



DEPARTMENT OF THE ARMY  
INSTALLATION MANAGEMENT COMMAND  
UNITED STATES ARMY GARRISON ANSBACH  
UNIT 28614  
APO AE 09177-8614

IMAN-ZB

20 FEB 2013

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: USAG Ansbach Hazardous Material Management Program

1. **PURPOSE.** The purpose of this document is to establish a centralized HMMP and responsibilities for the management of hazardous material (HM) and hazardous waste (HW) within USAG Ansbach. The core objective is to improve logistics and operational mission performance by controlling and reducing the acquisition, use, handling, and disposal of HM and the generation of HW, consistent with Army supply chain integration and sustainability objectives.

2. **REFERENCES:**

- a. AR 710-2, Supply Policy Below the National Level, 28 March 2008.
- b. Department of the Army (DA) Pamphlet 710-7, Hazardous Material Management Program, 31 July 2007.
- c. AER 200-1 dated 8 May 2012
- d. FGS, latest revisions made 10 July 12.

3. **APPLICABILITY.** This program is applicable to all USAG Ansbach activities, tenants, and personnel.

4. **PROPONENT.** The proponent of this program is the 405<sup>th</sup> AFSB Director of Logistics. Recommendations are welcome and should be forwarded to the Chief, Supply and Services Division, in written format. Recommended enhancements should include the submitting activity; point of contact name, address, and telephone number; specific section to be enhanced; proposed enhancement; new text, and justification, to include benefits and drawbacks.

5. **MISSION STATEMENT.** The USAG Ansbach HMMP is an initiative to enhance readiness and improve sustainability through controlling and tracking the acquisition, use, handling, and disposition of HM. The program serves as the base focal point for HM management. It combines many of the traditional functions of the Environmental, Supply, Contracting, Logistics, and Installation Safety Office. The USAG Ansbach HMMP establishes an organization and business practices to implement semi-centralized HM management throughout the Garrison.

**6. FUNDAMENTAL PURPOSE.** The fundamental purpose of the USAG Ansbach HMMP is to substitute, minimize, track, and control the ordering, storing, distribution, use, and disposition of HM through the effective use of multiple point control. It also facilitates the tracking of HW from generation to final disposal. Essential to the program is the requirement to obtain and maintain updated copies of manufacturers' material safety data sheets (MSDSs) for all HM brought on USAG Ansbach and avoid over-ordering of HM. The program utilizes standard Army supply management systems and the Hazardous Material Management System (HMMS) to facilitate necessary tracking and provide a centralized database for management and compliance reporting. The HMMS links processes to materials used and wastes generated. It tracks materials and chemical constituents throughout their life cycle on USAG Ansbach. The HMMS also prepares key mandatory environmental reports and facilitates management reporting.

**7. DUTIES:**

a. The Garrison Commander will:

(1) Ensure that integrated logistics, environmental, occupational safety and health, and hazardous substance (HS) policy and procedures are established and disseminated Garrison-wide.

(2) Appoint a subcommittee to the Environmental Quality Control Committee (EQCC) for oversight and day to day HMMP operational oversight.

(3) Ensure USAG Ansbach Directorates that buy, store or use HM participate in the HMMP and are in compliance with applicable environmental guidance and procedures.

(4) Obtain necessary resources to maintain the HMMP.

b. The Director of Logistics will:

(1) Designate a representative to serve on the HMMP sub-committee as a voting member, who publishes agendas, and prepares reports for the Garrison Commander.

(2) Ensure the safe receipt, handling, storage, and issue of HM.

(3) Ensure that MSDSs are readily available and issued with HM to assure proper handling and emergency response preparedness.



