MND 980 682 397
OMS #7, Appleton	MND 980 682 066
OMS #2S, Austin	MND 980 682 074
OMS #13S, Cloquet	MND 985 706 175
OMS #5, Detroit Lakes	MND 985 706 183
OMS #13, Hibbing	MND 980 682 009
OMS #6, New Ulm	MND 985 722 164
OMS #2, Rochester	MND 985 706 241
OMS #1, Rosemount	MND 000 016 634
OMS #4, Willmar	MND 985 706 092
OMS #14, Camp Ripley	MND 985 706 225
Regional Training Site - Maintenance (RTS-M)	MND 985 706 233

**THESE ARE ALL THE MNARNG VSQG'S.**  
**THE NEXT PAGE LISTS MNARNG SQG'S**

**FIGURE 4 - 4**

**E.P.A. I.D. NUMBERS BY SQG FACILITY**

**NOTE: The following MNARNG facilities are SQG's and must abide by the MNGR 200-3 for SQG facilities. Their EPA ID #'s are provided for reference only.**

**NAME**

**E.P.A. I.D. NUMBER**

AASF/Armory, St. Paul Downtown Airport  
OMS # 8, New Brighton

MND 980 682 207  
MND 980 682 694

**CAMP RIPLEY FACILITIES**

Combined Support Maintenance Shop (CSMS)  
Mobilization and Training Equipment Site (MATES)  
Camp Ripley Training Site

MND 985 706 191  
MND 985 706 209  
MND 980 681 894

**TRANSPORTER/DISPOSAL FACILITY**

DOL  
DRMO - Duluth  
OSI Environmental  
Barton Enterprises  
Recyclights

MND 985 706 217  
MND 000 773 341  
MND 141 236 687  
MND 020 479 077  
MND 985 746 569

**CHAPTER 5****CONTAINERS****5-1 GENERAL**

- a. Hazardous wastes will be stored and transported in Department of Transportation (DOT) approved containers (49 CFR 173-178).
- b. The original container, to the extent possible, will be used to store and transport waste material. All containers, original and replacement, must meet the UN Performance Optimum Packaging (POP) requirements for transportation of waste material and provide reference for DOT shipping name and labeling requirements.
- c. Empty clean containers can be stored in the waste storage area, but must be separated from drums being filled or full of waste.
- d. Empty drums will be stored on their side if drums are stored outdoors.
- e. Containers will be properly marked and labeled (see section 5-7).

**5-2 CONTAINER TYPE AND REQUEST**

- a. If original shipping container will not be used to store a hazardous waste, determine the type of container required from Figure 5-1, Table 8-1 or call the Materials Identifier and Classifier at the DOL Warehouse at DSN # 871-7488 or 320-632-7488.
- b. Request container(s) from DOL Warehouse with Request for Issue (DA Form 2765-1).
- c. All containers must meet POP requirements and be made of, or lined with, materials that will not react with the waste to be stored in the container.

**5-3 CONTAINER CONDITION**

- a. All containers used for accumulation and shipping of hazardous wastes must be in good condition and able to withstand handling, transport, and long term storage without leaking. Containers must not be creased, rusted or seriously dented.
- b. Closure devices (bungs, lids etc.) must be secure, compatible with the container, and compatible with the waste. These devices must prevent the container from leaking.
- c. Old markings and labels on containers must be removed or painted over to avoid confusion about the contents.

**5-4 FILLING CONTAINERS**

- a. Wastes deposited in containers must be compatible with the container and must be compatible with the container. Do not mix wastes without direction from FMO-E. Examples of wastes that are placed together in same container are:
  - (1) Used oils and hydraulic fluids (not synthetic fluids).
  - (2) Synthetic oils, brake and hydraulic fluids.
  - (3) Paints and thinners.
  - (4) Batteries (separate by type)(alkaline/lithium/Ni-Cd/magnesium).
- b. A log (Figure 5-2, Form MNGR 200-3-0502) of all wastes put into a container will be maintained for each container. The log will be attached to annual turn-in documents, and a copy

turned in with the shipping paper used (MNGR 200-3-0704 or DA Form 2765-1). Place copies of the MNGR 200-3-0502 in the Brown Tab 11 plastic sleeve labeled-Hazardous Waste Log. Logs generally aren't required for waste streams such as batteries.

- c. When filling drums, sufficient outage (headspace) will be provided to allow for expansion. As a guide:

<u>Size of Container</u>	<u>Amount of Headspace</u>
55 gallon	4 inches
30 gallon	3 inches
15 gallon	2 inches
less than 15 gallon	1 inch

- d. When filling containers an accumulation label will be affixed stating contents of the container and the date accumulation began. Labels are available through the DOL Warehouse (see section 5-7).
- e. Keep containers closed between fillings. Replace the bung or cover when the container is no longer being filled.

## 5-5 EMPTY CONTAINERS

- a. Containers that held non-hazardous waste are exempt from waste rules. Once containers are empty, manage containers as scrap metal.
- b. Definition of RCRA "Empty". This first definition does not apply to containers that held acute hazardous waste or compressed gases:
- (1) A container (or an inner liner removed from a container) that has held hazardous material is considered empty if all the removable wastes have been removed from the container by using common practices AND one of the following three conditions have been met:
    - No more than one inch of residue remains on the bottom.
    - No more than 3.0 percent (by weight) waste remains inside a container having a total capacity of 110 gallons or less.
    - No more than 0.3 percent (by weight) waste remains inside a container having a total capacity of more than 110 gallons.
  - (2) If a container or liner has held an acutely hazardous waste, it is empty only if it has met one of the following three conditions:
    - The container and liner has been triple rinsed using an appropriate solvent, most often water. Contact the DOL Warehouse (see 5-2.a) or FMO-E for up-to-date guidance.
    - The inner liner, if present, has been removed and managed as hazardous waste.
  - (3) Only after meeting the above-mentioned parameters of a "RCRA empty container" may steel containers go out as scrap metal for recycling or as trash.
- c. Empty compressed gas containers are exempt from the hazardous waste rules when there is no pressure left in the cylinder. Manage as scrap metal, or return to supplier for refilling.

- d. All storage containers (55 gallon drums and 5 gallon containers) meeting the definition of RCRA empty described above, not required for the collection of used oils, solvents, etc., should be turned into DOL Warehouse as scrap steel.

#### **5-6 OVERPACK/SALVAGE DRUMS**

- a. An open-head overpack/salvage drum must be used as an outer container for a damaged or rusted container(s) of hazardous waste, if the waste cannot be safely transferred to a new container.
- b. Place a granular absorbent in the bottom of the overpack drum before placing the damaged container inside. Fill in all empty space around the damaged container with a granular absorbent (i.e. "Floor Dry", "Safe Step"). The absorbent material serves to cushion the inner container(s) and will absorb liquid that may leak out of the damaged container(s). Absorbent material is to be firmly packed into the salvage drum.
- c. The overpack drum must be securely closed when filled. It may not be used to accumulate additional wastes.
- d. In addition to the labeling and marking requirements described in Section 5-7, the overpack/salvage drum must be marked as follows:
  - (1) "OVERPACK DRUM" or "SALVAGE DRUM"
  - (2) "THIS END UP"
- e. The DA Form 2765-1 or MNGR 200-3-0704 must indicate the number and size of containers in the salvage drum.

#### **5-7 CONTAINER MARKING AND LABELING**

- a. All hazardous waste containers will be labeled with the date when the container became full. This will then become the "Accumulation Start Date", and the facility will then be required to comply with disposal dates set forth in Chapter 6-3.
- b. Mark the top of the container with the Proper Shipping Name and the Emergency Response Guide number found in Table 8-1. This information must be permanent and clearly legible.
- c. Hazardous Waste labels are required to be placed on the container. Place the label away from the bung. Figure 5-3 demonstrates proper completion of a label. Use permanent marking pen compatible with vinyl surfaces. Contact the DOL Warehouse or use the information in Table 8-1 to complete the Hazardous Waste label (see Figure 5-3).
- d. Hazard Labels. Hazard labels are the small 4x4 inch labels of DOT hazard categories, such as FLAMMABLE, CORROSIVE or OXIDIZER. Contact the DOL Warehouse or use the information in Table 8-1 on which label to use.
- e. Hazardous Waste Labels and Hazard Labels are available from the Materials Examiner and Identifier at DSN #871-7488 or (320) 632-7488.

<b>Figure 5-1</b> <b>CONTAINER DETERMINATION</b>
---

The following are common hazardous wastes generated by Minnesota Army National Guard and the corresponding authorized containers for accumulation and shipment. (Note: Only those authorized containers that appear to be practical for Minnesota Army National Guard use are listed, these containers meet the UN's Performance Optimum Packaging (POP) requirements). Use of other containers must be approved by DOL Warehouse or FMO-E prior to shipping any wastes. Contact the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN # 871-7488.

**CATEGORY OF WASTE****CONTAINERS AUTHORIZED \***

(1) Alkaline Corrosive  
Liquids (ex. caustic soda  
degreasers, boiler chemicals)

- (a) Metal Drum Specification-  
5A, 5B, 5C & 5M
- (b) Metal Drum Specification-  
17E (single trip container with  
tight head. Can be re-used 1  
time with out testing for leaks.)  
\*\*(Note 17C, F or H cannot be  
used to ship this corrosive  
liquid unless openings do not  
exceed 2.3")
- (c) Steel Drum with Polyethylene  
Liner - Specification 37P  
(non-re-usable container. May  
be re-used 1 time for this  
hazardous waste.)
- (d) Polyethylene Container-  
Specification 34 (cannot be  
over 30 gallon capacity.

(2) Combustible Liquid  
(Flash Point less than 200°  
but more than 140°F (ex. mineral  
spirits solvent, cleaning compounds

Specification packaging not  
required in most cases unless  
greater than 110 gal/container

preventative coating

**CATEGORY OF WASTE**

(3) Flammable Liquids (Flash Point less than 140°F)(ex. alcoxylene, methyl, ethyl, ketone, turpentine, toluene, naptha, JP4, fuel, paint, thinners)

(4) Flammable Paints and Paint Related Materials (ex. thinners, lacquers, varnishes)

**CONTAINERS AUTHORIZED \***

- (a) Metal Drums-Specification 5, 5A, 5B, 5C and 5M (55 gal. hols, capacity)(openings must be less than 2.3" diameter)
- (b) Metal Drums-Specification 17E (tight head drum single trip container may be re-used 1 time without retesting) 5 30 gal. capacity 19 guage. Over 30 gal capacity 18 guage.
- (c) Metal Drum - Specification 17C only if flash point is above 20°F. (Open head drum single trip container may be re-used once without retesting) 55 gal. capacity
- (d) Wooden Box Specification- 15A, 15B, 15C, 16A, 19A, or 19B with inside metal pails or cans not over 10 gal. each.
- (e) Fiberboard Box - Specification 12A or 12B with inside metal containers not over 1 gal. capacity each. No more than 6 per box, no more than 45 lbs. gross weight.
- (a) As for Flammable Liquids
- (b) Metal Drum Specification- paint removers, stains, wood 37A or 37B (Single trip fillers) container may be re-used one time for waste paints without retesting). These cannot exceed 5

gal. capacity.

**CATEGORY OF WASTE**

**CONTAINERS AUTHORIZED \***

(5) Battery Acid (less than strength)  
Hydrochloric Acid (less than 42% strength)

(a) Polyethylene Container - 42% Specification 34-15 or 34-30

(b) Other packaging involves smaller containers and various types of overpacking.

(6) Chlorinated Solvents (ex. Trichloroethylene & 1, 1, 1, Trichloroethane) or ORM-E Hazardous Wastes (ex. waste fire resistant hydraulic fluid)

Specification packaging not required but drums must meet certain performance standards. Should re-use drum in which material was initially shipped.

\*\* DOT Specifications are printed/embossed/engraved on the bottom or sides of drums and boxes.



**Figure 5-3**  
**INSTRUCTIONS FOR COMPLETING HAZARDOUS WASTE LABELS**

1. Enter facility name, facility address and phone number.
2. Enter facility EPA/State Generator Identification Number (i.e. MND \_\_\_\_\_)
3. Enter the manifest document number after the manifest has been prepared.  
Not required if waste is being sent to the DOL under the VSQG Collection Program.
4. Enter the date the accumulation started. On satellite storage containers, enter date container is filled.
5. List four-digit EPA Waste ID number specific to waste (from Table 8-1).
6. Enter the proper DOT proper shipping name and Emergency Response Guide from Table 8-1.

**SAMPLE OF COMPLETED HAZARDOUS WASTE**

Information for Antifreeze sludge shipped from OMS #13 is listed below as an example on a sample label. Request waste labels from the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN #871-7488.

<b>SAMPLE LABEL</b>	<b>SAMPLE LABEL</b>
<b>HAZARDOUS WASTE</b>	
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.	
GENERATOR INFORMATION:	
NAME <u>OMS #13 Hibbing</u>	
ADDRESS <u>2312 Brooklyn Drive</u>	PHONE <u>(218) 262-6758</u>
CITY <u>Hibbing</u>	STATE <u>MN</u> ZIP <u>55746-1955</u>
/ Manifest Document No. Isn't	
EPA / MANIFEST	/ required for wastes
ID NO./ DOCUMENT NO. <u>MND980682009</u>	/ hauled from VSQG's to DOL
ACCUMULATION	EPA
START DATE <u>January 1, 2001</u>	WASTE NO. <u>D006, D008</u>
<u>Antifreeze sludge from recycling process</u>	
<u>Hazardous waste, liquid, N.O.S. (Lead, Cadmium),</u>	
<u>9, NA 3082, PG III, ERG #171</u>	
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX	
<b>HANDLE WITH CARE!</b>	
<b>THIS IS A SAMPLE LABEL. USE AS AN EXAMPLE ONLY!</b>	

FIGURE 5-3  
5-8

**CHAPTER 6****ACCUMULATION AND STORAGE****6-1 GENERAL STORAGE REQUIREMENTS**

- a. Containers holding hazardous waste must have funnels removed and the bung or lid closed during storage, except to add or remove waste.
- b. Aisle space must be maintained within the hazardous waste storage area to provide unobstructed movement of personnel and fire and spill control equipment in an emergency. Generally, a four-foot aisle is required.
- c. All containers identifying markings and labels must be visible to any authorized individual entering the area. Unauthorized entry into the storage area is prohibited.
- d. Containers in a hazardous waste storage area must be inspected weekly for possible leaks or deterioration with results recorded on an inspection log (see Figure 6-1, Weekly Storage Inspection Log (Form MNGR 200-3-0601)).
- e. Incompatible hazardous wastes (i.e. a strong acid and an organic solvent) must be separated by a dike, berm or wall within the main storage area in accordance with compatibility guidelines in Chapter 7-4 and listed in Figure 7-1.
- f. Waste containers storing liquids are to be stored on a covered, curbed and impermeable surface. This structure must also limit access only to authorized individuals.
- g. Metal containers that are stored in the hazardous waste storage area that contain flammable waste are required to be grounded.
- h. Containers that hold batteries will be corrosion preventive, closed at all times (other than filling) and vented to prevent build up of flammable gases (i.e. corrosive resistant hazardous waste container with loosened cover or unsnapped ring should allow for adequate venting).

**6-2 SPECIFIC OUTDOOR STORAGE REQUIREMENTS**

- a. A hazardous waste outdoor storage area must be protected from unauthorized access and inadvertent damage from vehicles or equipment.
- b. Containers in the outdoor storage area that hold free liquids must be placed on a containment surface that is impermeable to the waste stored and curbed to contain the amount of material stored in the largest container stored. (If you have any questions regarding the appropriate surface, contact FMO-E.)
- c. Containers holding hazardous wastes which exhibit the characteristics of ignitability (a flash point below 140°F) or which exhibit the potential for creating vapor pressure capable of causing containers to leak, deform or otherwise fail will require shading from direct sunlight.

**6-3 WASTE ACCUMULATION QUANTITIES AND TIME LIMITS**

- a. Very Small Quantity Generators may produce between 0 and 100 kilograms of hazardous waste per calendar month. One hundred kilograms is approximately 220 gallons or 2,200 pounds. VSQG's may store up to 100 kg or 220 gallons or 2200 pounds (approximately four barrels) of hazardous waste that is not considered acute hazardous waste at any one time.
- b. **However, as stated in the Chapter 2 (Policies) Section 2-5, "It is the MNARNG's policy to immediately dispose of full containers." This is true even though VSQG's are allowed to store up to four full containers and have 180 days to dispose of these containers.**

**6-4 SATELLITE ACCUMULATION**

- a. Definition. A generator may accumulate as much as 55 gallons of hazardous waste at or near the point of generation of the waste. This waste must be under the control of the operator of the process that is generating the waste.
- b. Satellite accumulation provisions allow MNARNG facilities that have slowly accumulating hazardous waste, to accumulate waste for long periods of time. This provision allows for shipments of full containers. However, the VSQG's will also have the option to haul small amounts of waste to the DOL Warehouse for satellite accumulation at the DOL Warehouse. Waste such as alkaline batteries fall into this category.
- c. Quantity Limit. A maximum accumulation of 55 gallons of non-acutely toxic hazardous waste is permitted. However, more than one waste stream can be satellite accumulated at one time. Different types of batteries such as alkaline and lithium may be satellite accumulated in the same area. Once satellite accumulation drums are full they must be transferred to drum storage area within three (3) days.
- d. Marking and Labeling. Containers in a satellite location will be marked with the words "Hazardous Waste" and a description that clearly identifies its contents to employees and emergency personnel. Additional information required on the hazardous waste storage container are the words "Satellite Accumulation Storage".
  - Satellite Accumulation Start Date: The first date that waste is placed in the container.
  - Fill Date: The date that the waste container becomes filled to capacity.
  - Move Date: Date that container is moved to its proper storage location. This must occur within three (3) days of the fill date.
- e. This "fill date" signifies the start of the 180-day storage time limit for disposal (See 6-3.b).
- f. Information required may also be placed on the container by stencil, paint or indelible marker, and must be readily visible for inspection.
- g. Hazardous waste labels are available from the DOL Warehouse.

