



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
U.S. ARMY INSTALLATION MANAGEMENT COMMAND-PACIFIC
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
745 WRIGHT AVENUE, BUILDING 107, WHEELER ARMY AIRFIELD
SCHOFIELD BARRACKS, HAWAII 96857-5000

JUL 23 2018

IMHW-ZA

MEMORANDUM FOR All Army Units, Tenants, Other Military Services, Soldiers, Civilians and Contractors Traveling or Conducting Activities within the United States Army Garrison, Hawaii (USAG-HI) Installations.

SUBJECT: Policy Memorandum USAG-HI-33, Spill Kit Requirements

1. References.

- a. 40 Code of Federal Regulations, Part 112 – Oil Pollution Prevention.
- b. USAG-HI Spill Prevention Control and Countermeasures Plan, 18 Sep 14.
- c. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 Dec 07.
- d. AR 350-19, the Army Sustainable Range Program, 30 Aug 05.

2. Applicability. This policy applies to all Army units, tenants, other military services, soldiers, civilians and contractors working, training, conducting maintenance activities or operating vehicles and equipment containing hazardous fluids on USAG-HI installations including, but not limited to, Oahu training ranges and roadways. This policy also applies to Army units operating tactical vehicles and convoys on Oahu public roads.

3. Background. State and federal laws prohibit the uncontrolled discharge of Petroleum Oil and Lubricant (POL) or other hazardous substances to groundwater, surface water or soil. Immediate actions must be taken to control, contain, and recover accidental spills. The most common cause of accidental spills on USAG-HI installations, roads and training ranges is due to tactical vehicles and equipment leaks, drips, ruptured hoses or pipes and vehicular accidents.

4. Policy.

- a. All users of Army installations, range roads and training land on the island of Oahu, Hawaii, are required to follow environmental protection measures and plan for contingencies in the event of equipment failure to ensure incidental spills of POL and other hazardous substances are promptly contained in order to minimize environmental impacts.

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b. USAG-HI requires that adequate and sufficient quantities of POL spill response supplies and equipment be kept at maintenance and other industrial facilities as well as onboard tactical vehicles while traveling on USAG-HI installations, training ranges and public roads. Access to adequate and readily available spill kits can make the difference between a catastrophic emergency spill and a release that can be controlled and prevented from further migration, infiltration or reaching waterways.

c. Encls 1-A and 1-B provide suggested lists of supplies and equipment to be kept at maintenance facilities and onboard tactical vehicles. As a general rule, the appropriate stock and type of spill recovery equipment and supplies at maintenance facilities shall be determined based on the Unit's core mission and their Modified Table of Organization and Equipment (MTOE), taking into consideration the likelihood of a worse case spill scenario. On the other hand, spill kits that must be carried along while operating tactical vehicles on roadways shall be sized to respond to a small fuel tank, oil, radiator, or hydraulic fluid leaks and other likely potential small spill scenarios. At a minimum one spill kit containing absorbents, plastic bags, a drip pan, non-sparking shovel and dust pan, and a broom shall be onboard each tactical vehicle traveling alone or per three tactical vehicles if traveling in convoy.

d. Vehicle operators must check their spill kit inventory before departing to ensure they have the required supplies available. Consumed spill response materials shall be promptly replenished. Absorbent material that is not saturated can be reused at the Unit/Organization's maintenance facility. Spent and saturated materials shall be promptly disposed of per the Installation's Hazardous Waste Management Plan (USAG-HI Regulation 200-4, 19 Mar 18) available for download at <http://www.garrison.hawaii.army.mil/command/documents.htm>.

e. All leaks and spills must be controlled and cleaned up immediately on the spot. Cleaning up spills is the responsibility of the unit or organization that caused the spill. When a spill occurs, care shall be exercised to prevent or minimize release onto soil or into streams and drainage systems. (Refer to Encl 2 for basic spill containment and cleanup techniques.)

f. All spills must be verbally reported to the Directorate of Public Works (DPW) Environmental Division (ED) within 15 minutes of initial discovery at:

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Report to DPW Environmental Division	
Work Hours - Spill Line	656-1111
After Hours – Installation Operation Center (IOC)	656-3272
Submit Spill Report Form (Encl 3) to DPW-ED	

Notify Your Unit or Organization Environmental Compliance Officer (ECO)

g. A written Spill Notification Form must be submitted to the DPW-ED as soon as possible, but no later than eight hours after making the initial verbal notification. (The Spill Notification Form is included at Encl 3 and is also available for download at: <http://www.garrison.hawaii.army.mil/sustainability/SpillPreventionResponse.aspx>.)

h. Each spill incident is unique. The site-specific conditions will dictate the cleanup procedures to be used. The DPW-ED has oversight responsibility to ensure cleanup levels meet regulatory standards and, depending on the situation, the DPW-ED may respond to the scene of a spill to supervise the cleanup operation, the ability of the responsible party to contain the substance, and the gravity and potential risks of the incident to the environment, wildlife and surrounding communities.