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

- (4) Ensure that the processing of unit or activity turn-ins is timely in order to maximize the potential for transfer and/or reutilization of HM prior to shelf life expiration.
  - (5) Provide necessary logistics data to the Garrison staff in support of Environmental HMMP reporting requirements.
  - (6) Conduct planned and unscheduled HMMP assessments, to include site inspections and assistance visits at least annually.
  - (7) Provide sources for potential nonhazardous product substitution. Conduct pollution prevention assessments when necessary/possible in conjunction with DPW Environmental Div.
  - (8) Identify processes that use HM, or result in unsafe conditions for personnel on USAG Ansbach.
  - (9) Identify HM, authorized users, and levels of storage per location.
  - (10) Preauthorize HM prior to first time ordering.
  - (11) Maintain and process updates of MSDS data.
  - (12) Provide MSDS information to the Fire Department.
  - (13) Review and approve authorized user list (AUL) change requests in coordination with Installation Safety.
  - (14) Prepare ADHOC hazardous substances management reports as required.
- c. The Chief, Environmental Division, Directorate of Public Works (DPW), will
- (1) Designate a representative to serve as a voting member of the HMMP committee.
  - (2) Provide Hazardous Substance technical support to the Garrison Commander and HMMP Committee.
  - (3) Coordinate with the Director of Logistics to ensure that environmental requirements are integrated into the USAG Ansbach HMMP.

IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

(4) Recommend HMMP goals and objectives, consistent with higher headquarters guidance; assist the DOL with pollution prevention assessments when seeking opportunities for enhancing pollution prevention efforts and to measure goal achievement.

(5) Provide data to the HMMP Committee or DOL on HM disposed as HW or any other data related to HW disposal.

(6) Provide technical support during assessment and or inspections of USAG Ansbach operations and tenant activities, in conjunction with Safety, Fire, DOL and/or external offices.

d. The Garrison Safety Office, will:

(1) Designate a representative to serve as a voting member of the HMMP Committee.

(2) Provide safety input to the Garrison Commander and the HMMP committee.

(3) Conduct occupational safety and health planning for the Ansbach community.

(4) Coordinate with the Environmental Division, DPW, DOL to establish policy and procedures to preauthorize HM prior to first-time ordering.

(5) Conduct occupational safety and health assessments to identify opportunities for enhancing safety efforts and reducing risks to Ansbach personnel.

(6) Participate in AUL change approvals.

(7) Include identification of HM not in inspected activities AUL database during scheduled visits and report these items to the HMMP committee for appropriate action.

(8) Conduct supervisors hazard communication familiarization training for USAG Ansbach trainers and supervisors.

(9) In coordination with occupational health nurse, industrial hygiene, environmental management and fire department review and approve the shop specific hazard training program for technical accuracy and completeness prior to implementation in the work/shop area.

(10) During scheduled visits evaluate the effectiveness of the hazardous communication training program, proper handling, storage, use and labeling of hazardous material



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

by USAG Ansbach personnel.

e. The Chief, Business Operations Division, DPW, will:

- (1) Designate a representative to serve as a voting member of the HMMP committee.
- (2) Establish procedures to implement Ansbach HMMP policy within the Division.

f. The USAG Ansbach Army Health Clinic will:

- (1) Follow the Surgeon General guidance and establish a Hazardous Material Control Point (HMCP).
- (2) Publish an SOP for HMCP operations and customer support.
- (3) Enter HM procurements and usage into the Medical Command HM software as they occur or at least weekly.

g. The 69th Signal will:

- (1) Ensure adequate networking to support efficient HMMS transactions between server and clients, as required
- (2) Provide necessary internet protocol addresses and network access to support HMMS
- (3) Maintain HMMS hardware, including required maintenance contracts.
- (4) Provide necessary software to maintain the HMMP.
- (5) Install HM management and related software and hardware upgrades, as required.

h. The HMMP Committee will:

- (1) Be responsible for the integrated efforts necessary to successfully implement HM management software and support enhanced HMMP business practices on USAG Ansbach.

IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

(2) Develop the implementation plan for the HMMP, assign roles and responsibilities, identify and assign actions with necessary milestones, and ensure that milestones are satisfactorily completed and embrace EMS Goals /Objects and Aspects/Impacts in this process.

(3) Serve as the implementation workgroup for the HMMP.

(4) Provide oversight to HMMP operations.

(5) Conduct periodic in-progress review briefings on the status of HMMP implementation and ongoing operations.

(6) Be chaired by the Deputy Garrison Commander.