**6-5 WASTE HANDLING EQUIPMENT**

All VSQG facilities that generate hazardous waste will purchase and maintain on-site safety and spill containment materials. The table below (6-1) was generated from information obtained from MNARNG Spill and Contingency Plan (MNGR 200-21, Tables 4-1 and 4-2). This information is provided as a reference, generators must review MNGR 200-21 to ensure that all information is current. Spill Kits will contain, at a minimum, the items listed below:

**TABLE 6-1**

<u>Facility</u>	<u>Item</u>	<u>Quantity</u>	<u>Model #</u>	<u>NSN</u>	<u>Supplier</u>
<b>TACC's</b>	Unit Spill Kit GP	1	MA-600	7930-00-269-1272	Mn Absorption Corp.
	Floor Dry	50 lbs			
	Drain Cover (Not for Trench Drains)	1/drain	Rubber		
<b>OMS's</b>	Shop Spill Kit	1	MA-800	7930-00-269-1272	Mn Absorption Corp.
	Floor Dry	100 lbs			
	Drain Cover (Not for Trench Drains)	1/drain	Rubber		

**6-6 INSPECTION OF HAZARDOUS WASTE STORAGE AREAS**

Inspection of hazardous waste storage areas must be accomplished on a weekly basis when wastes are being stored. These inspections must be documented. Figure 6-1, Weekly Storage Inspection Log (Form MNGR 200-3-0601), has been provided. When performing these inspections you must document any deficiencies you note and how they were corrected such as assuring adequate aisle space (4 feet), that all labels are visible, containers are closed except when filling, labeling, stenciling of storage containers or responding to any spills. Post the inspection form, until it is filled out, so that it can be easily reviewed by the FMO-E or a regulatory agency. Completed record forms shall be maintained in the **Brown Tab 11 plastic sleeve labeled-Weekly Inspection Log.**



**CHAPTER 7****TRANSPORTATION OF HAZARDOUS WASTE****7-1 POLICY**

- a. Minnesota Army National Guard facilities may either transport wastes directly to the VSQG Collection Program warehouse (DOL warehouse) or have the DOL Warehouse coordinate the pickup of their wastes.
- b. VSQG's with waste to transport are required to contact the DOL warehouse at least a week prior to the desired pickup date. The DOL warehouse will determine the type of shipping document that is required. Most VSQG waste can be transported using either the DA Form 2765-1 or the MNGR form 200-3-0704. Hazardous waste that is to go straight to a Treatment Storage and Disposal Facility (TSDF) from the VSQG, rather than to the DOL warehouse, will require a hazardous waste manifest. The only waste streams that are transported straight to a TSD facility are parts cleaning solvent wastes. **OMS's should be the only VSQG facilities with these parts cleaning solvent wastes.**

**7-2 SHIPPING PAPER PROCEDURES TO TRANSPORT REUSABLE HAZARDOUS MATERIALS, HAZARDOUS WASTE OR SPECIAL/UNIVERSAL WASTE.**

- a. VSQG's that have **Reusable Hazardous Materials** requiring transport to the DOL warehouse must submit DA Form 2765-1 at least a week prior to the pickup date. This will allow the DOL Warehouse time to review the shipping paper to ensure that all information is correct. (Section 8-3.1 describes how to fill out DA Form 2765-1).
- b. VSQG's that have **Hazardous Wastes** requiring transport to the DOL warehouse must submit either MNGR 200-3-0704 or DA Form 2765-1 at least a week prior to the pickup date. This will allow the DOL Warehouse time to review the shipping paper to ensure that all information is correct. (Section 8-3.2 describes how to fill out MNGR 200-3-0704).
- c. VSQG's that have **Special/Universal Wastes (see Chapter 8-3.a for a list)** requiring transport to the DOL warehouse must submit either MNGR 200-3-0704 or DA Form 2765-1 at least a week prior to the pickup date. This will allow the DOL warehouse time to review the shipping paper to ensure that all information is correct.
- d. Copies of these completed Shipping Papers shall be placed in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers.**

**7-3 MANIFEST PARTS CLEANING SOLVENT (OMS's Only)**

- a. The state contracted vendor contractor will periodically pump out and replenish solvent in your facility parts washer. When servicing the parts washer, the contractor will provide a completed manifest and land disposal restriction (LDR) form, if the LDR is required.
- b. The FEC or other designated facility personnel will sign the manifest in block 16 for the generator. The driver will sign block 17 as Transporter 1 on the manifest.
- c. The contractor will provide copies six, seven and eight of the manifest. Copy seven is to be sent to the Minnesota Pollution Control Agency at the address at the top of the manifest. Copy six is to be sent to another states regulating agency if the waste is shipped to that state. Copy eight is to be kept by the facility.
- d. When using a Minnesota manifest, the TSDF will return copy three, signed in block 20, usually within one week. **If copy three is not received within 35 days, the FMO-E must be**

**notified at (612) 632-7566. Copies three and eight should be stapled together and filed in the Brown Tab 6 plastic sleeve labeled- Facility Manifests.** Copies three and eight will be kept as permanent records. When using other states manifests refer to Brown Tab 6 for additional directions specific to that state.

#### **7-4 LOADING/SEGREGATION OF CONTAINERS**

- a. Loading of hazardous waste will comply with the following:  
(Use Figure 7-1, as a guide, or contact the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN #871-7488, if in doubt)
  - (1) All containers will be loaded so that they are secured against movement.
  - (2) No tools or equipment likely to damage the container will be used for loading or unloading.
  - (3) Containers must not be transported with foodstuff or other edible material.
  - (4) Containers must be intact and be properly labeled and marked.
- b. Wastes will be segregated to prevent accidental mixing of incompatible wastes or materials in the vehicle. Guidelines include:
  - (1) Acid containers must be separated from other acids, basic containers and ignitable compounds.
  - (2) Antifreeze sludge containers must be separated from most acids and caustic compounds.



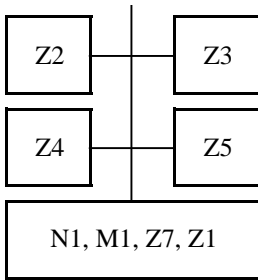


Figure 7-1

<b>FORM 200-3-0702</b> <b>HAZARDOUS WASTE DOCUMENT REGISTER</b>
--

**GENERATOR NAME:** \_\_\_\_\_

**FACILITY EPA ID #:** \_\_\_\_\_

**YEAR:** \_\_\_\_\_

DATE	MANIFEST # or TYPE OF SHIPPING PAPER USED	TRANSPORTER NAME	HM	DOT PROPER SHIPPING NAME (COLUMN 2 of TABLE 8-1)	CONTAINER		TOTAL QUANTITY	EPA WASTE ID #
					NO.	TYPE		

**Call the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN #871-7488, FMO-E at (320) 632-7566 or Utilize Table 8-1 in MNGR 200-3 to fill out this register.**

**FORM MNGR 200-3-0704**  
**MINNESOTA ARMY NATIONAL GUARD**  
**HAZARDOUS MATERIAL/SPECIAL WASTE SHIPPING PAPER**

(1) SHIPPED TO: \_\_\_\_\_

(2) SHIPPED FROM: \_\_\_\_\_

(3) DATE SHIPPED: \_\_\_\_\_

(4) DATE RECEIVED: \_\_\_\_\_

**D.O.T. DESCRIPTION**

(5) Proper Shipping Name \_\_\_\_\_

(6) Hazard Class \_\_\_\_\_

(7) UN/NA Identification Number \_\_\_\_\_

**CONTAINERS**

(8) Number of Containers \_\_\_\_\_

(9) Type of Containers \_\_\_\_\_

**TOTAL QUANTITY**

(10) Weight in Pounds \_\_\_\_\_

(11) Number of Gallons \_\_\_\_\_

**ADDITIONAL DESCRIPTION FOR MATERIAL LISTED ABOVE**

(12) National Stock Number \_\_\_\_\_

(13) Special  
Packaging Instructions \_\_\_\_\_

(14) Emergency Contact \_\_\_\_\_

**SHIPPER'S CERTIFICATION:** "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

\_\_\_\_\_  
**Shipper's Name**

\_\_\_\_\_  
**Signature**

\_\_\_\_\_  
**Date**

Guidelines for filling out the 200-3-0704 Shipping paper, if there is any doubt on filling out the shipping paper then contact the DOL or the FMO-E. **Do Not Guess.**

- (1) Shipped to:
  - (a) Most materials/wastes will be shipped to the DOL Warehouse.
  - (b) Antifreeze that is to be recycled will be shipped to the CSMS or the supporting OMS for your area.
  - (c) Fluorescent bulbs will be shipped to Solid Waste Transfer facility at Camp Ripley.
  - (d) Used oil and filters are to be shipped to one of the sites listed in 8-5.2.
  - (e) Parts cleaning materials will require a manifest (see section 8-5).
  - (f) Used automotive batteries will be picked up at the OMS facility on a vendor-scheduled basis.
  - (g) Used shop rags are to be delivered to the DSU Warehouse.
- (2) Shipped from: Facility name.
- (3) Date shipped: Date shipped.
- (4) Date received: Date the DOL or other entity receives the waste.

#### **DOT DESCRIPTION**

- (5) Proper Shipping Name: See Table 8-1 in the MNGR 200-3.
- (6) Hazard Class: See Table 8-1 in the MNGR 200-3.
- (7) UN/NA Identification Number: See Table 8-1 in the MNGR 200-3.

#### **CONTAINERS**

- (8) Enter the number of containers for the waste listed in #5 above.
- (9) Enter the type of container: See Table 8-1 in the MNGR 200-3.

#### **TOTAL QUANTITY**

- (10) Enter the weight of the container, if known.
- (11) Enter the number of gallons of the waste/material.

#### **ADDITIONAL DESCRIPTION FOR MATERIAL LISTED ABOVE**

- (12) Enter the NSN for the hazardous material that will be shipped.
- (13) Enter the Emergency Response Guide # from Table 8-1 in the MNGR 200-3.
- (14) Enter (320) 632-7488, the phone # of the DOL Warehouse Materials Examiner and Identifier.

#### **SHIPPERS CERTIFICATION**

The designated hazardous waste manager or equivalent must sign and date the shipping paper.

**VSQG Facility Driver Training  
Form MNGR 200-3-0705**

All MNARNG personnel who transport hazardous waste from their VSQG facility to the DOL Warehouse VSQG Collection Program site are required to read, initial and sign this document.

This is a Minnesota Department of Transportation (Mn/DOT) requirement. **Initial each topic:**

\_\_\_\_\_ **Volume.** Do not transport more than 1,000 lbs, about 1½ drums of liquid. Transporting more than 1,000 lbs will require a Commercial Drivers License (CDL) with a hazardous materials endorsement.

\_\_\_\_\_ **Containers.** Use container instructions listed in MNGR 200-3, Chapter 5 and Table 8-1 of Chapter 8.

\_\_\_\_\_ **Marking and Labeling.** Follow marking and labeling requirements of MNGR 200-3, Chapter 5 and Table 8-1 of Chapter 8.

\_\_\_\_\_ **Packaging requirements.** VSQG facilities should not attempt to package different waste streams together. Incompatible wastes must not be packaged together. Some incompatible wastes include: Acids and Bases, Acids and Cyanides, Acids and Pesticides, Oxidizers and Ignitable or Flammable Materials, Oxidizers and Pesticides. Contact the DOL warehouse\* prior to packaging

\_\_\_\_\_ **Transport vehicle size.** Use a 1-ton truck or smaller to transport waste. If a vehicle or vehicle trailer combination weighing more than 10,000 pounds gross weight is used then the following are also required:

- Motor carrier liability insurance of at least \$1,000,000.
- Driver must meet DOT driver qualification requirements.
- Driver must meet DOT vehicle maintenance requirements.

\_\_\_\_\_ **Load segregation.** Follow load segregation requirements of MNGR 200-3, Chapter 7.

\_\_\_\_\_ **Load security requirements:**

- Secure containers to prevent abrasive motion or contact with other containers in the load. Boxes with cardboard inserts may be ideal for keeping cans and other containers from rubbing each other during transport.
- Secure each container and other equipment such as spare tires, jacks, etc. to prevent movement within the truck bed or vehicle by using straps, strong rope or other means to secure the load.

\_\_\_\_\_ **Vehicle safety and spill requirements.** The vehicle must be equipped with a 10lb B:C fire extinguisher in an area immediately accessible to the driver.

\_\_\_\_\_ **Requirements during transport:**

- The shipping paper must always be kept within reach of the driver. If the driver must leave the vehicle for a short time, leave the shipping paper on the driver's seat.
- Don't transport any items not on the shipping paper.
- Driver must know the location of the emergency phone number listed on the shipping paper.
- Waste must be delivered directly to the DOL Warehouse VSQG Collection site.

\_\_\_\_\_ **Accidents.** MNARNG personnel are responsible for any accidents or mishaps that occur during transport of their waste to the DOL Warehouse VSQG Collection Program site.

\* If you have questions about any of these requirements then contact the DOL warehouse Materials Examiner and Identifier at (320) 632-7488 or contact the FMO-E Environmental Specialist at (320) 632-7566 (x7565). Place signed copy of this in **the Brown Tab 3 Plastic Sleeve labeled-Training Records.**

\_\_\_\_\_  
VSQG Facility Drivers Name (Print)

\_\_\_\_\_  
VSQG Facility Drivers Signature and Date

**CHAPTER 8****SPECIFIC WASTE DISPOSAL PROCEDURES****8-1 POLICY**

The DOL Supply and Services Division Warehouse (DOL Warehouse) is a Very Small Quantity Generator (VSQG) Collection Program site. This permits the DOL Warehouse the right to assume responsibility for all MNARNG VSQG's (Generator) waste that is delivered to the DOL Warehouse for disposal. This chapter will summarize all requirements to be followed to properly mark, label, store and transport VSQG waste streams.

**8-2 GENERAL**

- a. The VSQG facility (Generator) will properly package, mark and label hazardous wastes according to Chapters 5 and 7 of this regulation before shipment off site. If in doubt, contact FMO-E or the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN # 871-7488.
- b. A generator will immediately submit turn-in documents to the DOL Warehouse when a hazardous waste container is filled, as per MNARNG 200-3 policy stated in Chapter 2-5 and Chapter 6-3.b. All paperwork must be submitted at least one week prior to the desired pick up or transport date. This will allow the DOL Warehouse time to review the shipping paper and to ensure that it is filled out correctly. This will also allow the DOL warehouse sufficient lead-time to schedule pickup or delivery of the waste and ensure that the generator storage time limits aren't exceeded.
- c. Turn-in documents will include DA Form 2765-1 for shipments of hazardous materials/reusable materials and, in place of DA Form 2765-1, generators may use MNGR 200-3-0704 as a shipping paper for hazardous wastes. DA Form 2765-1 may be used for both hazardous materials/reusable materials and hazardous waste shipments.
- d. Once approval has been received the generator can arrange for the DOL Warehouse to either pick up their waste, or the generator may transport the waste to the warehouse. The generator must follow all Chapter 5 and 7 requirements if they are transporting the waste.

**8-3 SHIPPING PAPERS FOR HAZARDOUS AND SPECIAL/UNIVERSAL WASTES  
(DA Form 2765-1 and MNGR 200-3-0704)**

The Minnesota Pollution Control Agency (MPCA) currently has a Pilot Project in place for **Special Wastes**. This project allows generators the option to handle some current hazardous waste streams as Special Wastes. By the end of 2001 the MPCA will establish a new program for Universal Wastes that will replace the Special Waste Pilot Project. Therefore, all references to these waste will be listed as Special/Universal Waste.

- a. All VSQG's will ship hazardous wastes with shipping papers with the exception of parts cleaning solvents picked up under contract at the facility. A manifest, provided by the contract vendor, will be required for the parts cleaning solvent.
- b. The following are Special Waste/Universal Wastes and are to be shipped with a shipping paper:  
**Antifreeze, PCB light ballasts, Dry cell batteries (Alkaline, Ni-Cd, Lithium, Mercury, Magnesium) and Fluorescent/HID bulbs.**
- c. If the special wastes are managed as described above, then they **do not** count toward generator size. Generators must ensure that all required forms are on hand; the MNGR 200-3-0704 can be copied from the sample provided in Chapter 7 or Brown Tab 7 of the MNGR 200-3. The

DOL Warehouse will have all required forms, labels and containers. Order all required items from the Materials Examiner and Identifier at (320) 632-7488 or DSN # 871-7488.

### 8-3.1 PREPARATION OF DA FORM 2765-1 FOR HAZARDOUS MATERIALS, HAZARDOUS WASTE AND SPECIAL/UNIVERSAL WASTE TURN-INS

- a. One DA Form 2765-1 must be prepared by the generator for each type of hazardous waste to be turned in. The DOL requires that generators submit shipping forms at least one week prior to desired pickup or delivery date. This will give the DOL time to review the shipping paper to ensure that it is filled out correctly. **DO NOT GUESS. Place copies of all shipping papers in the Brown Tab 7 plastic sleeve labeled-Shipping Papers.** Below are instructions by block number and some examples.

(1) Block A. Shipping destination.

- (a) Most materials/wastes will be shipped to the DOL Warehouse.
- (b) Antifreeze that is to be recycled will be shipped to the CSMS or the supporting OMS for your area.
- (c) Fluorescent bulbs will be shipped to the Solid Waste Transfer facility at Camp Ripley.
- (d) Used oil and oil and fuel filters will be shipped to one of the sites listed in 8-5.2.
- (e) Used parts cleaning materials will require a manifest, see section 8-5.
- (f) Used automotive batteries will be picked up at the OMS facility on a vendor-scheduled basis.
- (g) Used shop rags are to be delivered to the DSU Warehouse.

(2) Block B. Enter the shop name and facility EPA Identification Number, (Chapter 4 lists all facility ID #'s).

(3) Blocks 4-8. Enter Federal Stock Number (if known), unit of issue, and quantity of waste, in accordance with DA PAM 710-2-1.

(4) Leave blocks 9 to 14 and blocks C to N blank.

(5) Block O. Enter all DOT proper shipping name (PSN) information found in column 2 of Table 8-1, or contact the DOL or FMO-E if in doubt.

**[Antifreeze sludge is used as an example: Hazardous waste, liquid, N.O.S. (Lead, Cadmium), 9, NA 3082, PG III, ERG #171].**

(6) Block P. Enter turn-in as "Hazardous Waste", "Hazardous Material" or "Special Waste" and indicate special information known about the waste. Such as: "Paint thinner containing approximately 20% paint solids" etc.

(7) Leave blocks Q to S and block U blank.

(8) Block T. **Initial and enter the date of submittal of DA Form 2765-1.**

(9) Block V. Designated DOL personnel will date and sign form upon receipt of waste at the DOL.

- b. DA Form 2765-1 will be submitted to the DOL Warehouse for review. The DOL Warehouse may require the submittal of the accumulation log, if applicable and will arrange for pick up or the delivery of the waste. The generator must follow all Chapter 5 and 7 requirements if they are transporting the waste.

**8-3.2 PREPARATION OF MNGR 200-3-0704 for HAZARDOUS WASTE AND SPECIAL/UNIVERSAL WASTE (Use Table 8-1 to prepare shipping papers)**

- a. A MNGR 200-3-0704 must be prepared by the generator for each type of hazardous waste to be turned in. Instructions below reference the numbers on the form. The DOL Warehouse requires that forms be submitted at least one week prior to desired pickup or delivery date. This will give them time to review the shipping paper to ensure that it is filled out correctly. If at all in doubt on how to fill out this form contact the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN 3871-7488. **DO NOT GUESS. Place copies of all shipping papers in the Brown Tab 7 plastic sleeve labeled-Shipping Papers.**

**(1) SHIPPED TO:**

- (a) Most wastes will be shipped to the DOL Warehouse.
- (b) Antifreeze that is to be recycled will be shipped to the CSMS or the supporting OMS for your area.
- (c) Fluorescent bulbs will be shipped to Solid Waste Transfer facility at Camp Ripley.
- (d) Used oil and filters are to be shipped to one of the sites listed in 8-5.2.
- (e) Parts cleaning materials will require a manifest see section 8-5.
- (f) Used automotive batteries will be picked up at the OMS facility on a vendor-scheduled basis.
- (g) Used shop rags are to be delivered to the DSU Warehouse.

**(2) SHIPPED FROM: Facility name.****(3) DATE SHIPPED: Date the VSQG shipped the waste.****(4) DATE RECEIVED: Date the DOL Warehouse or other entity receives the waste.****DOT DESCRIPTION**

**(The information for waste antifreeze from Table 8-1 was used as an example, and is listed below in bold type)**

- (5) Proper Shipping Name: See Table 8-1, column 2. [**Hazardous Waste, liquid, N.O.S. (Lead, Cadmium)**]
- (6) Hazard Class: See Table 8-1, column 2. [**9**]
- (7) UN/NA Identification Number: See Table 8-1, column 2. Ex.: [**NA 3082**]

**CONTAINERS**

- (8) Enter the number of containers for the waste listed in #5 above.
- (9) Enter the type of container: See Table 8-1, column 4 or Chapter 5.

**TOTAL QUANTITY**

- (10) Enter the weight of the container, if known.
- (11) Enter the number of gallons of the waste/material or the size of the container.

**ADDITIONAL DESCRIPTION FOR MATERIAL LISTED ABOVE**

- (12) Enter the NSN for the hazardous material that will be shipped. Use information that is listed on the original packaging.
- (13) Enter the Packing Group # and Emergency Response Guide # from Table 8-1, column 2.
- (14) Enter the phone # of the Waste Material Identifier: **(320) 632-7488.**

**SHIPPERS CERTIFICATION**

The designated Facility Environmental Coordinator (FEC) or equivalent must sign and date the shipping paper.