5. This policy supersedes Policy Memorandum USAG-HI-33, SAB, dated 26 Aug 16 and remains in effect until rescinded or superseded in writing.

6. The point of contact for this policy memorandum is the Environmental Division, Directorate of Public Works at 656-3106 or 656-3103.

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THOMAS J. BARRETT
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Commanding

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Enclosure 1-A









Recommended Spill Response Supplies to Keep at Maintenance Facilities

1. Each Unit/Organization is responsible to maintain spill kits tailored to the needs and type of operation/activity conducted at their facility, taking into consideration the amount of POL stored in containers and equipment as well as the proximity of surface water or drains. Reference to National Stock Numbers (NSNs) and suggested spill response supplies to keep at maintenance facilities include the following:

RECOMMENDED SPILL KIT INVENTORY FOR MAINTENANCE FACILITIES				
#	Item	Description	Minimum Quantity	Unit of Issue
1		<p>Clay Based Dry Sweep (Kitty litter/vermiculite)</p> <ul style="list-style-type: none"> • Dry sweep granular absorbent material – clay, diatomaceous earth, silicate calcite type absorbent material or other mineral and synthetic absorbent for use in absorbing oil. • Works well on cement and asphalt. • Must work/grind the dry sweep with foot pressure and let it rest for a few minutes to absorb the liquid. • Pick up the dry sweep and reuse if not saturated or turn in to the TAP for disposal. • Not good when it is raining and not good for spills onto soil. • Non-Biodegradable. <p>NSNs: 7930-00-269-1272; 7930-01-380-4783; 7930-01-418-1164; 4235-01-528-0401; 4235-01-528-0403</p>	10	20-50 Lbs. Bags
2		<p>Saw Dust/Plant-based granular absorbent</p> <ul style="list-style-type: none"> • Absorbs a wide range of oils, fuels, antifreeze, etc. • Absorbent often contains enzymes and microorganisms that break down POLs into non-toxic carbon dioxide, water and fatty acids. • Good for outdoor oil spills on asphalt, cement and soil. • Good to use when it is raining or to absorb free liquid. • Biodegradable. Can be incinerated. <p>NSNs: 4235-01-599-3952; 4235-01-572-3902; 4235-01-572-3892; 4235-01-599-3952; 4235-01-595-9846; 4235-01-5723-908; 4235-01-436-8317</p>	5	20-50 Lbs. Bags
3		<p>Peat moss/cellulose loose absorbent</p> <ul style="list-style-type: none"> • Can be scattered directly onto the oil floating on water. • Absorbs the oil on contact and encapsulates it. Water does not penetrate the peat moss, so the encapsulated oil is trapped in a non-sticky crust which is then removed from the surface of the water. • Biodegradable. Can be incinerated. <p>NSNs: 4235-01-423-1466; 4235-01-423-0711</p>	5	20-50 Lbs. Bags
4		<p>Oil only/hydrophobic absorbent pads (Usually white)</p> <p>NSNs: 4235-01-415-9186; 4235-01-451-8744; 4235-01-158-3502; 4235-01-219-7414; 4235-01-318-6584; 4235-01-399-3035; 4235-01-417-1959; 4235-01-420-6760</p>	100	Each