(7) Include representation from the DOL, DPW, Safety, 69<sup>th</sup> Signal, MWR, DoDDS, Aviation Command, AAFES, Medical Command, and Environmental Officers from all tenant activities. The Garrison Commander or EQCC adjusts membership, as required.

i. The HMMS Database Manager, will:

(1) Establish HMMS access rights as directed by the HMMP Committee. Conduct day-to-day maintenance of the HMMS database and periodic update of tables, as required.

(2) Ensure the daily backup of HM management transaction data.

(3) Respond to Garrison HM management software functional questions.

(4) Coordinate HM management software updates with appropriate offices and the Software provider.

(5) Receive and track USAG Ansbach HM management software engineering change proposals.

(6) Assist the Chief, Environmental Division, in preparing reports using HM Management software data, as required.

(7) Support Hazardous Material Managers in correcting data.

(8) Assist 69<sup>th</sup> signal in identifying and correcting network problems related to HM management software, as required.



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

j. The Director of Emergency Services will:

(1) Designate a representative to serve as a voting member of the HMMP Committee.

(2) Provide policy and guidance on all fire-related issues as they pertain to HM and HW.

(3) Assist recovering found on post HM/HW when notified by Environmental that HM/HW may be life threatening, a danger to the Environment or is part of the first responder mission. Ensure materials are placed in a safe temporary storage until the DPW Environmental Div has arranged removal/disposal services.

k. The Director, Mission and Installation Contracting Command will:

(1) Designate a representative to serve as a voting member of the HMMP Committee.

(2) Set up contract mechanisms with local vendors to meet customer requirements for local purchase items.

(3) Provide guidance controlling/stopping the use of government purchase cards (GPCs) for HM procurement that is not on an approved AUL.

(4) Ensure that all service, maintenance, and construction contracts include Statements that facilitate full support of the installation HMMP.

(5) Report to the Garrison Commander and DOL the purchase of unauthorized HM by GPC holders.

(6) Ensure all contracts through which the Army locally procures hazardous materials contain the appropriate Federal Acquisition Regulation (FAR) clause 52.223-3 "Hazardous Material Identification and Material Safety Data," or the Army equivalent provision.

(7) Ensure contract specifications require contractors who use hazardous chemicals that Army military or civilian workers may be exposed to, provide the information required in FAR clause 52.223-3 "Hazardous Material Identification and Material Safety Data," or Army equivalent provision, to the pertinent Army work area/shop supervisor. Additionally, ensure contracts include a requirement for securing all hazardous materials left on site at the end of the work shift or day.

IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

1. The Supply Support Activities (SSA's) will ensure:

- (1) Proper receipt, handling, storage, and issuing of HM safely.
- (2) MSDSs are readily available to assure proper handling and emergency response preparedness. Assistance in acquiring requisite MSDSs can be obtained from the supplier/manufacturer or the internet.
- (3) Processing for unit or activity turn-ins of HM to timely maximize the potential for transfer, recycling, and/or reutilization. Maintain close coordination with supporting environmental office and DRMO to expedite the removal of excess HM.
- (4) Necessary information is provided to respond to HM reporting requirements, as well as any additional ACOM/ASCC/DRU requirements.
- (5) When advised by the using activity that requested material may be hazardous, note in the purchase request (PR) or the procurement work directive (PWD) for local purchase that a MSDS is required.
- (6) Records of HM being procured locally are established and that all subsequent PRs and PWDs contain requirement for MSDSs.

m. Commanders, activity chiefs and tenants (includes DoDDS, MWR, NATO Units) on USAG Ansbach installation property will.

- (1) Ensure that all processes, HM, and waste streams have been approved and incorporated into the HMMP AUL to allow expeditious HM transactions.
- (2) Ensure the establishment of 2-week shop/laboratory supply levels for HM normally used in day-to-day business.
- (3) Ensure that HM in excess of the 2-week stock age level or in excess of known immediate need is returned to the supply system.
- (4) Obtain all HM from the appropriate authorized source.
- (5) Inspect areas where HM is stored and take inventory of such areas monthly and Document these inventories. Particular attention shall be placed on checking HM expiration dates and HM quantities on hand versus what is allowed on the current AUL. The goal is to prevent HM from being unused then disposed of.



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

(6) Ensure that work areas and laboratories maintain the correct manufacturers' MSDSs for each HM used and/or stored.