### 8-3.3 WASTE TABLE EXPLANATION

- a. Table 8-1 that follows on the next page is meant as a guide to assist with filling out shipping papers and as a guide for marking and labeling containers. **If you're at all in doubt about filling out DA Form 2765-1 or MNGR 200-3-0704 contact the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN # 871-7488.** Reference the previous two sections to determine where to place the information contained in Table 8-1.
- b. Column 1 is the commonly used name of the waste. This is the name that material/waste is most often referred to. The section of text dealing with management of the waste is also listed.
- c. Column 2 has the following information: **(Antifreeze sludge information is listed in bold text as an example).**
  - (1) The DOT Proper Shipping Name (PSN) [**Hazardous waste, liquid, N.O.S. (Lead, Cadmium)**].
  - (2) The Hazard Class (**9**).
  - (3) The UN or NA # (**NA 3082**),
  - (4) The Packing Group of the waste, either I, II or III. This number reflects level of care required for the waste. The lower the number the more care that is required. (**PG III**).
  - (5) The Emergency Response Guide number (ERG#). This number references emergency procedures to be followed in the event of a release of the material/waste being transported (**ERG #171**).
- d. Column 3 has the EPA Waste ID #. This number designates the waste type. Some examples are D001 for flammable waste and D002 for corrosive waste. (**D006, D008**).
- e. Column 4 has the type of container that is required for the waste. The proper container type is required to prevent reactions between the container and the waste. Reference Chapter 5 for more container information. (**Plastic or Metal**).
- f. Column 5 has the type of waste decal that is required. This decal will indicate hazards associated with the waste. Some examples of decals are the red #3 flammable liquid and the black #8 corrosive. See Chapter 5 for more label information (**Class 9**).

**TABLE 8-1**

<b>Common Waste Name (See Section # __ for more info)</b>	<b>Proper Shipping Name (PSN), Hazard Class, UN # or NA #, Packing Group #, ERG #</b>	<b>EPA Waste ID#</b>	<b>Type of Container</b>	<b>Waste Decal</b>
Waste Antifreeze Section 8-5.1	Hazardous Waste, liquid, N.O.S. (Lead, Cadmium), 9, NA 3082, PG III ERG #171	D006, D008	Plastic or Metal	Class 9
Antifreeze sludge Section 8-5.1a	Hazardous Waste, liquid, N.O.S. (Lead, Cadmium), 9, NA 3082, PG III ERG #171	D006, D008	Plastic or Metal	Class 9
Battery-Alkaline Section 8-5.2	Waste Batteries, dry, containing Potassium Hydroxide Solid, 8, UN 3028, PG III ERG #154	D002	Plastic	Corrosive
Battery-Lithium Section 8-5.2	Lithium Battery, 9, UN 3090, PG II ERG #138	D003	Plastic	Class 9
Battery-Magnesium Section 8-5.2	Hazardous Waste Solid, N.O.S. (Magnesium Dioxide), 9, UN3077, PG111 ERG #154	D007	Plastic	Class 9
Battery-Mercury Section 8-5.2	Waste Batteries, dry, containing Potassium Hydroxide Solid, 8, UN 3028, PG III ERG #171	D007	Plastic	Class 9
Battery- Nickel Cadmium Section 8-5.2	Waste Batteries, wet, filled with alkali, 8, UN2795, PGIII ERG #154	D006	Plastic	Corrosive
Battery-Lead Acid (Non-automotive) Section 8-5.2	Battery, wet, non- spillable, electric storage, 8, UN 2800, PG III ERG #154	D002	Plastic	Corrosive
Calcium Hypochlorite Section 8-5.3	Waste Calcium Hypochlorite, dry, 5.1, UN 1748, PG II ERG #140		Plastic	Oxidizer
Paint Related Materials Section 8-5.4	Waste Paint Related Materials, 3, UN 1263, PG III (Mineral Spirits, Turpentine), ERG #128	D001	Metal	Flammable
PCB Light Ballasts Section 8-5.5	Waste PCBs, solid, 9, UN 2315, PG III ERG #171	MN03	Plastic box	Class 9
Shop Rags For laundering Section 8-5.6	Non-Regulated Label Label as "Rags to be laundered". Place rags in a plastic bag, tape bag closed.		Plastic Bag	
Waste Protective Mask Filters	Hazardous Waste Solid, N.O.S., (Chromium), 9, NA3077 PG III	D007	Plastic	Class 9

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<b>Common Waste Name (See Section # __ for more info)</b>	<b>Proper Shipping Name (PSN), Hazard Class, UN # or NA #, Packing Group #, ERG #</b>	<b>EPA Waste ID#</b>	<b>Type of Container</b>	<b>Waste Decal</b>
Lead from Shooting Ranges Section 8-5.8	Hazardous waste, solid, N.O.S. (Lead), 9, NA 3077, PG III ERG #171	D008	Metal	Class 9
Chemical Test Kit M72A2 Section 8-5.7	Toxic liquid, corrosive, organic, N.O.S. (Acetic Acid, Dimethyl Sulfate), 6.1, UN 2927, PG I ERG #154	D002	Plastic	Corrosive, Poison
Photochemicals Section 8-5.9	Hazardous waste, liquid, N.O.S. (Silver), 9, NA 3082, PG III ERG #171	D011	Metal or Plastic	Class 9
Toner Section 8-5.10	Flammable liquids, N.O.S. (Isoparrafanic Hydrocarbon), 3, UN 1993, PG III ERG #128		Metal or Plastic	Flammable
Used Oil Section 8-5.11	Used Oil	D001	Metal	Flammable
Fluorescent Bulbs Section 8-5.12	Hazardous waste, solid, N.O.S. (Mercury), 9, NA 3077, PG III ERG #171	D009	Original Fiber box or equivalent	Class 9
Lead-Acid Vehicle Battery Section 8-5.13	No label required. Vendor will pick up used batteries on a scheduled basis and will handle all labeling requirements.			
Used Filters-Metal Canister type Section 8-5.14	None-Once drained and crushed they are solid waste scrap metal.	None	Metal	None
Parts Cleaning Materials Section 8-5.15	Vendor will provide all required labeling information or will provide labels that are already filled out.	D001	Metal	Flammable

#### **8-4 HAZARDOUS WASTE HANDLING PROCEDURE CHANGE DISCLOSURES AND NEW WASTE STREAM NOTIFICATIONS**

- a. All generators of hazardous waste must maintain up-to-date information on waste handling procedures. If procedures change then the generator must have this information disclosed to various regulatory agencies.
- b. The generation of new waste streams resulting from a procedure change or from the use of new materials must also be disclosed to regulatory agencies.
- c. See Chapter 4-4 for detailed instructions on disclosure procedures.

<b>Common Waste Name (See Section # __ for more info)</b>	<b>Proper Shipping Name (PSN), Hazard Class, UN # or NA #, Packing Group #, ERG #</b>	<b>EPA Waste ID#</b>	<b>Type of Container</b>	<b>Waste Decal</b>
Lead from Shooting Ranges Section 8-5.8	Hazardous waste, solid, N.O.S. (Lead), 9, NA 3077, PG III ERG #171	D008	Metal	Class 9
Chemical Test Kit M72A2 Section 8-5.7	Toxic liquid, corrosive, organic, N.O.S. (Acetic Acid, Dimethyl Sulfate), 6.1, UN 2927, PG I ERG #154	D002	Plastic	Corrosive, Poison
Photochemicals Section 8-5.9	Hazardous waste, liquid, N.O.S. (Silver), 9, NA 3082, PG III ERG #171	D011	Metal or Plastic	Class 9
Toner Section 8-5.10	Flammable liquids, N.O.S. (Isoparrafanic Hydrocarbon), 3, UN 1993, PG III ERG #128		Metal or Plastic	Flammable
Used Oil Section 8-5.11	Used Oil	D001	Metal	Flammable
Fluorescent Bulbs Section 8-5.12	Hazardous waste, solid, N.O.S. (Mercury), 9, NA 3077, PG III ERG #171	D009	Original Fiber box or equivalent	Class 9
Lead-Acid Vehicle Battery Section 8-5.13	No label required. Vendor will pick up used batteries on a scheduled basis and will handle all labeling requirements.			
Used Filters-Metal Canister type Section 8-5.14	None-Once drained and crushed they are solid waste scrap metal.	None	Metal	None
Parts Cleaning Materials Section 8-5.15	Vendor will provide all required labeling information or will provide labels that are already filled out.	D001	Metal	Flammable

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- c. See Chapter 4-4 for detailed instructions on disclosure procedures.

## 8-5 INSTRUCTIONS FOR HANDLING WASTES

- a. Each waste stream listed in Table 8-1 has management instructions to follow.
- b. Use these management instructions with the data in Table 8-1 to ensure that correct waste handling procedures are followed. Contact the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN #871-7488 if in doubt.

### 8-5.1 MANAGING USED ANTIFREEZE (Coolant)

- a. Efforts should be made to avoid generating automotive antifreeze waste at the TACC's.
  - (1) Used (diluted) antifreeze (ethylene glycol) is often regulated as a hazardous waste. If the material does not exceed the toxicity characteristics making it a hazardous waste, it is defined and managed as a special waste.
  - (2) Used antifreeze may not be disposed of on the ground, in storm sewers, septic tanks, and municipal sanitary sewers or mixed with used oil.
  - (3) Used antifreeze will be turned into the DOL Warehouse only if on-site recycling is not available or not available through a MNARNG facility (i.e. supporting OMS or the CSMS).
  - (4) Any antifreeze that is to be recycled must be free of POL (petroleum, oil and lube) contaminants. This could require additional processing by the generator.
    - (a) When servicing vehicle coolant, place coolant that has been POL contaminated in one drum and coolant that is clean in another for direct turn-in to DOL Warehouse, supporting OMS or CSMS.
    - (b) Let POL contaminated coolant set for a period of time to allow POL contaminants to separate from antifreeze then transfer antifreeze by pumping or siphoning into a clean drum.
    - (c) Transfer the remaining POL contaminated material either into the used oil drum or other drum and manage the waste as antifreeze sludge.
    - (d) To transport antifreeze for recycling use either DA Form 2765-1 or MNGR 200-3-0704. Complete forms and labels utilizing Table 8-1 or contact the DOL Warehouse (see 8-5).
- b. Place copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

### 8-5.1a MANAGING USED ANTIFREEZE SLUDGE FROM RECYCLING OPERATIONS

- a. **The only VSQG's that will use these management instructions are OMS's.**
  - (1) Contact DOL Warehouse or use the instructions in Table 8-1 to complete shipping papers, and to mark and label containers (see 8-5.b).
  - (2) Coordinate with the DOL Warehouse for waste disposal (see Chapter 5 and 7).
- b. Recycled antifreeze sludge could potentially contain high concentrations of Lead and Cadmium which are both hazardous wastes.
- c. Place a copy of shipping paper in the **Brown Tab7 plastic sleeve labeled-Shipping papers**.

### 8-5.2 MANAGING BATTERIES

a. The management of most disposable batteries generated by the MNARNG are subject to special/universal waste regulations. See 8-3.b for a list of the batteries.

- (1) No more than 50 pounds of waste batteries can be placed in a cardboard container. Greater quantities have a tendency to burst cartons during handling.
- (2) An alternate to the cardboard containers is the plastic drum in 14 gallon and 30 gallon capacities available from the DOL Warehouse (see 8-5.b).
- (3) Waste batteries containing liquid shall be stored in closed containers that are vented and corrosion preventive. A loosened cover or unsnapped ring may provide adequate venting.
- (4) Batteries are separated by type and are listed below:

**TABLE 8-2**

<b>Battery Type</b>	<b>NSN</b>	<b>Model</b>	<b>Battery Type</b>	<b>NSN</b>	<b>Model</b>
Lithium	6135-01-088-2708 6135-01-034-2239 6135-01-036-3495 6135-01-090-5364 6135-01-090-5365	BA 5588/U BA 5598/U BA 5590/U BA 5847/U BA 5567/U	Mercury	6135-00-935-2533 6135-00-935-2532 6135-01-090-5365 6135-00-926-0827 6135-00-073-8939 6135-00-299-6918 6135-00-801-3493 6135-00-961-3663	BA-1396/U BA-1391/U BA-1567/U BA-1100/U BA-1574/U BA-1006/U BA-1372/U BA-1389/U
Alkaline	6135-00-930-0030 6135-00-557-3340 6135-00-450-3528 6135-01-063-1978 6135-00-826-4798 6135-00-900-2139 6135-00-935-2587 6135-00-935-5301 6135-00-643-1309	BA-3030/U BA-3058/U BA-3517/U BA-3090/U Common AAA  BA-3058/U BA-3042/U Common AA	Nickel Cadmium	6140-00-454-8261 6140-00-214-8255 6140-01-046-1116 6140-01-056-5321 6140-01-084-1460	BB-287     BB-586/U
Zinc/ Carbon	6135-00-050-3280	BA-200/U BA-505/U	Magnesium	6135-00-926-8322	BA-4386/U BA-4326/U

6135-00-926-0844	BA-399/U			
6135-00-926-0845	BA-2161			
6135-00-160-7159	Common 6-Volt			
6135-00-643-1310				

(5) The LeClanche battery that contains zinc or zinc chloride carbon, as its main components will be disposed of as an alkaline battery. Utilize the alkaline battery paperwork for the turn-in of these batteries.

- b. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

### 8-5.3 MANAGING CALCIUM HYPOCHLORITE MATERIALS/WASTES

The environmental and safety concern of Calcium Hypochlorite is the chlorine. Exposure to chlorine can produce adverse affects on the eyes, skin and respiratory system. There is also a fire risk danger if Calcium Hypochlorite contacts an organic material.

- Place unused, expired or unneeded Calcium Hypochlorite containers into proper disposal container.
- Mark and label containers, use Table 8-1 or contact the DOL Warehouse (see 8-5) for instructions.
- Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

### 8-5.4 MANAGING PAINT-RELATED WASTES

- Solid and liquid paint waste management is as follows.
  - MNARNG facilities produce many different types of paint-related waste.
  - Minnesota State law requires any facility producing a waste to evaluate the waste to determine if it is hazardous.
  - Properly evaluating a paint or paint-related waste includes answering four questions: Is the paint waste a listed waste? Is the paint waste one of the characteristic wastes: Ignitable, Corrosive or, Characteristic Toxic? Latex paint is typically not hazardous.
  - Empty paint containers, containing no liquid, can be disposed of as common garbage unless scrap metal recycling is available.
  - Most often, small amounts of **dry** paint can be disposed of as common garbage. Contact your local solid waste official to determine if your local solid waste facility will accept a small amount of **dry** paint, or contact FMO-E for any additional assistance. Liquid paint may not be landfilled.
  - Examples of paint-related wastes that are frequently hazardous:
    - Unusable liquid paints or stains.
    - Paint thinner wastes of all types.
    - Scrapings from booth walls and floors.
    - Paint stripping waste.
    - Rags containing paint and/or solvent.
  - For assistance in determining if your paint-related wastes are hazardous, contact DOL Warehouse (see 8-5.b).

- b. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.
- c. **Management of Aerosol Containers (Paint, lubricant, solvent):**
  - (1) Aerosol containers are pressurized and may contain flammables or poisonous chemicals and when unusable, and still have contents inside, are to be managed as a Hazardous waste. Contact the DOL warehouse (see 8-5) if you have any questions on proper disposal.
  - (2) To avoid management of aerosol containers as hazardous waste, personnel should plan ahead to use up all contents of the container once it is opened.
  - (3) Empty containers may then be disposed of as common garbage.

### **8-5.5 MANAGING POLYCHLORINATED BIPHENYLS (PCB's) LIGHT BALLASTS**

- a. Fluorescent bulb light ballasts are the only PCB waste that should be found at VSQG's. For the purpose of this regulation, "PCB" means the class of organic compounds known as polychlorinated biphenyls at a concentration of 50 parts per million or greater. PCB's have adverse effects on the skin and liver and interfere with genetic mechanisms. They may also cause cancer. Traces of PCB's have been detected in all forms of fish, birds and mammals, including the fat of almost all humans tested.
- b. PCB Light Ballasts are to be managed as Special/Universal Wastes.
  - (1) Ballasts from fluorescent light fixtures are to be removed and placed in an open-head metal drum with absorbent material.
  - (2) Read labels on used ballast. If label states "Contains No PCB's", the ballast may be disposed of as solid waste. If not specifically labeled as containing no PCB's, the ballast must be disposed of as special/universal waste.
- c. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

### **8-5.6 MANAGING RAGS, SHOP TOWELS AND DISPOSABLE WIPES**

- a. Rags and towels consist of cloth, absorbent material and paper.
  - (1) Shop rags, towels and wipes that are soaked with solvent and POL products are considered a hazardous waste.
  - (2) If disposable wipes are used and put in the trash, these same contaminants end up in a landfill where they may leach into the groundwater. If incinerated, contaminants may contaminate the air.
  - (3) Management of disposable wipes (paper towels):
    - (a) Solvent and POL product soaked towels are to be managed as a hazardous waste. These towels must not be placed in the trash.
    - (b) Most recent test results indicate that towels used for weapons cleaning, and not saturated or thoroughly soiled, are non-hazardous and can be handled as common trash.
    - (c) The FEC or ECO may contact the FMO-E to determine if towels require sampling..
    - (d) Follow hazardous waste management requirements for rags.
- b. Management of **rags** through the DSU Warehouse (Contract Rag Service) **OMS's Only**.
  - (1) For **OMS facilities**, the DSU Warehouse at Camp Ripley is the central exchange service area for all shop rags.
  - (2) MNARNG manages its shop rags by use of a contract shop rag service.

- (3) **New MPCA rules require that the rags be transported in a “covered container” when being transported.** The use of a plastic tub or trash container that has a lid will meet this requirement. This container **does not** have to be a drum with a locking lid.
  - (4) **"F-listed" solvents** should not be used with rags since the rags will need to be managed as a hazardous waste. Examples of "F-listed" solvents include the following:  
1,1,1 Trichloroethane, Carbon Tetrachloride, Methylene Chloride  
Toluene and Xylene
  - (5) Exchange soiled rags for clean rags in lots of 50. Place soiled rags in a plastic bag and tape the bag shut. Place the bag of rags in a covered plastic container, and transport them to be placed in one of the three soiled rag containers, at the DSU Warehouse.
  - (6) An accounting system for tracking generation of soiled rags is required. The quantity of rags and date turned in are to be provided to the DSU Warehouse.
  - (7) Containers used to collect soiled rags at the OMS shall be painted red with a label designating contents (See Table 8-1). The following are approved metal containers:  
6-gallon (7240-00-282-8411)  
10-gallon (7240-00-256-7700)  
22-gallon (7240-00-286-5342)
- c. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

#### **8-5.7 MANAGING CHEMICAL DEFENSE MASK FILTERS AND TEST KITS**

- a. These test kits will be shipped intact to the DOL Warehouse. **Don't break them down.**
  - (1) These kits most often contain hazardous waste.
  - (2) Generally these items cannot be re-sold. This prevents items being turned in as hazardous materials for recycling.
  - (3) Obtain the following documents for turn-in to DOL Warehouse:
    - (a) Hazardous Waste Profile (prepared by FMO-E).
    - (b) HMIS information is available through FMO, DOL Warehouse or at the time of procurement.
- b. Place shipping paper copy in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

#### **8-5.8 MANAGING LEAD LAIDEN WASTE FROM SHOOTING RANGES (Range Cleanup and Waste From Bullet Traps)**

- a. The management of most lead waste generated by shooting range activities are subject to the hazardous waste regulations. Facilities must conform to all the appropriate hazardous waste regulations.
  - (1) Collect waste and place in DOT approved 5-gallon container obtained from the DOL warehouse. Keep container closed except when filling.
  - (2) Five gallon sized containers should be used to reduced weight of lead.
- b. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

**8-5.9 MANAGING PHOTO CHEMICALS**

- a. This waste stream is not common. The majority of this waste should be left in original containers and then placed into a shipping container. See Table 8-1, Chapter 5 or contact the DOL warehouse for instructions.
- b. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

**8-5.10 MANAGING TONER WASTE**

- a. Collect used toner in original container if possible. If not, then use container listed in Table 8-1 or Chapter 5.
- b. Place all toner containers, used or unused, into a shipping container.
- c. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**.