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RECOMMENDED SPILL KIT INVENTORY FOR MAINTENANCE FACILITIES				
#	Item	Description	Minimum Quantity	Unit of Issue
5		<u>Universal Absorbent pads (Usually gray or green)</u> NSNs: 7930-01-436-8314; 7930-01-363-8631; 7930-01-369-3446; 7930-01-436-8313; 7930-01-448-8636; 4235-01-379-8381; 4235-01-396-1650; 4235-01-415-9194	100	Each
6		<u>Oil only absorbent pillows (usually white)</u> NSNs: 4235-01-456-8571; 4235-01-379-8376; 4235-01-432-7086; 4235-01-432-7099; 4235-01-432-8485; 4235-01-456-8571; 7930-01-436-8316	10	Each
7		<u>Universal absorbent pillows (Usually gray)</u> NSNs: 4235-01-308-5151; 4235-01-429-2678; 4235-01-442-4745; 4235-01-456-8575; 4235-01-528-0378; 7930-01-353-6414; 7930-01-448-8637	10	Each
8		<u>Oil only socks ((3"-4" Diameter x 4' Long)</u> NSNs: 4235-01-391-2046; 4235-01-391-2048; 4235-01-423-1465; 4235-01-423-1467; 4235-01-431-9993; 4235-01-572-3929	50	Each
9		<u>Universal socks ((3"-4" Diameter x 4' Long)</u> NSNs: 4235-01-416-8997; 4235-01-416-9008; 4235-01-456-8858; 4235-01-456-8862; 4235-01-528-0386; 4235-01-572-3929; 7930-01-289-8834; 7930-01-301-2646	50	Each
10		<u>Oil only booms (6"-8" Diameter x 8' Long)</u> NSN: 4235-01-441-0248	5	Each
11		<u>Acid & base spill response kit</u> NSN: 4235-01-493-2437	1	Kit
12		<u>Drain cover/mat</u> NSN: 4235-01-526-1641	1	Each
13	<u>Straight edge non-sparking shovels</u>		2	Each
14	<u>Spade shovels (for soil excavation)</u> NSN: 5120-00-188-8450		2	Each
15	<u>Push Broom</u> NSN: 7920-00-292-2367		5	Each
16	<u>Dust Pan</u> NSN: 7290-00-616-0109		2	Each

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RECOMMENDED SPILL KIT INVENTORY FOR MAINTENANCE FACILITIES				
#	Item	Description	Minimum Quantity	Unit of Issue
17	<u>Drum, 55 gal, open head</u> <u>NSN: 8110-00-030-7780</u>		3	Each
18	<u>Drum, 55 gal, closed head drum with one each 3/4 inch and 2 inch openings</u> <u>NSN: 8110-00-292-9783</u>		2	
19	<u>Drum, 85 gal, overpack</u> <u>NSN: 8110-01-101-4055</u>		2	Each
20	<u>Spill containment pallet (Holds 4 drums)</u> <u>NSNs: 3990-01-398-8107; 3990-01-620-2437</u>		4	Each
21	<u>Drip pans (1 each per vehicle)</u> <u>NSNs: 4949-01-490-2455; 4940-01-490-2463; 4940-01-490-2470; 4910-00-287-2944</u>		30+	Each
22	<u>Drum funnel</u> <u>NSNs: 8110-17-117-9701; 8110-17-120-3644; 7240-15-207-2829</u>		5	Each
23	<u>Durable plastic bags</u>		100	Each
24	<u>Nitrile gloves or other Chemical Resistant gloves (Various Sizes)</u>		1	Box
25	<u>Chemical resistant splash goggles</u>		5	Each
26	<u>Chemical resistant patches, plugging compound, repair putty and cone plugs</u>		1	Kit

2. Other NSNs or vendor sources with comparable products for items listed above are also acceptable.

3. Available Local Vendor Sources:

- Dash Pacific: 808-230-2422; http://www.dashpacific.com/Dash_Pac_catalog.html
- Grainger: 808-423-0028; <http://www.grainger.com>
- Safety Systems: 808-847-4017; <http://www.ssshinc.com>
- American Patriot Sales & Service: 910-229-2236; <http://store.ampatss.com>

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Enclosure 1-B
Recommended Spill Response Supplies to Carry in the Field

1. Personnel shall be familiar in the use of the equipment and supplies contained in their spill kit.
2. A minimum of one (1) spill kit per three (3) vehicles convoy is required. Spill kits must be adequately sized and stocked to rapidly respond to a likely spill scenario associated with the specific operation conducted. At a minimum each spill kit must include absorbents, plastic bags, drip pan, non-sparking dust pan, a shovel, and a broom. Suggested basic field spill kits include the following:

RECOMMENDED SPILL KIT INVENTORY FOR FIELD EXERCISES		
Item	Quantity	NSNs
• Drip pans	2	4910-00-287-2944
Granular absorbent / loose absorbent		
• Dry sweep – clay, diatomaceous earth, or other loose biobased absorbent	30-40 Lbs	7930-00-269-1272 7930-01-380-4783
• Biobased/biodegradable granular absorbent material		4235-01-599-3952
Absorbent pads		
• Synthetic (oil only) polyethylene absorbent pads	25	4235-01-415-9186
• Biobased/biodegradable (oil only) cotton absorbent pads		4235-01-451-8744
Pillows, mats		
• Synthetic (oil only) polyethylene absorbent pillows	3	7930-01-353-6414
• Biobased/biodegradable (oil only) cotton absorbent pads		4235-01-572-3933
Socks and booms (Minimum 3 in. diameter x10 ft. length)		
• Synthetic (oil only) polyethylene absorbent socks	6	7930-01-353-6415
• Biobased (oil only) cotton absorbent socks		4325-01-572-3929
Miscellaneous		
• Durable plastic bags	25	
• Broom with non-sparking dustpan	1	7920-00-292-2367 7290-00-616-0109
• Straight edge non-sparking shovels (fabricated with non-ferrous metal, with a polypropylene coating on the blade, or fully fabricated from polypropylene)	3	
• Spade shovels (for soil excavation)	3	5120-00-188-8450
• Chemical resistant patches and plugging compound, repair putty and cone plugs to temporarily stop leaks	1 Kit	
• Nitrile Gloves	12	
• Drum, 55 gal, removable cover (Kept at motor pool/maintenance facility)	1	8110-00-030-7780
• Drum, 85 gal, overpack (Kept at motor pool/maintenance facility)	1	8110-01-101-4055
• Chemical resistant splash goggles	2	
Note: Other NSNs or vendor sources with comparable products for items listed above are also acceptable.		

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Enclosure 2
Spill Recovery Guidelines

1. For All Spills.

a. Refer to the Safety Data Sheet pertaining to the spilled substance for appropriate response actions.

b. For emergencies or if substance is unknown, call 911.

c. Spills must be recovered immediately to preclude saturation on paved surfaces or into the ground and to prevent storm water runoff.

d. Ensure absorbent used is compatible with the substance spilled. There are various types of loose or granular absorbents, pads, pillows socks and booms that are optimized to absorb different types of liquid. Since there is no industry standard color-coding index that covers all brands of absorbents in the market, Units and Organizations must refer to the manufacturer's specifications for their proper application.

2. Preparation.

a. If possible, stop the source of the spill.

b. Park the leaking vehicle or equipment over concrete or asphalt surface whenever possible and safe to do so.

c. Place drip pan under the leak. Alternatively, place absorbent pads over an impervious surface such as plastic bags or plastic sheeting to absorb the leak.

d. Immediately block off pathways to soil and drainage systems with absorbent socks, booms, or nonabsorbent barriers like dikes and drain blockers or covers.

3. Recovery.

a. Hard Surfaces

(1) Small spills on asphalt or paved surfaces are most easily recovered using granular absorbents. Note that absorbents do not neutralize a spill or make it less hazardous to personnel.

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(2) Sprinkle the granular absorbent over the spill in sufficient quantity to absorb the spilled petroleum oil and lubricants (POL). Allow time to set and then work into the surface.

(3) Sweep or collect used absorbent. In some cases a second application of granular absorbent may be necessary to completely recover the spill.

(4) Granular absorbents will generally be ineffective if it is raining. In that case, use hydrocarbon absorbent pads and booms, which only absorb oil (not water), to contain and absorb the spill. Note that certain biobased or biodegradable granular absorbents are also functional in the rain.

(5) Used granular absorbent (dry sweep) shall be placed in a drum and properly marked with date and content (e.g., *"Spill Debris/hydraulic fluids 06/19/18"*).

(6) Absorbent pads and rags can be placed in clear durable trash bags also labeled as per the above example.

(7) Store spill debris at the Unit or Organization motorpool or maintenance facility Recyclable Material Shop Storage Point (RMSSP) until turned in to the installation 90-day Transfer Accumulation Point (TAP) by contacting the DPW-ED at 656-3097.

b. Soil or Grassy Surfaces

(1) Spills on bare soil are rapidly absorbed into the ground and must be recovered quickly.

(2) Before digging, recover all free products that pooled on the ground. Use absorbent pads or pillows to absorb free product to decrease the amount of POL contaminated soil that must be removed.

(3) Excavate the soil by digging down and outwards recovering all stained soil. Continue digging until all stained soil is removed, plus six to twelve inches past visible staining to ensure all POL-contaminated soil is excavated. The DPW-ED will provide guidance on the extent of excavation required.

(4) Package contaminated absorbents and contaminated soil separately.

(5) Contaminated soil shall be placed in a drum and properly marked with date and content (e.g., *"Soil contaminated with hydraulic fluids, 06/19/18"*).

(6) Absorbent pads and rags can be placed in clear durable trash bags also labeled as per the example above.

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(7) Store spill debris at the Unit or Organization motor pool or maintenance facility RMSSP until turned in to the installation 90-day Transfer Accumulation Point (TAP) by contacting DPW-ED at 656-3097.

c. Waterways. Spills entering waterways or spills likely to enter waterways are much more serious. According to the Environmental Protection Agency (EPA), a spill of only one gallon of POL can contaminate one million gallons of surface water. Response to this type of spill will likely require specialized equipment, expertise and assistance from the Naval Facilities Engineering Command (NAVFAC) Hawaii or contract support from a qualified hazardous waste/materials spill response firm. The DPW-ED will provide coordination assistance with the appropriate trained hazmat responders and emergency cleanup agencies should this situation arise.