(7) Designate personnel authorized to request, receive, and store HM.

(8) Obtain and mark appropriate containers for collecting used HM.

(9) Coordinate the turn-in of unserviceable/expired HM with the DPW Environmental Div. only after attempting to return the HM to the SSA or supplier.

(10) Designate in written form personnel trained and authorized to coordinate and turn in HW.

(11) Ensure that all personnel exposed to HSs in the course of their work receive proper training, to include HAZCOM and proper and adequate personal protective equipment (PPE) is stocked, maintained, and issued to personnel.

(12) Coordinate environmental and safety training with the Environmental Division, DPW, and Safety. Ensure that all personnel are made aware of and comply with this program.

(13) Provide representation to the USAG Ansbach HMMP Committee.

(14) Inspect work areas to ensure that HM has been recorded in the HMMS, HM is properly rotated and stored, and used HM is properly marked IAW regulatory guidance.

(15) Ensure that spill plans are current and readily available for emergency response.

(16) Ensure that HS spill response is immediate and IAW the spill response plan and "Red Plan". Notify the Fire Department for any spill that is 5 liters or more. Within 24 hours of the spill coordinate with the Fire Dept. to submit a spill report to the DPW Environmental Div.

(17) Ensure that appropriate spill response materials are on hand in the form of a spill Kit and such kits are located nearby where spills are likely to occur.

(18) Develop and implement a written hazardous communication Program that complies with 29 CFR 1910.1200.

n. Individual personnel handling and using HSs will:

IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

- (1) Ensure appropriate training when tasks include the handling of HSs.
- (2) Ensure that MSDSs are on hand (electronic or hard copy) for all HM used or on hand. Be familiar with potential hazards associated with each HM used or on hand.
- (3) Wear appropriate PPE when handling HSs. Refer to the MSDSs, product labels, technical manuals, and/or the Installation Safety Office, industrial hygienist, or occupational health nurse for guidance. Individuals should also ensure that PPE is maintained IAW applicable technical documents.
- (4) Handle HM IAW the MSDS and product labels.
- (5) Store HM IAW Army and Host Nation guidance and procedures.
- (6) Place used HM in properly marked containers.
- (7) Notify supervisors and the DPW Environmental Div. when new processes or materials are required and/or when new waste streams will be generated.
- (8) Contain and clean up all spills immediately and report the spill to supervisors. For spills that pose a safety or health threat to personnel or the environment, immediately notify the Fire Department first and then the Environmental Division, DPW. Consult site specific spill plans for more details.

## **8. AUTHORIZED USAGE LIST (AUL), (HM, PROCESSES, AND ALGORITHMS)**

### **a. AUL Definition.**

- (1) The AUL is the listing of processes and hazardous materials approved for use within USAG Ansbach activities and tenants. It sets the maximum amount of HMs to be used per process/activity.
- (2) The AUL is the composite of the HMMS table information that links processes using HM and/or generating HW, authorized HM, anticipated waste streams, and algorithms to estimate releases. An HMMS AUL record is created when an HMMS master inventory record is approved for use or storage on USAG Ansbach and is linked to a site-specific process record.
- (3) Each authorization includes a review and approval of all aspects of a process, the HM required per process, the resulting waste stream(s) and emissions, and the work center(s)



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

Involved. The AUL supports the USAG Ansbach HMMP policy and serves to control the purchase of HM.

b. AUL Use.

(1) The AUL is used to control HM acquisition, to identify types of HM usage, to estimate HW generation, to prepare environmental reporting, and as a pollution prevention tool. Each requisition, receipt, and issue transaction is validated against the AUL prior to completion. Transaction exceptions to the AUL will be reported to the Director of Logistics for appropriate action. The HMMS automatically validates each issue transaction against established authorizations prior to issue. Unauthorized requests cause a system warning, which must be overridden by the HMMS operator. Overriding the warning requires approval from the Environmental Division, DPW and DOL. Overriding the AUL and shelf life expiration message during material transactions creates exception reports. Work area supervisors, the Environmental Division, DPW, and Garrison Safety review exception reports and take actions necessary to correct the cause for the current exception and those actions needed to preclude a recurrence.