**8-5.11 MANAGING USED OIL**

- a. If used oil is contaminated with other hazardous waste then the used oil becomes hazardous waste. Therefore, great care should be taken to avoid contaminating used oil with other wastes such as gasoline, antifreeze, paint etc. Used oils include lubricating oil, grease, hydraulic oil, gear oil, transformer fluids (non-PCB containing), cutting oil, and tempering or quenching oils.
  - (1) It is illegal to pour used oil on the ground, pour used oil down the drain or sewer, and to apply used oil to roads for dust suppression. Used oil is also prohibited from land disposal by state law. Disposal or Recycling options are re-refining the oil and burning the used oil for energy recovery.
  - (2) Used oil should be collected and stored in facility underground or above ground tanks designated for that purpose. If these tanks are not available at your facility, utilize storage containers specified by the DOL warehouse. Signs shall be attached to all storage tank fill points stating "Used Oil Only". Above ground tanks shall also have signs attached to them stating "Used Oil Only". These storage locations must also be included in required weekly inspections.
  - (3) The following facilities have oil storage contract pick-up:

Combined Support Maintenance Shop  
Building 11-169, Camp Ripley  
Little Falls, MN 56345

Mobilization and Training Equipment Site  
Building 17-1, Camp Ripley  
Little Falls, MN 56345

Organizational Maintenance Shop #14  
Building 11-159 Camp Ripley  
Little Falls, MN 56345

Organizational Maintenance Shop #5  
1220 Rossman Avenue  
Detroit Lakes, MN 56501

Organizational Maintenance Shop #4  
Highway 71 North  
Willmar, MN 56201

Organizational Maintenance Shop #7  
West Reuss Avenue  
Appleton, MN 56208

New Brighton COMF (Twin City Arsenal)  
Highway 96 and Hamline Avenue, Gate 7  
New Brighton, MN 55112

Army Aviation Support Facility  
206 Airport Road  
St. Paul, MN 55107

Organizational Maintenance Shop #1  
14221 Biscayne Avenue  
Rosemount, MN 55068-3438

Organizational Maintenance Shop #2  
1715 Marion Road SE.  
Rochester, MN 55904-5798

Organizational Maintenance Shop #6  
1523 S. Washington  
New Ulm, MN 56073-1799

- c. The following are storage, labeling, marking, loading, transportation, turn-in and record keeping requirements for used oil that is to be transported to one of the sites listed above.
- (1) Store oil in 55 gallon or smaller containers. Store containers in hazardous waste storage facility or other site that complies with the requirements of Chapter 6.
  - (2) Mark containers and labels with information found in Table 8-1 or contact the DOL Warehouse (See 8-5) if in doubt.
  - (3) Before any used oil is placed in the used oil storage facility located at MATES or one of the supporting OMS's, the generator must obtain approval from the Shop Foreman or FEC of that facility.
  - (4) Used oil records should contain, at a minimum, the following information:
    - (a) Generator location,
    - (b) Amounts of used oil transported to OMS or MATES for disposal, and
    - (c) Dates these activities occurred.
- d. Place used oil documents into the **Brown Tab 9 plastic sleeve labeled-Used Oil.**

#### **8-5.12 MANAGING WASTE LAMPS (Fluorescent, mercury vapor, high-intensity discharge)**

- a. Waste lamps will be managed as Special/Universal Waste.
- b. Waste lamps will be delivered to the Solid Waste Transfer facility (SWTF) at Camp Ripley.
  - (1) Lamps have been determined to be a Special/Universal waste when they can no longer be used for their intended purpose. Materials of concern in lamps are mercury and lead. These heavy metals, in very small amounts, can cause health and environmental damage. Ninety percent of the mercury found in the lamp, is contained in the gases of the lamp.
  - (2) Mercury escapes into the atmosphere when lamps are broken. Environmental problems are noted when mercury vapor returns to the ground and into surface waters. A potential health hazard could exist for people who become exposed to the mercury vapor when lamps are broken. Broken bulbs are required to be sealed in a container.
  - (3) Waste lamps must be recycled or reused to qualify as Special/Universal Waste.
 

Management of waste lamps at Camp Ripley:

    - (a) Do not break or crush lamps.
    - (b) Lamps are to be stored in original containers or some other method that will protect them from breaking.
    - (c) Place protected waste lamps in your buildings custodial area or place by recycling boxes for collection by the Camp Engineer's staff.

- (d) Place broken bulbs in a sealed container. Label and mark container with "Contains broken bulbs".

Management of lamps generated outside of Camp Ripley:

- (a) Do not break or crush lamps.
  - (b) Lamps are to be stored in original containers or other protective container that safeguards the bulbs from breaking. Do not transport the lamps by laying them unprotected in the bed of a pickup
  - (c) Generators of waste lamps will transport lamps to Camp Ripley, SWTF.
  - (d) Arrangements for turn-in are required through FMO-M
- (4) Transportation of waste lamps.
- (a) Pack lamps in a way to protect them from breaking.
  - (b) Contact the DOL warehouse (see 8-5.b) or use Table 8-1 to properly mark and label containers.
- (5) Storage Requirements for Lamps:
- (a) The storage area must be marked with notices instructing employees how to pack and label the lamps.
  - (b) Records must be kept on stored lamps, keeping track of the number removed from service each year and the storage location.
  - (c) Storage area must be inspected weekly and recorded on Weekly Inspection Log (MNGR 200-3-0601).
- (6) Record keeping requirements:
- (a) The number of lamps removed from service at the facility during the calendar year. Reported by January 1 on Form MNGR 200-3-0803.
  - (b) The storage location of the lamps.
- c. Place a copy of shipping paper in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers**. Place a copy of the number of bulbs shipped in the **Brown Tab 9 sleeve labeled Fluorescent bulbs**.

### **8-5.13 MANAGING USED LEAD-ACID VEHICLE BATTERIES (OMS's Only)**

- a. This instruction is for OMS facilities only. A contracted vendor will periodically pick up used batteries at OMS facilities. Used or spent lead-acid batteries are considered a hazardous waste. If spent lead-acid batteries are recycled, not all the hazardous waste rules apply.
- b. Indoor battery storage requirements specify that batteries are to be placed on a non-reactive, curbed, impermeable surface with no floor drains. The battery storage area must be checked weekly for cracked or leaking batteries. Use the weekly inspection log to record any discrepancies. (MNGR 200-3-0601, Brown Tab 11).
  - (1) If not stored properly, used lead-acid batteries may leak or spill and cause lead and/or acid contamination of the soil and ground water.
  - (2) Batteries must be stored indoors. Indoors means in a building having a roof and at least three walls which are permanently attached to a floor which lies directly on the ground.
  - (3) Place any cracked or leaking batteries in an acid-resistant, leakproof container. A five-gallon polypropylene pail is adequate for storing a leaking or cracked battery. Allow the container to vent to prevent buildup of vapors.
  - (4) Store batteries upright to prevent leaking from the vent holes and store them no more than five high. Small spills may be neutralized using lime, cement, baking soda or another caustic. Contain the spill material and manage it as a hazardous waste.

- c. The transport vehicle will not transport any other material other than that generated by transporter/generator of the batteries. Place copies of all records in **the Brown Tab 10 plastic sleeve labeled-Used Batteries.**

#### **8-5.14 MANAGING USED OIL AND FUEL FILTERS**

- a. Used oil filters and used diesel fuel filters will be picked up by state contracted service or other FMO-E approved and contracted service. These filters will then be processed and recycled.
  - (1) All filters must first be processed to ensure all free-flowing liquids are drained out. Processing by draining or crushing in Odberg filter crusher meets this requirement.
  - (2) Drained oil must be collected and placed in with used oil.
  - (3) Crushed filters shall be placed in a drum obtained from DOL warehouse, or from the contracted vendor.
  - (4) Ensure that all drums are properly marked and labeled.
  - (5) When two drums are filled, contact FMO-E at (320) 632-7566 to initiate and determine when pick-up of full drums of crushed filters will be made.
  - (6) The contracted vendor will leave empty barrels for additional filter collection after picking up existing crushed filters.
- b. Place copies of all paperwork in **the Brown Tab 10 plastic sleeve labeled Oil and Fuel Filters .**

#### **8-5.15 MANAGING PARTS CLEANING WASTES**

**(OMS's Only) Chapter 7-3 also lists MNARNG facility procedures for manifest use.**

- a. Completed manifest will be provided by the contracted vendor. The Land Disposal Restriction (LDR) form will also be provided, if required.
- b. The FEC or other designated and trained facility representative must review the manifest prior to signing it to ensure all information is correct. Contact the DOL warehouse if any questions or concerns should arise.
- c. FEC or other designated and trained facility representative will sign manifest block 16 as the generator. The driver will sign block 17 as Transporter 1 of manifest.
- d. Contractor will provide copies six, seven and eight of the manifest. Copy seven is to be sent to the Minnesota Pollution Control Agency at the address at the top of the manifest. Copy six is to be sent to another states regulating agency if the waste is shipped to that state. Copy eight is to be kept by the generator.
- e. When using a Minnesota manifest, the Treatment, Storage and Disposal Facility (TSDF) will return copy three, with completed block 20, usually within one week. If copy three is not received within 35 days, notify MNAG-FMO-E at (612) 632-7566. **Copies three and eight should be stapled together and filed in the Brown Tab 6 plastic sleeve labeled- Facility Manifests.** Copies three and eight will be kept as permanent records. When using other states manifests refer to Brown Tab 6 for additional directions specific to that state.
- f. Instructions for preparation of the manifest are printed on the back of the manifest and further directions are provided as follows:
  - Block 1:** Generators US EPA Identification Number (see Figure 4-4). Manifest document number will commence with number one and run consecutively for each calendar year (i.e. 1st shipment number 001, 2nd shipment number 002, etc.).
  - Block 2:** Page designation for number of documents of shipment.

**Block 3:** Unit/organization/OMS/activity accomplishing the shipment. (Name and address of generator.)

**Block 4:** Generating facilities phone number.

**Block 5:** Transporter 1 company name, list DOL warehouse if they are transporter.

**Block 6:** Transporter 1 EPA ID number, use figure 4-4 if DOL warehouse is transporter.

**Block 7:** Transporter 2 company name.

**Block 8:** Transporter 2 EPA ID#.

**Block 9:** Vendors address.

**Block 10:** Vendors EPA ID#.

**Shaded Column - Letter H:** (218) 723-7453 (Phone number for DRMO Environmental Specialist)

**Block 11:** Entire contents of column 2 Table 8-1 for the waste.

**Block 12:** Containers Number and Type - Found on the cover sheet of the manifest. Example: 001/CF (one [1] fiber box)

**Block 13:** Total Quantity is the total weight, to include container and waste. If there is no way of weighing the container, leave blank and weigh the item at DOL Warehouse. (This has to be accurate.)

**Block 14:** Unit Wt/Vol. is always "P" for pounds (see cover sheet).

**Block 15:** Blank if there are not any special handling instructions.

**Block 16:** Generator's Certification should be signed (and read) by the FEC or ECO.

**Block 17:** Should be the same as #5.

**Item A:** Pre-printed state manifest number.

**Item B-G: Not required under state laws, However** transporters are required to register with the Minnesota DOT (Mn/DOT). Enter transporters ID number issued by Mn/DOT.

**Item I:** Waste No. is found on Table 8-1 of this regulation or use MPCA Rules Parts 7045.0131-7045.0137. Contact the DOL warehouse for further information.

**Item J and K are not required under State Law.**

- g. Hazardous Waste Manifests are obtained only from the DOL and given out only to generator by request. When filling out the manifest, first photocopy it to make a work copy, and fill out as much as possible. If in doubt, fax the work copy to DOL-Warehouse at (612) 632-7488, Attention: DOL Warehouse Materials Examiner and Identifier. Remember to make sure a return fax number is listed for the return of the copy or corrected copy. Manifests must be typed with no errors. Also, do not remove manifest cover sheets..
- h. If Proper Shipping Name (PSN) has the letters "N.O.S." (not otherwise specified), you must list the hazardous ingredient after N.O.S.. Table 8-1 will list all ingredients that are required to be listed, For example the following information is for contaminated antifreeze that is to be sent directly to a TSD facility from the VSQG facility: **Hazardous Waste Liquid N.O.S., (Ethylene Glycol), 9 NA 3082 PG III ERG #31.**
- i. Make sure that the manifest is signed and dated in blocks #16 and #17 before relinquishing control.

**CHAPTER 9****HAZARDOUS WASTE MANAGEMENT PERSONNEL TRAINING****9-1 REQUIREMENTS**

- a. MNARNG employees have to be trained in the areas of hazardous waste management they are responsible for, and with facility emergency procedures.
- b. Annual training is required for every employee that handles hazardous waste, has any hazardous waste management responsibilities or those employees that would respond to a hazardous waste emergency (fire, spills, etc.). Attendance at MNARNG training sessions is mandatory for personnel on duty appointment or performing hazardous waste management duties as the Facility Environmental Coordinator (FEC). Training must also include the M-day soldier that performs hazardous waste activities at the facility as the Environmental Compliance Officer (ECO). The level of training required can be obtained by:
  - (1) MNARNG FMO-E hazardous waste management training carried out periodically throughout the year (contact FMO-E).
  - (2) Training performed by the generating facility itself. On-the-job training is to be performed by a trained trainer (Facility Environmental Coordinator (FEC) or other duty appointment) before individuals are allowed to work unsupervised.
  - (3) Video (VCR), 10½ Steps to Compliance, and tapes, such as MNARNG Hazardous Waste Management, and numerous other tapes, are available through FMO-E. Other DOL training such as ALMAC College.
  - (4) Minnesota Pollution Control Agency (MPCA) Hazardous Waste Generator Training performed throughout the year by MPCA.
  - (5) Personnel with facilities in the metro counties may contact their county environmental staff to determine if the county provides the required training.
  - (6) Training must be accomplished annually.

**9-2 CONTENT OF TRAINING**

- a. Hazardous Waste Training is not the same as Employee Right-To-Know training. Right-To-Know training addresses the hazardous material handling; Hazardous Waste Training addresses hazardous waste management.
- b. MNARNG employees must receive training on how to perform the hazardous waste management activity they are responsible to perform. It will include the following topic areas and activities:
  - (1) Regulations governing generation, storage and transport of hazardous wastes.
  - (2) Procedures for identifying, handling, packaging, labeling, accumulating and the storage of hazardous and special wastes. This will include the preparation of shipping papers for wastes that are going to the DOL Warehouse, the preparation of manifests for wastes that are going directly to a TSD facility, and preparation of other forms required to properly manage wastes.
  - (3) Procedures for personal protection in handling of hazardous wastes and in responding to spills.

- (4) Simulated hazardous wastes spills. The exercise will demonstrate the required emergency actions and equipment use to contain, clean up and report the spill.

### 9-3 TRAINING RECORDS (Form 200-3-0901) (See Figure 9-1)

- a. Each MNARNG generator must ensure and **DOCUMENT** that all employees are thoroughly familiar with their responsibilities during normal operations and emergencies. These responsibilities include **PROPER WASTE HANDLING, RECORD KEEPING, EMERGENCY PROCEDURES AND RELEVANT TRAINING**.
- b. Document:
  - (1) Employee's name and job title.
  - (2) Job description (including duties related to hazardous waste handling).
  - (3) Dates of training.
  - (4) Content of training course (outlines or a written description).
- c. Proper Waste Handling:
  - (1) Proper choice of containers.
  - (2) Proper labeling.
  - (3) Proper container handling.
  - (4) Complying with accumulation rules; storage time limits, aisle space, and storing containers closed.
  - (5) Documenting weekly inspections of containers and storage area.
  - (6) Preparing containers for shipment (DOT requirements).
  - (7) Preparing shipping papers and manifests.
- d. Emergency Procedures:
  - (1) Fire response: evaluate, notify, extinguish or evacuate.
  - (2) Spill response: evaluate, notify, contain, cleanup, or evacuate.
  - (3) If a chemical creates a particularly hazardous situation during a fire or spill, make sure you train employees in the proper response procedures for that specific chemical.
- e. Training relevant to responsibilities:
  - (1) Train the personnel who perform the hazardous waste management task, and train who might respond to an emergency.
  - (2) Training options are listed in section 9-1. Training records of employees with hazardous waste responsibilities will be kept in the facility hazardous waste compliance records. (Brown Tab 3). A copy of these records will be sent to MNAG-PER-Z or NA4G-SPMO, whichever is appropriate. These records are kept permanently. If the facility closes, records are archived at FMO-E.

**FORM MNGR 200-3-0901**  
**RECORD OF EMPLOYEE HAZARDOUS WASTE MANAGEMENT TRAINING**

EMPLOYEE NAME \_\_\_\_\_ JOB TITLE \_\_\_\_\_

JOB DESCRIPTION (with respect to hazardous waste duties) \_\_\_\_\_

DATE APPOINTED TO THESE DUTIES \_\_\_\_\_

-

**INTRODUCTORY TRAINING**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

**Check areas covered:**

- |   |   |
|---|---|
| <input type="checkbox"/> Using manifests<br><input type="checkbox"/> Contingency Plans<br><input type="checkbox"/> Use of alarms/communications<br><input type="checkbox"/> Use and repair of waste handling<br><br><input type="checkbox"/> Response to spills and groundwater contamination<br><input type="checkbox"/> Labeling containers, tanks<br><input type="checkbox"/> Accumulation of hazardous waste<br><input type="checkbox"/> Waste Evaluation | <input type="checkbox"/> Use of Shipping pape<br><input type="checkbox"/> Recordkeeping<br><input type="checkbox"/> Managing containers and tanks<br><input type="checkbox"/> Response to fires, explosions and monitoring equipment<br><input type="checkbox"/> Inspections<br><input type="checkbox"/> Storage of hazardous waste<br><input type="checkbox"/> Other _____ |
|---|---|

**SECOND TRAINING SESSION**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

Review of First Training  
 Additional Training (describe) \_\_\_\_\_  
 \_\_\_\_\_

**THIRD TRAINING SESSION**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

Review of First Training

\_\_\_ Additional Training (describe)

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**CHAPTER 10****EMERGENCY PLANNING AND PROCEDURES****10-1 PREPAREDNESS AND PREVENTION (Use MNGR 200-21)**

- a. Operation of facility. All facilities will be maintained and operated to minimize the possibility of fire, explosion, or any unplanned release of any regulated material into the environment. All facilities must follow the “Integrated Spill Management” requirements in MNGR 200-21 (Army). This Chapter will briefly summarize some of the MNGR 200-21 requirements.
- b. Required equipment. All facilities will be equipped to manage and contain emergencies that may arise. The following equipment must be maintained at all MNARNG hazardous waste generating sites:
  - (1) An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel. Visual or voice contact between personnel is allowed.
  - (2) A device (i.e. telephone or two-way radio) which is immediately available at the scene of operations, and is capable of summoning emergency assistance from local police and fire departments.
  - (3) Portable fire extinguishers spill control equipment and decontamination equipment.
  - (4) Water at adequate volume and pressure to supply water hose streams, automatic sprinklers or water spray systems.
  - (5) A sink or shower for employees to rinse off any contamination.

**10-2 EMERGENCY PROCEDURES**

- a. Initial Response Action.
  - (1) If any release to the environment occurs, responsive actions will be taken to:
    - (a) Stop the flow.
    - (b) Report the spill to the Emergency Response Coordinator.
    - (c) Contain the spill.
  - (2) In certain situations it may be more prudent to contain the spill prior to giving notification, but this is a judgmental decision. Leaks and minor spills, which are contained and cleaned up by the first person on the scene or the person who caused the spill, must be reported so that appropriate action can be taken to correct the deficiencies or malfunctions which caused the discharge.
  - (3) With minor spills where contaminants do not reach the environment (soil, water, air), and are immediately cleaned up, notification is not required; however, make note of the event (i.e. time and date) as well as what procedures personnel changed to assure it doesn't re-occur, and what personnel did to manage material cleaned up.
  - (4) This information will be placed in MNGR 200-21.
- b. Notification.
  - (1) If any release to the environment occurs, the FEC or designee will notify:
    - (a) All potentially affected personnel.
    - (b) Appropriate state or local agencies as designated in MNGR 200-21. These would include fire, police, environmental regulatory or medical personnel.
  - (2) Telephone report will be followed within 24 hours by the written Spill Report form, MNGR 200-21-11, found in the MNGR 200-21.

**CHAPTER 11****COMPLIANCE RECORDS AND REQUIRED REPORTING****11-1 FACILITY HAZARDOUS WASTE COMPLIANCE RECORDS**

Compliance records are specific to your facility. Each Brown Tab, which requires that records be maintained, will have a labeled plastic sleeve document holder for that purpose.

