

#### DEPARTMENT OF THE ARMY

# INSTALLATION MANAGEMENT COMMAND HEADQUARTERS, UNITED STATES ARMY GARRISON HUMPHREYS UNIT #15228 APO AP 96271-5228

AMIM-HMP-E (100)

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## MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Command Policy # 39, Hazardous Materials Management Program (HMMP)

### 1. References.

- a. Army Regulation (AR) 200-1, Environmental Protection and Enhancement, Headquarters Department of the Army, Washington DC, 13 December 2007.
- b. Department of the Army Pamphlet (PAM) 710-7: Hazardous Material Management Program, 23 March 2017.
- c. Eighth Army Command Policy Letter #25, Command Supply Discipline Program, 30 November 2020.
- d. HQDA EXORD 181-21, Use of Enterprise Environmental, Safety, and Occupational Health Management Information System (EESOH-MIS) for Hazardous Material Management, 24 April 2021.
- e. AMC Operations Order 21-185, U.S. Army Material Command (AMC) Use of Enterprise Environmental, Safety and Occupational Health Management Information System (EESOH-MIS) for Hazardous Materials Management, 16 July 2021.
- f. United States Army USAG Humphreys Hazardous Material Management Program (HMMP), November 2022.
- 2. Background: Installations are procuring significant quantities of hazardous material (HM) and generating large amounts of hazardous waste (HW). Storing excess hazardous material that is not needed in the near-term often results in disposal, due to expired shelf-life or deteriorated containers. The consequence of hazardous material disposal is the generation of hazardous waste, which becomes a liability, is costly, and environmentally unsound. Army guidance mandates improvement in hazardous material and hazardous waste control to reduce these risks.

## 3. Discussion:

a. AR 200-1 requires Garrison Commander's implement an installation-wide Hazardous Materials Management Program (HMMP) to ensure that applicable environmental requirements are incorporated into all procurement actions. Army policy

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requires review and approval for all HM procurements made outside the Standard Army Retail Supply System (SARSS). Hazardous materials usage is tracked in every process at every work center. The acquisition and use of HMs and the generation of solid or hazardous wastes (HW) are to be reduced through centralized inventory control, best management practices (BMPs), pollution prevention actions, improved procurement practices, material re-use, recycling, and enhanced shelf-life management. HMs should be procured through the standard Army supply system.

- b. HQDA EXORD 181-21 directs the Army transition to use of EESOH-MIS for HM authorization, tracking, and reporting at all levels in which HM is procured, stored, and used on Army installations. The intend of the implementation of EESOH-MIS and institution of an HMCP is to minimize, control, and track HM throughout its life cycle using a single control point and using a standardized tracking system.
- c. AMC OPORD 21-185 directs the Army activities assigned to a joint base will follow HM management requirements established by the lead military service that commands the joint base. Supported components and tenants assigned to an Armyled Joint Base will comply with the host installation HMMP and the use of EESOH-MIS.

## 4. HMMP Policy Requirements.

- a. All hazardous material shall, to the maximum extent possible, be procured through the standard Army enterprise systems, such as Global Combat Support System-Army (GCSS-A) and shall be tracked within EESOH-MIS.
- b. The purchase of hazardous material with the Government Purchase Card (GPC) is generally prohibited, except for the procedure outlined in the USAG Humphreys HMMP.
- c. Hazardous materials procured must be coordinated through the Hazardous Material Control Point (HMCP) for EESOH-MIS inventory control and bar coding. The owing unit has the responsibility of ensuring all hazardous material inventories are included into EESOH-MIS.
- d. All hazardous material must be approved by the USAG Humphreys HMMP Working Group. Approved HM must be listed on an Authorized User List (AUL) in EESOH-MIS prior to ordering.
- e. Direct charge or reimbursement will be sought from all tenants who through negligence and/or mismanagement of the supply requisitioning process, accumulate excess quantities of expired hazardous materials.

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- f. The HMCP as organized in EESOH-MIS and outlined in the USAG Humphreys HMMP is the centralized receiving and issuing point for all hazardous materials.
- 5. This policy applies to all military organizations and agencies, assigned to or attached, and tenants on USAG Humphreys that procure hazardous material.
- 6. The proponent of this policy is the Environmental Division, Directorate of Public Works, USAG Humphreys at (315) 756-1050.

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