(2) Each distinct operation, such as painting, using a re-circulating solvent parts washer, performing a medical procedure, or maintenance activities in motor pools, hangars and shops, constitutes a process in the HMMS. Processes may be activity-specific but are generally not location-specific. Processes generate waste.

(3) HW characterization records describe the waste and waste container. HW Characterizations can be referenced using unique names, locally assigned codes, or contract line numbers. An algorithm for each approved process is created and entered into the HMMS. Algorithms predict the fate of materials used in a process and use this to collect information for pollution prevention opportunity assessments.

c. Maintaining the AUL.

(1) All supervisors are responsible for ensuring that the HMMS database accurately reflects approved processes, HM used, and HW generated. AUL change requests are processed through the (not sure who this should be). Changes to HM usage are processed in advance of HM procurement to ensure the efficient flow of HM through the system.

(2) Proper HM management requires pollution prevention opportunity assessments and Reporting.

(3) HMMP inspection points will be added to the command logistics inspection criteria by the Director of Logistics. Inspections of and assistance visits to verify that HMMP policy and



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

Guidance have been implemented and are being followed will be conducted on a scheduled and unscheduled basis. Inspection results will be provided to the Chief, Supply and Services Division, DOL, for corrective action. A copy of the report identifying shortcomings, opportunities for improvement, and recommended solutions is forwarded to the HMMP Working Group for review and appropriate action.

(4) The Environmental Division, DPW, will provide technical support during pollution prevention opportunity assessments, which identify the potential for reduced HM acquisition through changes to processes or material substitution. They also assist in identifying opportunities to reduce HW generation through material substitution or process change. The HMMS provides sufficient HW, HM, and chemical inventory and uses information to support assessments. The centralized database provides opportunities for ad hoc management reporting.

(5) USAG Ansbach activities/tenants are required to participate in any Pollution Prevention Assessments regardless of who conducts them and, adhere to proposed process changes. Requests are made through the Environmental Division, DPW. Inspection reports are provided to operational managers and to the HMMP Working Group for appropriate action.

d. Expected HMMP Benefits. The USAG Ansbach HMMP—

(1) Helps the Garrison Commander protect human health and the environment through enhanced compliance with existing laws and regulations. This further supports sustainability objectives.

(2) Generate savings through the reduction of usage of HM, reduce unused HM being disposed as HW, elimination of duplicate tracking and information systems, , and support of the new tasks imposed on all Garrisons by Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management.

(3) Contributes to the safe handling of HM and reduces the potential for notices of violations and the monetary fines associated with them.

(4) Ensures HM tracking and reporting and provides data showing the status and location of HM to all post organizations requiring that information.

(5) Can realize cost savings in both the procurement of HM and the disposal of hazardous wastes and solid.

(6) Addresses inherent problems with shelf life expiration dates, environmental and occupational safety and health risks, safe storage requirements, security, disposal and liability



IMAN-ZB

SUBJECT: USAG Ansbach Hazardous Material Management Program

costs, and tracking and reporting requirements

(7) Can realize significant cost savings from reducing the amount of HM.

The proponent agency of this plan is the Supply and Services Division, Directorate of Logistics. Users are invited to send comments and suggested improvements to Director of Logistics ATTN: Supply & Services.

FOR THE COMMANDER:

  
Kevin Griess  
Deputy Garrison Commander

Distribution:

DPW

DOL

MWR

DES

PAIO

PAO

DPTMS

Safety

Ansbach/Illesheim Army Airfield Managers

CDR, 12<sup>th</sup> CAB

CDR, 3-158

CDR 5-158

CDR 2-159

CDR 3-159

CDR, 412 ASB

CDR 3-58 AOB

CDRs, Health & Dental Clinics, Katterbach

CDRs, Health & Dental Clinics Illesheim

CDR, 1st PLT 527th MP Co

CDR, 2nd PLT 527th MP Co

7 JMTC-TSC Ansbach

AAFES Car Care, USAG Ansbach  
AAFES, USAG Ansbach  
DeCA, USAG Ansbach  
DPW Illesheim, USAG Ansbach  
DPW – O&M, USAG Ansbach  
DoDDS  
Health Promotion Officer  
TASM