**Brown Tabs 1 through 13- Compliance Documentation****Brown Tab 1 - Hazardous Substance Inventory (Form MNGR 200-3-1101)**

- a. Each MNARNG facility will complete and maintain an inventory of all hazardous substances and materials present at their facility.
- b. This record will list all hazardous materials used at the facility.
- c. An up-to-date copy must be maintained in **Brown Tab 1 plastic sleeve labeled-Hazardous Substance Inventory**.
- d. An updated copy must be forwarded to FMO-E whenever changes occur in use or type of hazardous materials stored on site.
- e. Updated copy forwarded to FMO-E for their records by 1 January for previous calendar year.

**Brown Tab 2 - Hazardous Waste Record (Form MNGR 200-3-0803)****Wastes Requiring Special Handling (Form MNGR 200-3-0804)**

- a. A Hazardous Waste Record will be submitted to the FMO-E by 1 January of each year for the preceding calendar year.
- b. Maintain a copy of the Hazardous Waste Record in Brown Tab 2. The assigned facility environmental coordinator (FEC) or facility commander must sign this record. This information is used in completing required disclosures and reports for your facility to regulatory agencies.
- c. Any change in the types of waste generated or amounts must be reflected on this report.
- d. Note if a waste stream is a one-time shipment rather than generated annually.
- e. It is required to notify the FMO-E of a new waste stream prior to shipment of the waste. The FMO-E will disclose this information to the proper regulatory authority.

**Brown Tab 3 - Record of Employee Hazardous Waste Management Training  
(Form MNGR 200-3-0901)**

- a. Training records must exist for every MNARNG employee that has hazardous waste management responsibilities at facility.
- b. Send a copy of training records to MNAG-PER-Z or MNAG-SPMO, as appropriate.
- c. Employee training must be updated annually and recorded on form MNGR 200-3-0901.
- d. Maintain copies of all up-to-date records in the Brown Tab 3.

**Brown Tab 4 - Facility Spill Contingency Plan (FSCP)****(MNGR 200-21, not included in the Tab)**

- a. All generators of hazardous waste are required to complete emergency planning and response requirements. Complying with MNGR 200-21 meets these requirements.
- b. These requirements include the following documentation:
  - (1) Cover Sheet.
  - (2) Response to Hazardous Materials Emergencies.
  - (3) Required Emergency Equipment.
    - (a) Copy of Alarm Inspection - AGO Form 385-2.
    - (b) Copy of Fire Extinguisher Record - AGO Form 385-3.
    - (c) Copy of Emergency Lighting Inspection Record - AGO Form 385-1.
  - (4) Site Diagram/Plot Plan.
  - (5) Hazardous Waste Information Sheet.
  - (6) Notifications to Local Emergency Response Personnel.
- c. The plan is reviewed annually or revised as needed. Document revision and review dates. Maintain copies of all documentation in MNGR 200-21.

**Brown Tab 5 - Hazardous Waste Manifest Document Register (Form MNGR 200-3-0702)****Only OMS's shipping parts cleaning solvent will need to utilize this form.**

- a. An up-to-date copy of the Hazardous Waste Manifest Document Register is to be maintained in the **Brown Tab 5 plastic sleeve labeled-Documents Register**.
- b. A copy of the document register for the preceding calendar year will be forwarded to FMO-E by 1 January of each year.

**Brown Tab 6 - Copies of Facility Manifests****(For OMS's only)**

- a. A copy of each manifest releasing a hazardous waste to a transporter must be maintained in the **Brown Tab 6 plastic sleeve labeled-Manifests**.
- b. The signed copies must be retained as a permanent record.

**Brown Tab 7 - Shipping Papers (Form MNGR 200-3-0704 or DA Form 2765-1)**

- a. Maintain copies of all shipping documents in the **Brown Tab 7 plastic sleeve labeled-Shipping Paper**.
- b. Maintain copies of any other documents used as records of hazardous or solid waste transactions.

**Brown Tab 8 - Waste Streams**

- a. Analyses (waste test results).
- b. Evaluations
- c. Hazardous Waste Profile Sheets.
- d. Material Safety Data Sheets (MSDS).
- e. Maintain copies of all waste stream classification documentation in the **Brown Tab 8 plastic sleeve labeled-Analytical results, MSDS, Vendor Information**.

**Brown Tab 9 - Used Oil Documentation and Management of Waste Lamps (Turn-in)**

- a. Copies of used oil receipts or other turn-in documents must be maintained in the **Brown Tab 9 plastic sleeve labeled-Used Oil**.
- b. Copies of documents used for Fluorescent, Mercury Vapor or High-Intensity Discharge Lamps turn-in to the Solid Waste Transfer Station (Area 24), must be maintained in the **Brown Tab 9 plastic sleeve labeled-Fluorescent Bulbs**.

**Brown Tab 10 - Used Oil Filters/Spent Fuel Filters and Lead Acid Battery Documentation**

- a. Copies of contract vendor receipts for the pickup of used oil filter, fuel filters and lead acid batteries must be maintained in the **Brown Tab 10 plastic sleeve labeled-Used Oil and Fuel Filters**.

**Brown Tab 11 - Hazardous Waste Log (Form MNGR 200-3-0502)**

- a. Use this form to document waste mixtures.
- b. Attach a copy to turn-in documents for waste turned in to the DOL Warehouse. Maintain a copy in the **Brown Tab 11 plastic sleeve labeled-Weekly Inspection log**.

**Weekly Storage Inspection Log (Form MNGR 200-3-0601)**

- a. This form must be maintained at all hazardous waste storage locations and accumulation sites.
- b. Place completed form in the **Brown Tab 11 plastic sleeve labeled-Weekly Inspection log**.

**Brown Tab 12 - Management of Waste-by-Sewering Documentation**

- a. Copies of notifications and sewer analytical reports should be placed in **Brown Tab 12 plastic sleeve labeled-Sewering Documentation**.

**Brown Tab 13 - Past Hazardous Waste Generator Licenses**

- a. The current MPCA generator license must be posted at the facility. File past license documents in **Brown Tab 13 plastic sleeve labeled-Past Hazardous Waste Licenses**.

**CHAPTER 12****REFERENCES**

The references listed below are the documents that were utilized in the preparation of this regulation. MNARNG generators are not required to maintain copies of these documents at their facilities.

**Statutes:**

Comprehensive Environmental Response, Compensation, and Liability Act, Public Law 96-510, 42 USC 9601 et seq., 1980, as amended.

Minnesota Statutes 116 subds 4, 4b Hazardous Waste.

Minnesota Statutes 116.12 Facility and Generator Fees

Resource Conservation and Recovery Act, Public Law 94-580, 42 USC 6901 et. seq., Subtitle C, 1976, as amended.

Toxic Substances Control Act, 15 USC 2605, 2607, and 2611.

**Regulations:**

Army Regulation 420-47, Solid and Hazardous Waste Management.

Army Regulation 200-1, Environmental Protection and Enhancement.

Code of Federal Regulations, Chapter 40, Subchapter I, Solid Wastes, Parts 260-271.

Code of Federal Regulations, Chapter 40, part 261, Polychlorinated Biphenyls (PCB's).

Code of Federal Regulations, Chapter 40, Subpart M, National Emission Standard for Asbestos.

Code of Federal Regulations, Chapter 49, Subchapter C, Hazardous Materials Regulations, Parts 171-179.

Minnesota Hazardous Waste Rules, Chapter 7045.

Minnesota Facility and Generator Fees Rules, Chapter 7046.

Hazardous Waste Management Ordinances for the Metropolitan Counties of Hennepin, Ramsey, Dakota, Washington and Anoka.

**Other References:**

Environmental Considerations in the DPDS Disposal Process, DPDS-M 6050.1, Defense Property Disposal Service, 1985.

The references listed below are environmental and related documents required to be maintained at all MNARNG facilities.

Minnesota Army National Guard Regulation Number 200-1  
Environmental Protection and Enhancement

Minnesota Army National Guard Regulation Number 200-2  
Environmental Review of MNARNG Actions

Minnesota Army National Guard Regulation Number 200-3  
Hazardous and Special Waste Management

Minnesota Army National Guard Regulation Number 200-4  
Infectious Waste Management and Bloodborne Pathogens Standard

Minnesota Army National Guard Regulation Number 385-10  
Command Safety Program

Minnesota Army National Guard Regulation Number 200-21  
Integrated Spill Management

**CHAPTER 13****EXPLANATION OF TERMS AND ABBREVIATIONS**

**AASF** - Army Aviation Support Facility

**Accumulation Start Date** - The date that a container of waste is full. For **Satellite accumulation** it is the date waste is first placed in the container.

**Acid** – A corrosive material that is acidic. An acid with a pH less than or equal to 2 is a hazardous waste.

**Acute Hazardous Waste** - Dangerous wastes designated in Minnesota Rules 7045.0135 as acute hazardous wastes. These may be accumulated for no longer than 90 days after 2.2 lbs. have been generated.

**Caustic** - A corrosive material that is alkaline as opposed to acid. A caustic material with a pH greater than 12.5 is a hazardous waste.

**CFR** - Code of Federal Regulations

**Combustible Liquid** - Any liquid with a flash point at or above 140°F (45.8°C) and below 200°F (93.3°C).

**Corrosive Material** - A liquid or solid that causes visible destruction or irreversible alterations to human skin tissue at the site of contact, or in the case of leakage from its packaging, a liquid that has a severe corrosion rate on steel.

**CRC** - Camp Ripley Commander

**DOD** - Department of Defense

**Degreaser** - Any agent that will dissolve, emulsify, or otherwise remove grease or oil.

**Disposal Facility** - A permitted facility for final disposal of hazardous wastes.

**DOL** – Director of Logistics Warehouse

**DOT** - Department of Transportation

**DRMO** - Defense Reutilization and Marketing Office

**Environmental Compliance Officer (ECO)** - M-day position with unit waste management responsibilities.

**ES** - Environmental Specialist in the Army Guard Facilities Engineering Office

**EPA** - US Environmental Protection Agency

**Flammable Liquid** - A liquid having a flash point below 140°F.

**Flash Point** – The temperature that vapors forming over a liquid will ignite.

**FMO** - Army Guard Facilities Management Officer

**Facility** - Any MNARNG site, to include all buildings, grounds, and activities thereon.

**Facility Environmental Coordinator (FEC)** - Fulltime position with facility waste management Responsibilities.

**Facility Spill Control Plan (FSCP)** - Specific plan (MNGR 200-21) for responding to spills of hazardous materials, hazardous wastes, POL, etc., required by Minnesota Rules.

**FMO-E** - Facilities Management Office, Environmental Section

**FMO-M** - Facilities Management Office, Materials Management Section

**Generator** – Any facility that produces hazardous waste.

**Generator Identification Number** - Number assigned by EPA and MPCA to a facility that generates hazardous waste.

**Hazardous Material (HM)**- Any liquid, solid, or gas, capable of posing a risk to health, safety, or property.

**Hazardous Waste (HW)** - Any used or discarded material subject to Minnesota State Hazardous Waste Regulations (Chapter 7045) or Federal Hazardous Waste Regulations (40 CFR, parts 260-271).

**HWM Plan** - Hazardous Waste Management Plan

**IAW** - In accordance with

**Installation Spill Contingency Plan (ISCP)** - Specific plan for responding to spills of hazardous materials, hazardous wastes, POL, etc., for installations like TACC's and OMS's.

**Label** - The documents applied to the outside of a container showing a descriptive name, nature of the material, caution statements, etc. Requirements are explained in Chapter 5-7.

**MANIFEST** - The shipping document prepared in accordance with the requirements of Minnesota Rules 7045.0216 and 7045.0265, which are used to identify the quantity, composition, origin, routing, and destination of a hazardous waste while it is being transported to a point of transfer, disposal, treatment, or storage. Requirements are explained in Chapter 7-3.

**MNARNG** - Minnesota Army National Guard

**MNGR** - Minnesota National Guard Regulation

**MPCA** - Minnesota Pollution Control Agency

**MSDS** - Material Safety Data Sheet

**MUTF** - Medical Unit Training Facility

**NPDES** - National Pollutant Discharge Elimination System

**NSN** - National Stock Number

**OHN** - Occupational Health Nurse

**Overpack/Salvage Drum** - A container that is used to provide protection of a smaller container or to consolidate two or more containers that are damaged and will not stand transport alone. Requirements are explained in Chapter 5-6.

**PCB** - Polychlorinated Biphenyls

**Placard** - The exterior marking on a transport vehicle as required by 49CFR172.

**POP** - Performance Orientated Packaging. This is a UN requirement for all packaging, original and replacement, that standardizes the quality of packaging.

**PPD** - Physical Plant Director, an FMO division

**PPM** - Parts Per Million

**RCRA** - Resource Conservation and Recovery Act (Federal).

**Shipping Paper**- A document that can be used in place of a manifest for the shipping of hazardous wastes. VSQG's can use shipping papers to transport their waste to the DOL Warehouse or to MNARNG recycling facilities (used oil, antifreeze, bulbs etc.). See Chapter 7-2.

**Solvent** - An agent, usually petroleum-based, used to dissolve or thin greases or oils.

**SQG** - Small Quantity Generator. A generator of hazardous waste that amounts to less than 1,000 kilograms per month.

**SSMO** - State Surface Maintenance Office

**SSO** - State Safety Officer

**Storage Facility** - A permitted facility for holding of hazardous waste for a long term period. Example: DRMO, Duluth.

**TAG** - The Adjutant General

**TCLP** - Toxicity Characteristic Leaching Procedure

**Toxic** - Having the properties to cause or to significantly contribute to death, injury, or illness of man or wildlife. Also a term used to designate hazardous wastes in accordance with Minnesota Rules 7045.0131.

**Transfer Facility** - A permitted facility for temporary storage of hazardous waste prior to recycling, treatment or disposal. The DOL warehouse is the MNARNG transfer facility. MPCA rules require that waste remain no more than 10 days at the DOL warehouse transfer facility before it is transported to a TSD facility.

**Transporter** - A person engaged in the off-site transportation of hazardous wastes. Must be authorized to transport and have valid EPA/State Identification Number and Minnesota License.

**Treatment Facility** - A permitted facility for treating hazardous waste.

**TSDF** - Transfer, Storage, Disposal Facility

**USC** - US Code - Code of Federal Laws

**USPFO** - United States Property and Fiscal Officer

**VSQG** - Very Small Quantity Generator. A generator of hazardous waste that amounts to less than 100 kilograms per month.

**VSQG Collection Program Site**- A permitted facility for the collection of waste from VSQG facilities.  
The DOL Warehouse is a permitted MNARNG VSQG Collection site.

**CHAPTER 14**

**VOID**

**Chapter 14 will not be used for the VSQG Regulation.**

**CHAPTER 15****MNANG - HAZARDOUS WASTE GENERATOR COMPLIANCE CHECKLIST  
SELF EVALUATION****15-1 Document Utilization**

The following document (Fig. 15-1) are to be utilized by Facility Environmental Coordinators, Environmental Compliance Officers or Facility Commanders to help assure facility compliance. They are most often used as an internal checklist as hazardous waste activities are reviewed. Contact the FMO-E Environmental Specialist at (320) 632-7566 for help in determining how often these inspections should be done and who should be doing the inspections. Complete checklist once per year to review facility compliance status. Checklist is self explanatory. If you have any questions contact the FMO-E Environmental Specialist at (320) 632-7566 (x7565).

**15-2 Document Maintenance**

The completed document must be placed in plastic sleeve provided in this Chapter. A copy of the completed checklist must be sent to the FMO-E.

## **BASIC REQUIREMENTS**

### **1. Current hazardous waste generators license for facility**

**MN Rules 7045.0225, Subpt. 2; MNGR (army) 200-3, 2.3, Brown Tab 13**

- a.) Anyone who generates hazardous waste must obtain a hazardous waste generator license for each individual generation site.
- b.) Generator must prominently display the hazardous waste generator license in a public area at the license site.
- c.) Copies of past years facility licenses must be maintained in the **Brown Tab 13 plastic sleeve labeled-Old Hazardous Waste Licenses.**

### **REVIEWER'S COMMENTS:**

### **2. EPA Identification Numbers**

**MN Rules 7045.0221; MNGR (Army) 200-3, 4.6, Table 4-4**

- a.) Prior to generation, transportation, treatment, storage or disposal of any hazardous waste, the facility must obtain a generator identification number describing the activities performed.

### **REVIEWER'S COMMENTS:**

### **3. Evaluation of Wastes**

**MN Rules 7045.0214, .0215; MNGR (Army) 200-3, 2.4, Brown Tab 8**

- a.) Any person who produces a waste within the State of Minnesota must evaluate the waste to determine if it is hazardous.
- b.) Copies of evaluation data must be maintained in an organized fashion in the **Brown tab 8 plastic sleeve labeled-Analytical results, MSDS and vendor information.**
- c.) Waste evaluation must be of the individual waste prior to any mingling or combining with other wastes. If wastes are mingled, it requires a evaluation again.
- d.) Obtaining MSDS and HMIS information on product must be performed at the time of purchase or through MNAG-SOHM. Hazardous Waste Profiles or test results are obtained through FMO-E.

### **REVIEWER'S COMMENTS:**

### **4. Disclosures of Hazardous Waste Generated/Charges**

**MN Rules 7045.0240, .0248; (Army) 200-3, 4.4, Brown Tab 2**

- a.) Generator must disclose waste stream information within 75 days of first producing a hazardous waste.

- b.) A generator who does not have a generator license or who fails to submit disclosures timely shall immediately stop generating the hazardous waste, or discontinue the process generating the waste.
- c.) Generators must submit completed form MNGR 200-3-0803 annually, or at any time that practices generating hazardous waste changes, or the volume or type of waste produced in that year changes.
- d.) Records of facility's disclosures must be maintained indefinitely in the **Brown Tab 2 plastic sleeve labeled-Waste Record.**

**REVIEWER'S COMMENTS:**

**5. Undisclosed Waste**

**MN Rule 7045.0240; MNGR (Army) 200-3, 4.4**

- a.) Any hazardous waste stream being generated, stored or shipped must be disclosed on the facility's license.

**REVIEWER'S COMMENTS:**

**6. Waste Water Treatment Operations Notification and Reports**

**Metro County Ordinance; MNGR (Army) 200-3, 8.5.11, Brown Tab 12**

- a.) Many waste streams can be managed by sewerage. Notification of waste entering sanitary system is responsibilities of generator. Generator must place a copy of and sewerage notification or analytical result in the **Brown Tab 12 plastic sleeve labeled-Sewerage Documentation.**

**REVIEWER'S COMMENTS:**

**7. Record Retention**

**MN rules 7045.0294; MNGR (Army) 200-3, 11.1, Brown Tab Sections**

- a.) A generator must keep a copy of all hazardous waste management documentation (disclosures, manifests, reports, test results, training records, shipping papers, storage inspection records) at the licensed site, easily available and organized for review. MN rules states this paperwork must be kept for three years. MNARNG regulation states records are kept and maintained forever at the facility.

**REVIEWER'S COMMENTS:**

**8, 9. Feed Stock/By Products**  
**MN Rules 7045.0125**

- a.) Hazardous wastes that are shown to be recycled are not subject to all of the hazardous waste regulations. Hazardous wastes are considered to be used as feedstock if they are: used as an ingredient, an effective substitute, or returned to original process from which they are generated.

**REVIEWER'S COMMENTS:****SHIPMENTS****10. Proper Manifest**

**MN Rules 7045.0261, S.5, 7045.0075, S.5; MNGR (Army) 200-3, 7.3 and 8-5.16**

- a.) A generator who transports or offers waste to be transported must prepare a manifest before transporting the waste off-site. Place a copy of the manifest in the **Brown Tab 6 plastic sleeve labeled-Facility manifests**.

**REVIEWER'S COMMENTS:****11. Copies Available of Manifests**

**MN Rules 7045.0261, S.9, 7045.0294, S.1; MN**

- a.) The manifest must consist of at least the number of copies which will provide the generator, each transporter, and the owner or operator of the designated facility with one copy each for their records, another copy to be returned to the generator by the facility, as well as State. Copies of this paperwork must be kept forever in **Brown Tab 6 plastic sleeve labeled-Facility manifests** .

