

#### DEPARTMENT OF THE ARMY

# US ARMY INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT HAMILTON 113 SCHUM AVE. BROOKLYN, NEW YORK 11252-5300

AMIM-HAG-ZA

Policy Letter# 34

12 July 2022

MEMORANDUM FOR All Members of the USAG Fort Hamilton Community

SUBJECT: Management Control of Workplace Hazards and Hazardous Material

#### 1. REFERENCES:

- a. DOD 6050.05 DoD Hazard Communication (HAZCOM) Program (10 June 2019)
- b. AR 385-10 Army Safety Program (24 February 2017)
- c. 29 CFR 1910.1200 Occupational Safety & Health Code of Federal Regulation
- 2. PURPOSE. To provide guidance and assign responsibilities for implementation of the Army Hazardous Material Control and Management Program and to ensure occupational safety and health requirements are considered for plans, specifications and work contracts involving our operations.
- 3. This instruction applies to the US Army Garrison Fort Hamilton and all tenants.
- 4. DISCUSSION. Reference 1a requires the safety function to review operations including plans, specifications and contract work to determine compliance with safety, health and hazard control requirements. Reference 1b established the Army hazardous material control and management program. This program is designed to provide life cycle and total quality management and control of hazardous material. One of the Army's objectives is to eliminate or minimize the use of hazardous materials wherever possible. However, when hazardous materials must be used at Army workplaces, they shall be managed and controlled in accordance with all applicable Federal, State, and Local requirements in order to protect the user, the general public and the environment. Enclosure (1) contains the requirements of reference 1c.

#### DEFINITIONS.

- a. Hazardous material: All chemicals defined as hazardous by reference 1b and 1c. Some characteristics of a hazardous chemical include: flammable, corrosive, strong oxidizing or reducing agent, toxic, causes first degree burns, produces sensitizing or irritation effects. Examples of hazardous material include cleaning chemicals, glues, solvents and thinners.
- b. Safety Data Sheets (SDS): A fact sheet provided by the manufacturer of a hazardous material that identifies the chemical hazards; precautions for safe handling and use; and control measures.

- c. Unit Safety Board. Safety board contains current safety policies and relevant safety information.
- d. Authorized Hazardous Material Use List. A list of hazardous material that has been authorized for use at US Army Garrison Fort Hamilton facilities.

### 6. ACTION.

- a. All directorate, tenants and contractors shall coordinate the following activities with the Safety Office to ensure occupational safety, health and hazardous material control requirements are considered:
  - (1) Specifications for the purchase of hazardous materials to be used on Fort Hamilton.
  - (2) Plans and specifications for field activity major construction/renovation projects.
- b. The Safety Office shall participate in pre-solicitation and prior to commencement-of-work meetings for contracts that require work to be performed in our facilities involving hazardous materials.
  - c. An accident/safety plan shall be provide for all construction/renovation projects and the Safety Office shall review said Plan 14 days prior to commencement-of-work.
  - d. All hazardous material used by Fort Hamilton personnel must be on the Authorized Hazardous Material Use List prior to their purchase.
  - e. All addressees will carry out the responsibilities contained at enclosure.
- 7. Point of contact concerning this policy is the Safety Officer at (718) 630-4232.