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Enclosure 3 - USAG-HI Spill Notification Form

Regardless of amount of spill, all spills of oils, hazardous materials, or unknown chemicals must be immediately reported to the DPW Environmental Division Emergency Response Spill Line at 656-1111, followed up by written notification on this form. Any person who knowingly fails to report spills shall be liable for criminal penalty.

[EMAIL TO DPW ENVIRONMENTAL DIVISION AT frederick.j.miller42.civ@mail.mil and chantal.c.sauveleonard.ctr@mail.mil OR FAX TO (808) 656-1039]

A. Reporter Information (to be completed by reporting unit/activity)

Name (Last, First, Middle) _____ Phone _____ Position _____ Office symbol/company name _____
Company Address _____ Time/Date DPW Environmental Notified _____
Person notified _____ Location of Spill _____ Time of Spill _____ Date of Spill _____ Substance spilled _____
Amount Spilled _____ Duration of Spill _____ Media into which the release/spill occurred or is likely to occur:
____ Air ____ Soil ____ Ground ____ Water ____ Concrete ____ Asphalt ____ Stream ____ Ocean Other: _____
Amount entered waterway _____ Number of injuries _____ Number of deaths _____ Number evacuated _____
Actual damage _____
Cause of spill _____
Detailed description of clean-up actions _____
Preventive actions to be taken _____

SUBMITTED BY:

Name/title/phone number _____

Signature _____

B. Environmental Division Information (to be completed by DPW Environmental Division personnel)

>CERCLA RQ (40CFR 117, 302) ____ (Y/N)

HEERO Notification (808) 586-4249/after hrs 247-2191

ED staff _____

Notified at ____:____ on ____/____/____

Report number _____

Written Notification to be submitted: ____ (Y/N) by ____/____/____

Person notified _____

LEPC Notification (808) 523-4121 (Honolulu)/Fax 524-3439

ED staff _____

Notified at ____:____ on ____/____/____

Person notified _____

NRC Notification (800-424-8802)

ED staff _____

Notified at ____:____ on ____/____/____

Report number _____



DEPARTMENT OF THE ARMY
HEADQUARTERS, 25TH INFANTRY DIVISION AND U.S. ARMY HAWAII
BUILDING 580 KOLEKOLE AVE
SCHOFIELD BARRACKS, HAWAII 96857-6000

APVG-JA-AL

13 June 2018

MEMORANDUM FOR RECORD

SUBJECT: LEGAL REVIEW – Policy Memorandum USAG-HI-33, Spill Kit Requirements

1. References.

- a. 40 Code of Federal Regulations, Part 112 – Oil Pollution Prevention.
- b. USAG-HI Spill Prevention Control and Countermeasures Plan, 18 Sep 14.
- c. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, 13 Dec 07.
- d. AR 350-19, the Army Sustainable Range Program, 30 Aug 05.

2. BLUF. Policy Memorandum USAG-HI-33 is legally sufficient.

3. Background.

a. State and federal laws prohibit the uncontrolled discharge of Petroleum Oil and Lubricant (POL) or other hazardous substances to groundwater, surface water or soil. Immediate actions must be taken to control, contain, and recover accidental spills. The most common cause of accidental spills on USAG-HI installations, roads and training ranges is due to tactical vehicles and equipment leaks, drips, ruptured hoses or pipes and vehicular accidents.

b. All users of Army installations, range roads and training land on the island of Oahu, Hawaii, are required to follow environmental protection measures and plan for contingencies in the event of equipment failure to ensure incidental spills of POL and other hazardous substances are promptly contained in order to minimize environmental impacts.

c. USAG-HI requires that adequate and sufficient quantities of POL spill response supplies and equipment be kept at maintenance and other industrial facilities as well as onboard tactical vehicles while traveling on USAG-HI installations, training ranges and public roads. Access to adequate and readily available spill kits can make the difference between a catastrophic emergency spill and a release that can be controlled and prevented from further migration, infiltration or reaching waterways.

4. Legal Analysis.

a. This policy memorandum adequately addresses the spill kit requirements as mandated by state, federal, and Army policies.

5. The point of contact for this memorandum is 1LT Hannah Hadland at 808-655-8738 or at hannah.j.hadland.mil@mail.mil.

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Administrative Law Attorney