**REVIEWER'S COMMENTS:****12. Manifests Properly Completed**

**MN Rules 7045.0261, S.7; MNGR (Army) 200-3, 7-3 and 8-5.16, Brown Tab 6**

- a.) Manifests must be typed correctly as specified by Department of Transportation, Environmental Protection Agency, Minnesota Pollution Control Agency and the MNARNG. No errors should be accepted on manifest and no corrections visible. If a mistake is made, start a new document.

**REVIEWER'S COMMENTS:**

**13. Send Initial Copy to MPCA****MN Rule 7045.0265, S.1; MNGR (Army) 200-3, 7-3c., Brown Tab 6**

- a.) The generator must send within five working days of the initial transporters acceptance of the hazardous waste shipments.

**REVIEWER'S COMMENTS:****14. Send Final Copy to MPCA****MN Rule 7045.0265, S.4; MNGR (Army) 200-3, 7-3c., Brown Tab 6**

- a.) When shipment of hazardous waste is to be delivered to a hazardous waste facility, a copy of the hazardous waste manifest must be signed by the facility operator and returned to the state regulatory agency as well as the generator within 40 days of its acceptance.

**REVIEWER'S COMMENTS:****15. 45 Day Exception Reporting****MN Rules 7045.0298, MNGR (Army) 200-3, 7-3 and 8-5.16**

- a.) A generator who does not receive a copy from the storage or disposal facility within 35 days of the date the waste was accepted by the initial transporter must document that they have contacted the transporter, storage, and disposal facility to determine the status of the hazardous waste. The generator must submit an exception report to the regulatory authority if a copy of the manifest has not been received within 45 days of the date the waste was accepted by the initial transporter.

**REVIEWER'S COMMENTS:****16. Land Disposal Restrictions (LDR)****MN Rule 7045.1300; MNGR (Army) 200-3, Brown Tab 6**

- a.) VSQG's aren't required to use LDR forms; however, if the contract vendor provides the form then use it. To assist in assuring hazardous waste is not land filled, a Land Disposal Restriction Generator Notice and Certification shall be completed and attached to all documents required by hazardous waste shipments. A copy of the completed LDR forms must be maintained in the facility environmental compliance binder.

**REVIEWER'S COMMENTS:**

**17. Shipping Papers****MN Rules 7045; MN GR (Army) 200-3, 7-2 and 8-3**

- a.) When shipping hazardous materials or hazardous waste streams such as lead acid batteries or fluorescent bulbs, manifests are not necessarily required, but Shipping Papers are. A copy must be maintained of all Shipping Papers in the **Brown Tab 7 plastic sleeve labeled-Shipping Papers.**

**REVIEWER'S COMMENTS:****ACCUMULATION****18. 180 Day/270 Day Exceeded 200 Mile Transportation****MN Rule 7045.0292; MN GR (Army) 200-3, 6-3**

- a.) Generators may not store hazardous waste longer than 180 days from when the first waste starts to accumulate. VSQG facilities may accumulate up to 1000 kilograms (2,200 lbs.) of waste at which time they have 180 days to ship the waste to a TSD facility. The MNARNG's policy is to turn-in all waste at the time the container holding waste becomes full.

**REVIEWER'S COMMENTS:****19. Satellite Accumulation****MN Rules 7045.0292, S.8; MN GR (Army) 200-3, 6-4**

- a.) This provision is to allow for shipment of full containers when collecting slow accumulating waste streams. Containers in a satellite location will be marked as follows.
- (1) Hazardous Waste
  - (2) Description that clearly identifies its contents
  - (3) Satellite Accumulation
  - (4) Satellite Accumulation Start Date
  - (5) Fill Date (Fill date signifies the start of the 180-day storage time limit for disposal).
  - (6) Move Date, container must be moved to hazardous waste storage area within 3 days.

**REVIEWER'S COMMENTS:****20. Spent Lead-Acid Battery Storage****MN Rules 7045.0685; MN GR (Army) 200-3, 8.5.13**

- a.) Storage of spent lead acid batteries shall be on an impermeable, curbed surface, and provisions shall be made to recontainerize leaking or broken batteries, with regular inspections to assure the integrity of the stored batteries.

**REVIEWER'S COMMENTS:**

**21. Pre-Transport Requirements****MN Rules 7045.0270, MNGR (Army) 200-3, 5-7**

- a.) Before transporting or offering hazardous waste for transport offsite, a generator must:
- (1) Have containers holding waste labeled and marked.
  - (2) Prepare turn-in documents (Form 2765, manifests, shipping papers, test results, material safety data sheets) so all are available.
  - (3) Package material to assure integrity of containers is not breached as specified by DOT, DOL Warehouse and DRMO.
  - (4) Before transporting hazardous waste or offering hazardous for transporting off-site, a generator must placard or offer the initial transporter placard.
  - (5) Generator who transports hazardous waste must assure waste is transferred to pertinent DOT restriction including the separation of incompatible wastes and securing the load.
  - (6) Generator must ensure that all drivers have completed form MNGR 200-3-0705 prior to transporting hazardous waste.

**REVIEWER'S COMMENTS:****CONTAINERS****23. Weekly Container Inspection****MN Rules 7045.0626, S.5; MNGR (Army) 200-3, 6.1.d, Brown Tab 11**

- a.) Generating facility shall inspect hazardous waste containers and areas where containers are stored, at least weekly. Looking for leaks and for deterioration caused by corrosion or other factors, including marking, labeling, closed containers; and shall keep a written record of the dates and findings of these inspections. Place completed copies of the inspection form in the **Brown Tab 11 plastic sleeve labeled-Weekly Inspection Log.**

**REVIEWER'S COMMENTS:****24. Containers in Good Condition****MN Rules 7045.0626, S.2; MNGR (Army) 200-3, 5-3**

- a.) Containers used to store hazardous waste must meet the following requirements:
- (1) Be of sturdy, leak proof construction, adequate wall thickness, adequate weld, hinge, and seam strength and sufficient strength to withstand side and bottom shock, while filled, without impairment of the ability of the container to fully contain the hazardous waste.
  - (2) Have lids, caps, hinges, or other closure devices of sufficient strength and construction so that when closed they will withstand dropping, overturning, or other shock without impairment of the container's ability to fully contain the hazardous waste.

**REVIEWER'S COMMENTS:**

**25. Closed Containers:**

**MN Rules 7045.0626, S.4; MNGR (Army) 200-3, 5.3, 6.1.a**

- a.) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

**REVIEWER'S COMMENTS:**

**26. Hazardous Waste Marking**

**MN Rules 7045.0292, S.5H/.6H; MNGR (Army) 200-3, 5.7**

- a.) All hazardous waste containers and tanks are labeled with the words "Hazardous Waste".

**REVIEWER'S COMMENTS:**

**27. Descriptive Name**

**MN Rules 7045.0292, S.5H; MNGR (Army) 200-3, 5.7, Table 8-1**

- a.) All hazardous waste containers and tanks labeled with a description (descriptive name) that clearly identifies their contents to employees and emergency personnel.

**REVIEWER'S COMMENTS:**

**28. Containers Compatible with Wastes**

**MN rules 7045.0292, S.3; MNGR (Army) 200-3, 5.4.a.**

- a.) The owner or operator shall use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored and other substances that the container may foreseeable contact, so that the ability of the contain the waste is not impaired.

**REVIEWER'S COMMENTS:**

**29. Proper Ignitable/Reactive Management**

**MN Rules 7045.0626, S.7**

- a.) Containers holding ignitable or reactive wastes must be located at least 50 feet from the facility property line or area of public access.

**REVIEWER'S COMMENTS:**

**30. Incompatible Wastes Separated****MN Rules 7045.0626, S.6; MNGR (Army) 200-3, 6.1.e., Figure 7-1**

- a.) Incompatible wastes or incompatible wastes and materials must not be placed in the same containers. Hazardous waste must not be placed in an unwashed container that previously held an incompatible waste or material. A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device. The purpose of this requirement is to prevent fires, explosions, gaseous emissions, and leaching or other discharge of hazardous waste or hazardous waste constituents that could result from the mixing of incompatible wastes or materials if containers break or leak.

**REVIEWER'S COMMENTS:****31. Closure****MN Rules 7045.0626, S.8**

- a.) At closure, all hazardous waste and hazardous waste residues must be removed from the storage area. Remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed. At closure and throughout the operating period, unless the owner or operator can demonstrate that the waste removed from the storage area is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and shall manage it in accordance with all applicable requirements.

**REVIEWER'S COMMENTS:****32. Household Battery Regulations Storage****MN Rules 7045.0686, S.3; MNGR (Army) 200-3, 8-3.b, 8.5.2**

- a.) Spent or waste batteries are Special/Universal wastes but must be stored according with hazardous waste regulations:
- (1) Storage of spent or waste household batteries shall be in vented corrosion resistant containers.
  - (2) Storage of containers of spent or waste household batteries shall be subject to the requirements of hazardous waste.

**REVIEWER'S COMMENTS:**

## **OUTDOOR CONTAINERS**

### **33. Liquids – Curbed Impermeable Surface**

**MN Rules 7045.0292, S.1.f.; MNGR (Army) 200-3, 6-2.b**

- a.) Containers that hold free liquids are placed on a containment surface that is impermeable to the wastes stored and, if outside, curbing is required. If indoors, it may be optional if a liquid can be captured and managed in some other fashion.

#### **REVIEWER'S COMMENTS:**

### **34. Ignitable Wastes – Shaded**

**MN Rules 7045.0292, S.1.g.; MNGR (Army) 200-3, 6.2.c.**

- a.) Containers holding hazardous waste which exhibit the characteristics of ignitability or reactivity, or which exhibit the potential for creating vapor pressures capable of causing containers to leak, deform or otherwise fail if not shaded, are to be shaded from direct sunlight.

#### **REVIEWER'S COMMENTS:**

### **35. Containers Protected from Moisture/Entry/Damage**

**MN Rules 7045.0626, S.4; 7045.0292, S.1.e.; MNGR (Army) 200-3, 6.2.a**

- a.) Outdoor storage areas are protected from unauthorized access and inadvertent damage from vehicle or equipment.
- b.) Containers that if exposed to moisture or direct sunlight may create a hazardous condition or adversely affect the containers ability to contain the hazardous waste, are to be stored in an area with overhead roofing or other converting that does not obstruct the visibility of the labels.

#### **REVIEWER'S COMMENTS:**

## **TANK RULES**

### **36. Daily Inspections/Level Monitor and Discharge Equipment**

#### **MN Rules 7045.0629, S.3 (A-C)**

- a.) Generators regulated under this part must inspect, where present:
- (1) Discharge control equipment, such as waste feed cutoff systems, bypass systems, and drainage system, at least once each operating day, to ensure that it is in good working order.
  - (2) Data gathered from monitoring equipment such as pressure and temperature gauges, at least once each operating day, to ensure that the tank is being operated according to its design.

#### **REVIEWER'S COMMENTS:**

### **37. Weekly Inspection – Leaks and Corrosion**

#### **MN Rules 7045.0629, S.3.d. & e.**

Generators regulated under this part must inspect:

- a.) The construction materials of the tank at least weekly to detect corrosion or leaking of fixture or seams; and the construction materials of, and the area immediately surrounding, discharge confinement structures such as dikes, at least weekly to detect erosion or obvious signs of leakage such as wet spots or dead vegetation.

#### **REVIEWER'S COMMENTS:**

### **38. Pretreatment Inspection Schedule**

#### **MN Rules 7045.0655, S.3.**

Generators regulated under this part must perform the following:

- a.) The owner or operator shall inspect the elementary neutralization unit, pretreatment unit, wastewater treatment unit, or combustion waste facility for malfunctions and deterioration, operator errors, and discharges which may be causing or may lead to unauthorized release of hazardous waste to the environment or a threat to human health. The owner or operator shall conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment.
- b.) The owner or operator shall develop and follow a written schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices, and operation and structural equipment, such as tank walls and pumps, that are important to prevention of environmental or human health hazards. The owner or operator shall keep this schedule at the facility. The schedule must identify the types of problems, such as malfunctions, or deterioration, which are to be looked for during the inspection, such as inoperative pumps, leaking fittings or heavy corrosion.
- c.) The frequency of inspection may vary for the items on the schedule. It should be based on the rate of possible deterioration of the equipment and the probability of an environmental or human health incident if any deterioration or malfunction or operator error goes undetected between inspections.

- d.) The owner or operator shall remedy any deterioration or malfunction of equipment or structures detected in an inspection. This must be done on a schedule, which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action must be taken immediately.
- e.) The owner or operator shall record inspections in an inspection log and shall keep these records for at least three years from the date of inspection. These records must include the date and time of each inspection, the name of the inspector, a recording of the observations made, and the date and nature of any repairs or other remedial actions taken as a result of inspection observations.

**REVIEWER'S COMMENTS:**

**39. Accumulation Start Date Record**

**MN Rules 7045.0292, S.1c.**

- a.) Generators regulated under this part will assure tanks and containers are clearly labeled with the waste accumulation start date; alternatively, containers are so labeled while a clearly designated and legible log of tank transactions which included accumulation start dates is maintained; all of these dates must be available for inspections.

**REVIEWER'S COMMENTS:**

**40. Hazardous Waste Marking Seen from Valves**

**MN rules 7045.0270, S.3.**

- a.) Any generator or other person who maintains a storage tank containing hazardous waste shall display the words "Hazardous Waste" on the storage tank in a legible and conspicuous manner. The words "Hazardous Waste" shall be plainly visible and legible to any person who may operate any outlet valve.

**REVIEWER'S COMMENTS:**

**41. Compatible with Waste**

**MN Rules 7045.0629, S.2.b**

- a.) Hazardous wastes or treatment reagents must not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or otherwise fail.

**REVIEWER'S COMMENTS:**

**42. Proper Ignitable/Reactive Management****MN Rules 7045.0562, S.2. and 7045.0629, S.5.**

Generators regulated under this part must comply with the following special requirements for ignitable or reactive waste:

- a.) Ignitable or reactive waste must not be placed in a tank, unless the waste is treated, rendered, or fixed before or immediately after placement in a tank so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste.
- b.) The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react, or the tank is used solely for emergencies.
- c.) The owner or operator of a facility which treats or stores ignitable or reactive waste in covered tanks must comply with the buffer zone requirements for tanks contained in Tables 2-1 to 2-6 of the most current edition of the National Fire Protection Association's Flammable and Combustible Liquids Code.

**REVIEWER'S COMMENTS:****43. Uncovered Tanks have 60 Centimeters, two Feet of Freeboard or Controls****MN Rules 7045.0629, S.2.c**

- a.) Uncovered tanks must be operated to ensure at least 60 centimeters of freeboard, unless the tank is equipped with a containment structure such as a dike or trench, a drainage control system, or a diversion structure such as a standby tank with a capacity that equals or exceeds the volume of the top 60 centimeters of the tank.

**REVIEWER'S COMMENTS:****44. Continuous System Shut-Off****MN Rules 7045.0629, S.2.d.**

- a.) Where hazardous waste is continuously fed into a tank, the tank must be equipped with a means to stop this inflow such as a waste feed cutoff systems to a standby tank.

**REVIEWER'S COMMENTS:****45. Closure****MN Rules 7045.0629, S.4**

- a.) Generators regulated under this part must, upon closure of the facility, remove all hazardous waste from tanks, discharge control equipment, and discharge confinement structures.

**REVIEWER'S COMMENTS:**

**PROPER WASTE MANAGEMENT****46. Relinquishing Control****MN Rules 7045.0208, S.2; MNGR (Army) 200-3, 4.7**

A generator must not relinquish control of a hazardous waste if:

- a.) The generator has reason to believe that the hazardous waste will not be properly managed; or
- b.) The transporter or the treatment, storage, or disposal facility is not exempt under this chapter, and has not:
  - (1) Received an identification number from a state with a hazardous waste program authorized by the Environmental Protection Agency pursuant to Code of Federal regulations, title 40, part 271; or
  - (2) Received an identification number from the Environmental Protection Agency.

**REVIEWER'S COMMENTS:****47. Report/Recover Spills****MN rules 7045.0275, S. 2-3; MNGR (Army) 200-3, 4.8; MNGR 200-21**

- a.) Any person in control of a hazardous waste that spills, leaks, or otherwise escapes from a container, tank, or other containment system, including its associated piping, shall immediately notify the agency if the hazardous waste may cause pollution of the air, land resources, or waters of the state. The person shall contact the Emergency Duty Officer 24-hour telephone number: (800) 422-0798 Facility managers must review MNGR 200-21 to view specific protocol for accomplishing this task in time of emergency.
- b.) Any person who generates a hazardous waste that spills, shall recover the hazardous waste as rapidly and as thoroughly as possible and shall immediately take other action as may be reasonable or possible to protect human life and health and minimize or abate pollution of the water, air, or land resources of the state.

**REVIEWER'S COMMENTS:****48. Management of Used Oil****MN Rules 7045.0125, S.3.a.; MNGR (Army) 200-3, 8.5.11, Brown Tab 9**

- a.) Used oil that is recycled in some other way than being burned for energy recovery is not subject to all the hazardous waste rules. Oil that is not recycled or mixed with hazardous waste is subject to all hazardous waste rules. Place copies of all used oil documentation in the **Brown Tab 9 plastic sleeve labeled-Used Oil.**

**REVIEWER'S COMMENTS:**

**49. Operate to Prevent Release****MN Rules 7045.0566, S.2.; MNGR (Army) 200-21**

- a.) Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release to air, land, or water of hazardous waste or hazardous waste constituents, which could threaten human health or the environment.

**REVIEWER'S COMMENTS:****50. Adequate Aisle Space****MN Rules 7045.0566, S.6.; MNGR (Army) 200-3, 6.1.b**

- a.) The owner or operator shall maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spills control equipment, and decontamination equipment to any area of facility operation in an emergency unless it can be demonstrated to the commissioner that aisle space is not needed for any of these purposes.

**REVIEWER'S COMMENTS:****51. Internal/External Communications****MN Rules 7045.0566, S.3. (A,B); MNGR (Army) 200-21.**

- a.) All facilities must be equipped with the following, unless it can be demonstrated to the commissioner that none of the hazards posed by waste handled at the facility could require the particular equipment specified below:
- (1) An internal communications or alarm system capable of providing immediate emergency instruction to facility personnel.
  - (2) A device, such as a telephone or a hand-held two-way radio, which is immediately available at the scene of operations and which is capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

**REVIEWER'S COMMENTS:****52. Communication in Waste Area****MN Rules 7045.0566, S.5.; MNGR (Army) 200-21**

- a.) Whenever hazardous waste is being poured, mixed, spread, or otherwise handled, all personnel involved in the operation shall have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless the commissioner has ruled that such a device is not required.

- b.) If at any time only one employee is on the premises while the facility is operating, that employee shall have immediate access to a device, such as a telephone or a hand-held, two-way radio, which is immediately available at the scene of operation and which is capable of summoning external emergency assistance unless the commissioner has ruled that such a device is not required.

**REVIEWER'S COMMENTS:**

**53. Emergency/Spill/Fire**

**MN Rules 7045.0566, S.3. (C,D); MNGR (Army) 200-21**

- a.) Generator facilities equipped with the following, unless it can be demonstrated to the commissioner that none of the hazards posed by waste handled at the facility, could require the particular equipment specified: portable fire extinguishers, spill control equipment, decontamination equipment, and fire control equipment, including special extinguishing devices such as those using foam, inert gas, or dry chemicals, and water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

**REVIEWER'S COMMENTS:**

**54. Equipment Tested/Maintained**

**MN Rules 7045.0566, S.4.; MNGR (Army) 200-21**

- a.) All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to ensure proper operation in time of emergency.

**REVIEWER'S COMMENTS:**

**LOCAL AUTHORITY ARRANGEMENTS**

**55. Police/Fire/Hospital**

**MN Rules 7045.0568, S.1.a.; MNGR (Army) 200-21,**

- a.) The owner or operator shall attempt to make the following arrangements, as appropriate for the type of waste handled at the facility and the potential need for the services with police/fire/hospital.