BRIAN A. JACOBS

COL, AD

Commanding

Subject: Management Control of Workplace Hazards and Hazardous Material

ENCL 1

**DISTRIBUTION:** 

Α

#### **Enclosure**

## HAZARDOUS MATERIAL CONTROL AND MANAGEMENT PROGRAM RESPONSIBILITIES

- 1. Authorized Hazardous Material Use List.
- a. The Installation Safety Office (ISO), in coordination with using codes, will compile a list of all hazardous material used at Fort Hamilton by work location. Managers will review hazardous materials used in their operation and, if possible, substitute these items with non-hazardous materials. This list shall be reviewed and updated semi-annually, January & June.
- b. ISO will submit the list to the command section for approval. Upon approval, this will be the Authorized Hazardous Material Use List.
- c. Request for additions or deletions to the Authorized Hazardous Material Use List must be submitted to ISO for review and submission to the command section for approval.
- d. The Authorized Hazardous Material Use List will be maintained in the US Army Garrison Fort Hamilton Safety Office. The Safety Office will distribute this list to appropriate codes.
- 2. Safety Data Sheets (SDS). ISO will maintain a reference library of Safety Data Sheets for each chemical included on the authorized hazardous material use list. This library is available for review by all personnel. Safety Data Sheets are also available in all work locations where hazardous materials are used.
- Acquisition of Hazardous Material.
- a. All hazardous material used for Fort Hamilton facilities must be on the authorized hazardous material use list prior to their purchase. A copy of this list is available from the ISO.
- b. Directorate of Contracting shall use the contract clauses contained in 48 CFR 52.223-3 "Hazardous Material Identification and Material Safety Data."
- c. Safety Data Sheets (SDS) shall be provided by the supplier of all hazardous chemicals. The request for an SDS will be a part of all purchase orders for chemicals used by Fort Hamilton. Contracts establishing a blanket purchase agreement shall require a vendor to provide SDS for all materials to be ordered on this agreement.
- d. Safety Data Sheets are not required for hazardous material purchased for subsequent resale.

Subject: Management Control of Workplace Hazards and Hazardous Material

- 4. Labels and Other Forms of Warning.
  - a. When hazardous materials are required for an operation, managers will ensure that only those materials on the authorized hazardous material use list are use.
  - b. Containers holding hazardous material that has been removed from their original container must be identified as to the contents.
- 5. Spillage and Disposal.
- a. Managers will immediately notify the Command, DPW and SO of any spill of hazardous material.
- b. An emergency response spill kit will be maintained in DPW. This kit will be used to contain hazardous material spills and prevent the spill from entering the drain system. SO will approve the contents of this kit.
  - c. Hazardous waste will not be kept at Fort Hamilton facilities for over 60 days.
- Personnel Protective Equipment.
- a. ISO will review the SDS and determine the requirements for personal protective equipment.
- b. All employees involved in handling hazardous material will wear the prescribed personal protective equipment (e.g., gloves, aprons, eye protection, etc.) required for the operation.
- Storage.
  - a. Flammable and combustible liquids shall be stored in a flammable storage locker.
- b. Flammable and combustible liquids actually being used (one day supply) are exempted from the requirement of paragraph 7a.
- 8. Training.
- a. Employees that routinely work with, or are exposed to hazardous chemicals in their work place, will receive annual hazardous material training.
- b. At the time of employee's initial assignment and whenever a new hazardous material is introduced in the work area, information and training on hazardous materials will be provided. The training shall inform each associate in the following areas:
  - (1) Operation in their work area where hazardous substances are present.
- (2) Methods and observations that are used to detect the presence or release of a hazardous substance in the work area.

- (3) The physical and health hazards associated with the hazardous substance.
- (4) Measures to be taken to protect themselves from these hazards, including specific procedures implemented to protect from exposure to hazardous substances (e.g., appropriate work practices, emergency procedures, and personal protective equipment).
- (5) Use of SDS and how personnel can obtain and use the appropriate hazard information.
  - (6) Emergency procedures to take in case of a spill.
- c. Hazard Communication, HAZCOM, training will be given to new associates during New Employees Orientation and to managers/supervisors annually.
  - (1) ISO will provide training, as required by reference 1a. All training will be documented on training attendance records and file maintained by ISO.
- 9. Non-Routine Tasks. Managers planning work tasks that are not routine day-to-day operations involving chemical materials, must coordinate with ISO prior to beginning the operation.
- 10. Contractor Employers and Employees.
- a. Contractors are to inform the area manager and ISO of hazardous chemical materials that they have brought with them for their use, and provide SDS.
- b. ISO will inform the contractor of chemical hazards to which the contractor may come in contact. The contractor will, upon request, have access to appropriate SDS.