**REVIEWER'S COMMENTS:**

**56. Layout/Waste/Work Area****MN Rules 7045.0568, S.1.a., MNGR (Army) 200-21**

- a.) Generators must make arrangements to familiarize the police, fire departments, and emergency response teams with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, and places where facility personnel would normally be working.

**REVIEWER'S COMMENTS:****57. Entrance/Evacuations Routes****MN Rules 7045.0568, S.1.a.; MNGR (Army) 200-21**

- a.) Generators must make arrangements to familiarize the police, fire departments and emergency responders, the entrance to and roads inside the facility, and evacuation routes.

**REVIEWER'S COMMENTS:****58. Document Refusal****MN Rules 7045.0568, S.2.; MNGR (Army) 200-21**

- a.) If state or local authorities decline to enter into arrangements as described, the generator shall document the refusal in the operating record.

**REVIEWER'S COMMENTS:****59. Generator Size****MN Rules 7045.0206, MNGR (Army) 200-3, 4.5****Applicability.** This part applies to all generators for purposed of determining generator size.**Large Quantity Generator:** A generator is a large quantity generator if, in a calendar month, waste is generated in any of the following quantities:

- a.) Greater than or equal to 1,000 kilograms of hazardous waste, excluding acute hazardous waste;
- b.) Greater than one kilogram of acute hazardous waste; or
- c.) Greater than 100 kilograms of any residue or contaminated soil, water, or other debris resulting from the clean-up of a spill, into or on any land or water, of any acute hazardous waste.

**Small Quantity Generator:** A generator is a small quantity generator if, in a calendar month, waste is generated in all of the following quantities:

- a.) Greater than 100 kilograms and less than 1,000 kilograms of hazardous waste, excluding acute hazardous waste;

- b.) Less than or equal to one kilogram of acute hazardous waste; and
- c.) Less than or equal to 100 kilograms of any residue or contaminated soil, water, or other debris resulting from the clean-up of a spill, into or on any land or water, or any acute hazardous waste.

**Very Small Quantity Generator:** A generator is a small quantity generator if, in a calendar month, waste is generated in all of the following quantities:

- a.) Less than or equal to 100 kilograms of hazardous waste, excluding acute hazardous waste;
- b.) Less than or equal to one kilogram of acute hazardous waste; and
- c.) Less than or equal to 100 kilograms of any residue of contaminated soil, water, or other debris resulting from the clean-up of a spill, into or on any land or water, of any acute hazardous waste.

**Waste Exempt from Size Determination:** A generator shall not include the following waste when determining the quantity of hazardous waste generated:

- a.) Recycled waste as a feedstock or by-product.
- b.) Used oil managed as follows:
  - (1) Used oil that is recycled in some other manner than being burned for energy recovery.
  - (2) Used oil that is to be burned for energy recovery.
- c.) Sewered hazardous waste that is pretreated.
- d.) For mixtures of non-hazardous waste and hazardous waste, waste that is non-hazardous provided that the volume of the hazardous waste before mixing is counted.
- e.) Spent materials that are generated, reclaimed, and subsequently reused on-site, provided that the spent materials have been counted once.
- f.) **Special/Universal Wastes.** See **MNGR (Army) 200-3, 8-3.b**

**Change in Generator Size Status:** If a small quantity generator exceeds the quantity limits listed, the generator loses small quantity generator status and is subject to all the generator requirements. If a very small quantity generator exceeds the quantity limits listed, the generator loses very small quantity generator status and is subject to the small quantity generator requirements.

- a.) Once generator size status is lost, the generator shall not regain that status until the commissioner modifies the generator in writing that the original generator size status has been approved. The commissioner shall only approve generator size status under this item if the generator can demonstrate to the satisfaction of the commissioner that the waste quantities that will be generated in the future will meet the limits established. The generator shall make this demonstration by submitting a written statement to the commissioner to evaluate the request. The information shall include an explanation of the circumstances that resulted in each instance of over generation during the past year, an explanation of the measures that the generator has taken to correct the cause of over-generation, and other information as necessary to document that the over-generation will not reoccur.
- b.) For small quantity generators, if the quantity of hazardous waste generated in any calendar month exceeds the quantities listed and the cause of the over-generation is a spill or accidental release of hazardous waste that is not acute hazardous waste, the shutdown or clean-up of some part of the generation process, or the replacement of PCB containing equipment, the generator loses small quantity generator status and is subject to all the generator requirements. However, in any of these cases, a generator will automatically regain small quantity generator status without applying to the commissioner for approval if the generator:

- (1) Resumes generation within the quantity limits.
  - (2) Complies with the quantity limits during the other 11 months of the calendar year.  
A generator who cannot automatically regain small quantity generator status may apply for reclassification.
- c.) For very small quantity generators, if the quantity of hazardous waste generated in any calendar month exceeds the quantities listed For VSQG's but does not exceed the quantity listed for SQG's, the generator loses very small quantity generator status and is subject to the small quantity generator requirements of this chapter. However, a generator shall automatically regain very small quantity generator status without applying to the commissioner for approval if the generator:
- (1) Resumes generation within the quantity limits for VSQG's.
  - (2) Complies with the VSQG quantity limits during the other 11 months of the calendar year.  
A generator who cannot automatically regain very small quantity generator status under this subpart may apply for reclassification under item a) above.  
A very small quantity generator who generates hazardous waste in any calendar month exceeding the quantities listed for SQG's is subject to a) and b) above..

**REVIEWER'S COMMENTS:**

**60. Emergency Coordinators**

**MN Rules 7045.0292, S.5.j. (1) and 7045.0468, S.1.; MN GR (Army) 200-21**

- a.) At all times, there must be at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facilities contingency plan, all operations and activities at the facility, the locations and characteristics of waste handled, the location of all records within the facility, and the facility layout. The person shall also have the authority to commit the resources needed to carry out the contingency plan. Applicable responsibilities for the emergency coordinator vary, depending on factors such as type and variety of waste handled by the facility and type and complexity of the facility.

**REVIEWER'S COMMENTS:**

**61. Emergency Coordinator's Name and Phone**

**MN Rules 7045.0292, S.5j. (2) and 7045.0466, S.4.d.; MN GR (Army) 200-21**

- a.) An up-to-date list of names, addresses, and office and home telephone numbers of all persons qualified to act as emergency coordinator. If more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. For new facilities, this information

must be supplied to the commissioner at the time certification rather than at the time of permit application.

- b.) The generator must post the following information next to the telephone on the premises: the name and telephone number of the emergency coordinator.

**REVIEWER'S COMMENTS:**

**62. Fire/Spill Equipment Location**

**MN Rules 7045.0292, S.5.j. (2) and 7045.0466, S.4.c.; MNGR (Army) 200-21 and 200-3**

- a.) The generator must post the following information next to the telephones on the premises: the location of fire extinguishers and spill control material, the fire alarm, if present, and the telephone numbers of the fire department, unless there is a direct alarm.

**REVIEWER'S COMMENTS:**

**63. Fire Department Number**

**MN Rules 7045.0292, S.5.j. (2), S.4.c.; MNGR (Army) 200-3**

- a.) The generator must post the following information next to the telephones on the premises: the telephone number of the fire department, unless there is a direct alarm.

**REVIEWER'S COMMENTS:**

**64. Emergency Response**

**MN Rules 7045.0292, S.5.j. (4); MNGR (Army) 200-21**

- a.) The emergency coordinator or a designee must respond to any emergencies that arise. Appropriate responses include: in the event of a fire, call the fire department or try to extinguish the fire by using a fire extinguisher; in the event of a spill, contain the flow of hazardous waste to the extent possible and so soon as practicable, clean up the hazardous waste and any contaminated materials or soils; in the event of a fire, explosion, or other release that could threaten human health outside the premises or when the generator has knowledge that a spill has reached surface water, the generator must immediately notify the Minnesota Duty Officer using its 24-hour toll free number 1-800-422-0798 and provide the name, addresses, identification number of the generator, fate, time, type of incident, and the estimated quantity and disposition of any recovered materials.

**REVIEWER'S COMMENTS:**

**65. Employee Training Documented**

**MN Rules 7045.0292, S.5.j. (3); MNGR (Army) 200-3, 9.2, 9.3, Brown Tab 3**

- a.) The generator must ensure and document that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies. Place copies of all training documentation in the **Brown Tab 3 plastic sleeve labeled-Training Records.**

**REVIEWER'S COMMENTS:**

**66. Waste Minimization**

**Executive Order 91-77; MNGR (Army) 200-3, 2.2**

- a.) Generators must maintain practices that minimize the generation of hazardous waste.

**REVIEWER'S COMMENTS:**

**67. Safety Equipment**

- a.) Generators must have appropriate safety equipment for materials handled, and emergencies addressed.

**REVIEWER'S COMMENTS:**

<b>HAZARDOUS SUBSTANCE INVENTORY</b>
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1. Each hazardous waste generator will complete and maintain a hazardous substance-physical agent inventory (Form MNGR 200-3-1101).
2. This record will list all hazardous materials used at the facility.
3. An up-to-date copy must be maintained in the facility waste compliance records.
4. An updated copy must be forwarded to FMO-E whenever changes occur in use or type of hazardous materials stored on site.
5. An updated copy forwarded to FMO-E for their records by 1 January for the previous calendar year.
6. Facilities may substitute AGO Form 385-4, Hazardous Substance Chemical Agent Inventory.

**HAZARDOUS SUBSTANCE INVENTORY**

Facility Name \_\_\_\_\_ Work Location \_\_\_\_\_ Contact Person \_\_\_\_\_  
Telephone \_\_\_\_\_ Date \_\_\_\_\_

Manufacturers Name	Address	Chemical Name	Trade Name	How is it used	NSN Number	Number of Containers	Size of Container

<p style="text-align: center;"><b>HAZARDOUS WASTE RECORD/WASTES REQUIRING SPECIAL HANDLING</b> (FORMS MNGR 200-3-0803 and MNGR 200-3-0804)</p>
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1. All generators of hazardous waste must maintain up-to-date disclosures with various regulatory agencies. Disclosures must inform these agencies how wastes are managed.
  - (a) In the seven county metro area, disclosures are provided to County Hazardous Waste Staff.
  - (b) For greater Minnesota, disclosures are provided to the MPCA.
2. MNARNG generators must prepare a Hazardous Waste Record, Figure 8-3 (Form MNGR 200-3-0803) and Wastes Requiring Special Handling Form, Figure 8-4 (Form MNGR 200-3-0804) for submittal to FMO-E.
3. FMO-E will submit disclosures to regulators for all MNARNG generators.
4. FMO-E requires the information on the completed forms to assist them in completing the disclosure process for these regulatory agencies.
5. MNARNG generators are required to complete forms and submit them to FMO-E for the preceding calendar year by 1 January of each year.

**Form MNGR 200-3-0803  
HAZARDOUS WASTE RECORD**

<b>HAZARDOUS WASTE RECORD</b>	<b>FACILITY NAME:</b> _____ _____ <b>EPA ID NUMBER:</b> _____			<b>EMERGENCY COORDINATOR:</b> _____ (Name) <b>TELEPHONE NUMBER:</b> _____		
DESCRIPTION OF WASTE	NSN -OR- LSN	EPA HAZARDOUS WASTE NUMBER	QUANTITY GENERATED IN CALENDAR YEAR 20____	QUANTITY ON SITE 31 DEC 20____	UNIT OF MEASURE	UN/NA CODE

**I certify that this is a true and accurate record of hazardous wastes generated at this facility.**

\_\_\_\_\_

April 2001

VSQG Regulation

MNGR 200-3  
(Army)

**Signature of Responsible Official**

**Date**



<b>HAZARDOUS WASTE MANAGEMENT TRAINING</b>
--

1. MNARNG employees have to be trained so that they are familiar with waste handling procedures and facility emergency procedures.
2. The "Record of Employee Hazardous Waste Management Training" will document compliance with this requirement.
3. The introductory course description lists some areas of hazardous waste management.
4. At least one person in your organization should be familiar with the specific requirements in each area and should know how they apply.
5. You should also note:
  - a. Training is required only for those employees that handle hazardous waste, or those employees that would respond to a hazardous waste emergency (i.e. fire, spill, etc.).
  - b. Training need only cover those areas for which the specific employee has responsibility.
  - c. Training must be reviewed annually to assure employees are kept familiar with the duties they are required to perform.
6. Fill out one form for each employee that is trained.
  - a. Fill in the employee's name, title and date the employee was appointed to their duties.
  - b. Write in the date the employee first receives training, who gave the training, and check the areas/topics covered in the training.
  - c. Be sure to have the employee certify the training by signing the form.
  - d. Subsequent training must be verified in the same manner.
- 7) Forward copy of employee's up-to-date training documentation to MNAG-PER-Z or MNAG-SPMO.

**FORM MNGR 200-3-0901**  
**RECORD OF EMPLOYEE HAZARDOUS WASTE MANAGEMENT TRAINING**

EMPLOYEE NAME \_\_\_\_\_ JOB TITLE \_\_\_\_\_

JOB DESCRIPTION (with respect to hazardous waste duties) \_\_\_\_\_

DATE APPOINTED TO THESE DUTIES \_\_\_\_\_

-

**INTRODUCTORY TRAINING**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

**Check areas covered:**

- |  |  |
|--|--|
| <input type="checkbox"/> Using manifests<br><input type="checkbox"/> Contingency Plan<br><input type="checkbox"/> Use of alarms/communications<br><input type="checkbox"/> Use and repair of waste handling<br><br><input type="checkbox"/> Response to spills and groundwater contamination<br><input type="checkbox"/> Labeling containers, tanks<br><input type="checkbox"/> Accumulation of hazardous waste<br><input type="checkbox"/> Waste Evaluation | <input type="checkbox"/> Use of Shipping papers<br><input type="checkbox"/> Recordkeeping<br><input type="checkbox"/> Managing containers and tanks<br><input type="checkbox"/> Reponse to fires, explosions and monitoring equipment<br><input type="checkbox"/> Inspections<br><input type="checkbox"/> Storage of hazardous waste<br><input type="checkbox"/> Other _____ |
|--|--|

**SECOND TRAINING SESSION**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

Review of First Training  
 Additional Training (describe) \_\_\_\_\_  
 \_\_\_\_\_

**THIRD TRAINING SESSION**

Date \_\_\_\_\_ Instructor Signature \_\_\_\_\_

Employee Signature \_\_\_\_\_

Review of First Training

\_\_\_ Additional Training (describe)

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<p style="text-align: center;"><b>FACILITY SPILL MANAGEMENT PLAN</b> <b>(FORM MNGR 200-21)</b></p>
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All personnel involved in the production, containerization and shipping of hazardous materials must use the MNGR 200-21 "Integrated Spill Management" in the event of an accidental release of a hazardous material.

<b>HAZARDOUS WASTE DOCUMENT REGISTER</b> <b>(FORM MNGR 200-3-0702)</b>
---

1. A record of all hazardous waste shipped off-site will be maintained and recorded on the Hazardous Waste Document Register.

An up-to-date copy is to be maintained in the facility hazardous waste compliance records.

2. A copy of the document register for the preceding calendar year will be forwarded to the FMO-E by 1 January of each year.
3. To complete the Hazardous Waste Document Register, obtain the following information from the Uniform Hazardous Waste Manifest prepared for shipments of hazardous waste from the MNARNG generating facility:

(The following information only references Minnesota's Hazardous Waste Manifest. Reference information may vary if another State's manifest is used.)

- (a) The date: The date is obtained by recording the date that the manifest is prepared by the generator and signed at Block 16 of the Uniform Manifest.
- (b) State Manifest Document Number: This unique number specific only to the document prepared by the generator is located in Block A in the upper right hand corner of the Uniform Manifest.
- (c) Transporter's Name: This information is located in Blocks 17 and 18 of the Uniform Manifest.
- (d) Hazardous Material (HM): If a generator is knowledgeable of waste in its previous virgin condition, note on document register if it was a hazardous material or not before use. This information may also be obtained in Block 11 of the Uniform Hazardous Waste Manifest. A yes or no in this block will be sufficient in denoting this information.
- (e) US DOT Description: The proper DOT shipping name for waste being shipped is located in Block 11 of the manifest.
- (f) Container Number & Type: Obtain this information from Block 12 of the manifest.
- (g) Total Quantity: Obtain this information from Block 13 of the Uniform Manifest.
- (h) Waste Number: This information is obtained from Block I of the manifest. It is a four digit EPA code number specific to the waste transported and disposed.

**FORM 200-3-0702  
HAZARDOUS WASTE DOCUMENT REGISTER**

**GENERATOR NAME:** \_\_\_\_\_

**FACILITY EPA ID #:** \_\_\_\_\_

**YEAR:** \_\_\_\_\_

DATE	MANIFEST # or TYPE OF SHIPPING PAPER USED	TRANSPORTER NAME	HM	DOT PROPER SHIPPING NAME (COLUMN 2 of TABLE 8-1)	CONTAINER		TOTAL QUANTITY	EPA WASTE ID #
					NO.	TYPE		

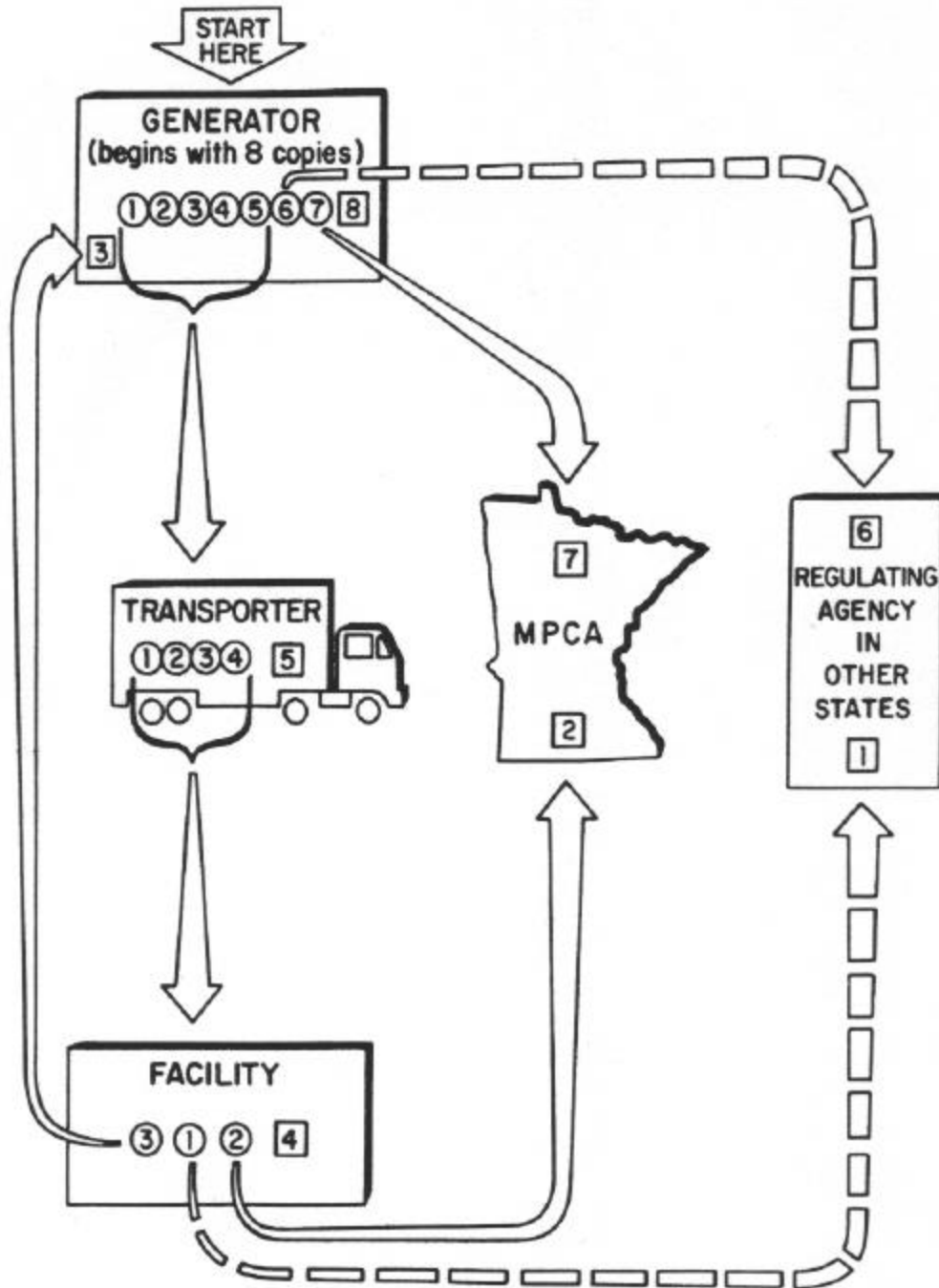
**Call the DOL Warehouse Materials Examiner and Identifier at (320) 632-7488 or DSN #871-7488, FMO-E at (320) 632-7566 or Utilize Table 8-1 in MNGR 200-3 to fill out this register.**

<b>MANIFESTING HAZARDOUS WASTES</b>
-------------------------------------

1. A "manifest" and a "LDR" forms are shipping papers. The manifest must accompany all off-site shipments of hazardous waste; however the LDR form is not required for VSQG facilities.
2. MNARNG or a "generator who transports or offers for transportation hazardous waste for off-site treatment, storage or disposal must prepare a manifest before transporting the waste off-site."
3. Any person or company producing a hazardous waste must manifest whenever shipping hazardous waste off-site either for disposal.
4. Only one manifest needs to accompany each shipment of hazardous waste. MNARNG generators must use either the Minnesota manifest or another state's manifest if the hazardous waste is transported to a TSD facility out of state.
5. The MNARNG, as a generator of hazardous waste, is considered forever responsible for the proper handling and disposal of that waste. The MNARNG is responsible for the waste from the time and place the waste is produced ("the cradle") through the time and even after the time it is delivered to the final treatment, storage or disposal site ("the grave").
6. Manifesting provides the MNARNG (and regulatory agency) with a means of keeping track of the waste after it leaves the production site. This "tracking" of hazardous waste is for the MNARNG's protection and to ensure that no hazardous waste is mishandled or mismanaged. This avoids endangering human health or the environment.
7. When using a Minnesota manifest, MNARNG generators are required to do the following:
  - a. Tear off and give copies one through five of the manifest to the transporter.
  - b. Send copy seven within five days of shipment to the regulatory agency in the state where the final disposal facility is located. The facility location will be noted in Box 9 of the Uniform Hazardous Waste Manifest.
  - c. For Minnesota, send copy seven within five days of shipment to the MPCA, Solid and Hazardous Waste Division, 520 Lafayette Road North, St. Paul, MN 55155, Attention: HWIMS.
  - d. Retain copy eight of each manifest forever.
  - e. Copy three will be returned to you by the designated facility receiving the waste. If you have not received copy three of the manifest signed by the storage or disposal facility owner/operator within 35 days of shipment, then you must notify FMO-E and check on the status of your waste shipment.
  - f. MNARNG must send MPCA an "exception report" regarding this manifest. **This must be done within 45 days of the original shipment.**
  - g. Pair copies three and eight for the shipment and place in a chronological order in facility hazardous waste compliance records.

8. Shipping waste to Wisconsin using their manifest:
  - a. Tear off and give copies three through six to the hauler.
  - b. Send copy one to the Wisconsin DNR, Bureau of Solid Waste Management.
  - c. Retain copy two.
  - d. Send a photocopy of copy two to the MPCA, Attention: HWIMS.
  - e. Expect copy five to be returned by the facility.
  - f. Photocopy copy five and send it to the MPCA, Attention: HWIMS.
  - g. Pair copies two and five for the shipment and place in a chronological order in facilities hazardous waste compliance records.
  
9. Shipping waste to Illinois:
  - a. Tear off and give copies one through four to the hauler.
  - b. Send copy five to the Illinois EPA.
  - c. Retain copy six.
  - d. Send a photocopy of copy six to the MPCA, Attention: HWIMS.
  - e. Expect to receive copy one from the facility.
  - f. Make a photocopy of copy one and send it to the MPCA, Attention: HWIMS.
  
10. Regardless of which manifest is used, the MPCA **must** receive a copy of the manifest within five days of the shipment and another copy that has been signed by the facility owner/operator.

**DISTRIBUTION OF MINNESOTA'S UNIFORM  
HAZARDOUS WASTE MANIFEST  
BY MINNESOTA ARMY NATIONAL GUARD GENERATORS**



<b>HAZARDOUS MATERIAL AND HAZARDOUS WASTE SHIPPING PAPERS</b>
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1. The MNARNG VSQG's preferred shipping paper for hazardous materials is DA Form 2765-1. Instructions on how to properly fill out the DA Form 2765-1 can be found in Chapter 8.
2. The VSQG's that offer for transport, or are transporting hazardous wastes themselves, as well as many special waste streams, have the option to utilize the DA Form 2765-1 or MNGR-200-3-0704. Instructions on how to properly fill out MNGR 200-3-0704 are provided in Chapter 8.
3. If information is not available about the specific material you are transporting, contact FMO-Environmental Specialist or the DOL warehouse Materials Examiner and Identifier for assistance.
4. **Place copies of shipping papers in "Facility Hazardous Waste Shipping Records" file sleeve included in this tab. Keep only the current calendar year in the Tab 7 file sleeve. Place older copies into an archive "Facility Hazardous Waste Shipping Records" file that must be maintained in the FEC's or facility commanders office. Both the MNGR 200-3 and the archive file must be maintained in the same room. Place all records chronologically so that they can be easily accessed for review and inspection.**

**FORM MNGR 200-3-0704**  
**MINNESOTA ARMY NATIONAL GUARD**  
**HAZARDOUS MATERIAL/SPECIAL WASTE SHIPPING PAPER**

(1) SHIPPED TO: \_\_\_\_\_

(2) SHIPPED FROM: \_\_\_\_\_

(3) DATE SHIPPED: \_\_\_\_\_

(4) DATE RECEIVED: \_\_\_\_\_

**D.O.T. DESCRIPTION**

(5) Proper Shipping Name \_\_\_\_\_

(6) Hazard Class \_\_\_\_\_

(7) UN/NA Identification Number \_\_\_\_\_

**CONTAINERS**

(8) Number of Containers \_\_\_\_\_

(9) Type of Containers \_\_\_\_\_

**TOTAL QUANTITY**

(10) Weight in Pounds \_\_\_\_\_

(11) Number of Gallons \_\_\_\_\_

**ADDITIONAL DESCRIPTION FOR MATERIAL LISTED ABOVE**

(12) National Stock Number \_\_\_\_\_

(13) Special  
Packaging Instructions \_\_\_\_\_

(14) Emergency Contact \_\_\_\_\_

**SHIPPER'S CERTIFICATION:** "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

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**Shipper's Name**

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**Signature**

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**Date**

Guidelines for filling out the 200-3-0704 Shipping paper, if there is any doubt on filling out the shipping paper then contact the DOL or the FMO-E. **Do Not Guess.**

- (1) Shipped to:
  - (a) Most materials/wastes will be shipped to the DOL Warehouse.
  - (b) Antifreeze that is to be recycled will be shipped to the CSMS or the supporting OMS for your area.
  - (c) Fluorescent bulbs will be shipped to Solid Waste Transfer facility at Camp Ripley.
  - (d) Used oil and filters are to be shipped to one of the sites listed in 8-5.2.
  - (e) Parts cleaning materials will require a manifest (see section 8-5).
  - (f) Used automotive batteries will be picked up at the OMS facility on a vendor-scheduled basis.
  - (g) Used shop rags are to be delivered to the DSU Warehouse.
- (2) Shipped from: Facility name.
- (3) Date shipped: Date shipped.
- (4) Date received: Date the DOL or other entity receives the waste.

#### **DOT DESCRIPTION**

- (5) Proper Shipping Name: See Table 8-1 in the MNGR 200-3.
- (6) Hazard Class: See Table 8-1 in the MNGR 200-3.
- (7) UN/NA Identification Number: See Table 8-1 in the MNGR 200-3.

#### **CONTAINERS**

- (8) Enter the number of containers for the waste listed in #5 above.
- (9) Enter the type of container: See Table 8-1 in the MNGR 200-3.

#### **TOTAL QUANTITY**

- (10) Enter the weight of the container, if known.
- (11) Enter the number of gallons of the waste/material.

#### **ADDITIONAL DESCRIPTION FOR MATERIAL LISTED ABOVE**

- (12) Enter the NSN for the hazardous material that will be shipped.
- (13) Enter the Emergency Response Guide # from Table 8-1 in the MNGR 200-3.
- (14) Enter (320) 632-7488, the phone # of the DOL Warehouse Materials Examiner and Identifier.

#### **SHIPPERS CERTIFICATION**

The designated hazardous waste manager or equivalent must sign and date the shipping paper.

<b>WASTE STREAMS</b>
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- A) Analyses (test results)
  - B) Evaluations
  - C) Hazardous Waste Profile Sheets (DRMO)
  - D) Material Safety Data Sheets (MSDS)
- 
1. It is a requirement to maintain records at all MNARNG facilities that generate hazardous waste.
  2. These records must include any test results, evaluations, hazardous waste profile sheets and material safety data sheets of waste streams produced by your facility.
  3. These records can be obtained from the following sources:
    - a. Analyses (tests) - FMO-E under contract services.
    - b. Hazardous Waste Profile Sheets - FMO-E.
    - c. Material Safety Data Sheets are obtained from supplier at time of purchase, or from FMO-E.

**EVALUATIONS/MSDS's**

1. Material safety data sheets often provide information that can be useful in evaluating a waste to determine if it is hazardous.
2. A material safety data sheet may be all that is needed to evaluate the waste.
3. In other cases, a product becomes a waste simply when, due to use, it no longer works for a given process.
4. For instance, it may have picked up too much oil and dirt to continue to remove grease effectively. In this case, the contaminated waste material has characteristics similar to the original product.
5. In this situation, evaluation of waste from the material safety data sheet should be useful in evaluating the waste.

**GLOSSARY OF TERMS USED ON MATERIAL SAFETY DATA SHEETS**

**Absorption** - The process by which a substance can be readily taken into a body. For example, some chemicals can be absorbed through unbroken skin.

**Acid** - A compound consisting of hydrogen plus one or more other elements and which, in the presence of some solvents or water, reacts to release hydrogen. Acids can be used to neutralize bases. Acids corrode metal and turn litmus paper red.

**Acute** - Severe, usually critical, often dangerous conditions in which relatively rapid changes occur as a result of exposure to high concentrations of material over a short period of time.

**Alkali** - A compound which has the ability to neutralize acid and form a salt. Like bases, alkalis turn litmus paper blue and are corrosive.

**Aqueous** - A water-based solution.

**Ceiling Limit** - The air-borne concentration that is never to be exceeded for any worker exposure.

**Carcinogenic** - Cancer producing.

**Caustic** - Something, which strongly irritates, burns, or destroys living tissue.

**Combustible Liquid** - Any liquid with a flash point above 140°F.

**Concentration** - The amount of a substance in a given amount of air.

**Corrosive** - Any material, liquid, or solid, that causes visible destruction of, or irreversible alterations in, human skin tissues at the site of contact (burns). Examples of corrosive caustics are sodium hydroxide or ammonia solutions.

**Dermal** - Used on or applied to the skin.

**Flashpoint** - The lowest temperature at which a liquid produces sufficient vapor to form an ignitable mixture with the air.

**Incompatible** - Materials that could cause dangerous reactions from direct contact with one another.

**LEL - Lower Explosive Limit** - The lowest concentration of a gas or vapor that will burn or explode if an ignition source is present at ambient temperatures.

**Oxidizer** - A chemical, other than a blasting agent or explosive, that contains oxygen and may start or assist combustion in other materials. Examples are chromic acid, concentrated nitric acid, and potassium permanganate.

**pH** - A symbol used to quantify the level of acidity or alkalinity. Strong acids have a pH near 1, strong bases near 13, and a pH of 7 indicates neutrality.

**Reactivity** - The ability of a material to undergo a reaction with the release of energy or heat.

### **Threshold Limit Value - TLV and PEL**

The Threshold Limit Value (TLV) is a safe exposure level set by the American Conference of Governmental Industrial Hygienists (ACGIH). A Permissible Exposure Limit (PEL), is a similar level set by OSHA. Both refer to airborne concentrations of substances and represent an exposure level under which most people can work constantly for eight hours a day, day after day, with no harmful effects. Three categories of TLV's are specified:

- a. Time Weighted Average (TLV-TWA) - This is the normal time-weighted average concentration for a normal eight hour workday or 40 hour work week, to which all workers may normally be exposed day after day, without adverse effect.
- b. Short-Term Exposure Limit (TLV-STEL) - This is the maximum concentration to which workers can be exposed for a period of up to 15 minutes continuously without suffering from 1) irritation, 2) chronic or irreversible tissue change, or 3) narcosis of sufficient degree to impair self-rescue or reduce work efficiency. No more than four 15-minute exposure periods per day are permitted with at least 60 minutes between those exposure periods.
- c. Ceiling (TLV-C) - The concentration that should not be exceeded even instantaneously.

**Toxicity** - The toxicity of a chemical can be measured using a variety of animal studies. OSHA uses three categories for this:

- a. Oral LD50 - Lethal dose 50% test: the medium lethal dose (LD50) that kills 50% of the albino white rats that received it. Oral LD50 is expressed as milligrams of chemical per kilogram of test animal body weight. A dose of one milligram per kilogram (Mg/Kg) is equal to one millionth of the test animal's body weight. OSHA considers a chemical to be toxic if the oral LD50 is between 50 Mg/KG and 500 Mg/Kg.
- b. Skin LD50 - A dose that kills 50% of the albino white rats that had the chemical applied directly to the bare skin for 24 hours. Skin LD50 is also expressed Mg/Kg . OSHA considers a chemical to be toxic if the skin LD50 is between 200 Mg/Kg and 1000 Mg/Kg.
- c. Inhalation LC50 - Lethal concentration 50% is the concentration of a chemical in the air needed to kill 50% of the albino white rats that breathed it. LC50 is expressed as parts-per-million

(PPM) for bases and vapors. LC50 is also expressed as milligrams per liter (Mg/l) for mists, fumes, and dusts.

<b>USED OIL DOCUMENTATION REQUIREMENTS</b>
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1. The use of a hazardous waste manifest is not required for the transportation of used oil as long as the oil is being recycled.
2. Recycling options for used oil includes re-refining or burning for energy recovery.
3. Used oil records should contain, at a minimum:
  - a. Location of generation.
  - b. Amount of oil transported to OMS, DOL, or collected at site by a contract vendor.
  - c. Dates activities occurred.
  - d. Final destination of used oil for recycling or reuse.
4. DA Form 2765-1 or MNGR 200-3-0704 for turn-in, or receipts from contractor picking up the oil, will most often be sufficient.
5. Used oil includes:
  - a. Vehicle oil.
  - b. Lubrication oil.
  - c. Transmission fluid.
  - d. Hydraulic oil.
  - e. Gear oil.
  - f. Tempering or quenching oils.
  - g. Cutting oil.

<b>MANAGEMENT OF FLUORESCENT LAMPS AT VSQG FACILITIES</b>
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1. The U.S. Environmental Protection Agency's (EPA) implementation of the Toxicity Characteristic Leaching Procedure Test (TCLP) placed many new wastes into the hazardous category, including fluorescent lamps, high intensity discharge lamps, and mercury vapor lamps.
2. Many lamps are hazardous waste. Some, however, are non-hazardous, depending upon the lamp and the manufacturer of the lamp.
3. Materials of concern are mercury and lead, which are heavy metals that can do damage in small amounts.
4. **REQUIRED MANAGEMENT OF LAMPS**
  - a. Mercury escapes into the atmosphere when lamps are broken causing environmental problems when the mercury vapor comes down to the ground and into surface waters exposed to the mercury vapor.
5. **TRANSPORTATION REQUIREMENTS FOR LAMPS**
  - a. Pack lamps in a way to protect them from breaking.
  - b. Use Form MNGR 200-3-0704 when shipping lamps within the State of Minnesota.
  - c. Use a licensed hazardous waste transporter and a manifest when transporting lamps to other states from Minnesota.
6. **STORAGE REQUIREMENTS FOR LAMPS**
  - a. Store in an area and a manner that will prevent breakage.
  - b. Use signs and notices that show employees where and how to store lamps.
  - c. If storage on site is not possible, transport the lamps to a storage location.
7. **RECORD KEEPING**
  - a. Any time bulbs are stored or shipped off-site, records need to be kept. MNARNG facilities must keep track of three things:
    - 1) The number of lamps removed from service during each calendar year.
    - 2) The storage location of the lamps.

- 3) When and where the lamps were shipped.

<b>MANAGING USED OIL AND FUEL FILTERS</b>
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1. In order to recycle filters properly, filters must first be processed to ensure all free-flowing liquid is removed. Fuel filters are not subject to most regulations if they are recycled as scrap metal (7045.0125, subp 4, item O).
2. Typical processing includes draining, followed by crushing. Oil and fuel removed from processed filters must be collected and recycled.
3. Contracted Oil recycling companies will pick up filters from OMS facilities. The OMS's must contact the FMO-E Environmental Specialist at (320) 632-7566 to arrange for pickup.
4. MNARNG facilities generating used oil filters must report to FMO-E. In addition to the initial report, an annual update of filter management information is required by FMO-E.
5. **RECORDING**
  - a. In order to provide accurate information for required annual updates, we recommend that you regularly record the number of used filters you produce and how the used filters were managed.
6. **STORAGE REQUIREMENTS**
  - a. Store used oil and fuel filters in a manner that will ensure that liquid is not dumped or dripping on the ground.
  - b. To prevent oil and fuel leakage and accumulation of rainwater in the filters, store used filters in a closed, leak proof container.

<b>USED/SPENT LEAD ACID BATTERY DOCUMENTATION REQUIREMENTS</b>
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1. Maintain copies of facility shipping papers or turn-in documents (DA Form 2402) utilized in the management of lead acid batteries.
2. Additional spent lead acid battery management requirements are located in Chapter 8, of MNGR 200-3.

<p style="text-align: center;"><b>FORM MNGR 200-3-0601</b> <b>WEEKLY INSPECTION LOG</b></p>
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1. Facility locations where hazardous wastes are being collected and stored are required to be inspected weekly.
2. These inspections must be documented.
3. The Weekly Inspection Log provides this documentation.
4. At the top of the form, fill in the facility name and EPA ID Number.
5. Document who performs the inspections, and the areas inspected.
6. Inspections are nothing more than visual observations of the drums or other containers to make sure that bungs are on and no drums are leaking.
7. Each week fill in the date, inspection performed, note the areas inspected, and initial the entry.
8. If you do find problems, such as a leaking drum, note the condition, and when and how condition is corrected, in the comment area on the form.
9. Keep the inspection log on clipboard in the hazardous waste storage area.
10. **Place completed copies of this log in the “Facility Weekly Inspection Log” file sleeve that is included in this tab. Place all records chronologically so that they can be easily accessed for review and inspection.**

<p style="text-align: center;"><b>FORM MNGR 200-3-0502</b> <b>HAZARDOUS WASTE LOGS</b></p>
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1. Waste deposited in containers must be compatible with the container and the other waste in the container.
2. A log of all waste put into a container will be maintained for each container (see Form MNGR 200-3-0501). The log will be attached to turn-in documents for waste disposal.
3. **Place completed copies of this log in the “Facility Hazardous Waste Log” file sleeve that is included in this tab. Place all records chronologically so that they can be easily accessed for review and inspection.**
4. Additional information regarding the use of a Hazardous Waste Log can be found in Chapter 5 of MNGR 200-3.





<b>MANAGEMENT OF WASTE BY SEWERING DOCUMENTION</b>
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1. Copies of Wastewater Treatment Works notifications:
  - a.) In seven county metropolitan area:
    - 1) Metropolitan Council of Environmental Services (MCES)
  - b.) All other locations:
    - 1) Publicly Owned Treatment Works (POTW)
2. Copies of MCES Pretreatment Permits.
3. Copies of on-site sewage system designs or permits.

# **PAST HAZARDOUS WASTE GENERATOR LICENSES**