



DEPARTMENT OF THE ARMY
U.S. ARMY ABERDEEN PROVING GROUND
ABERDEEN PROVING GROUND, MARYLAND 21005-5001

REPLY TO
ATTENTION OF

AMSSB-DIC

13 APR 2004

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Hazardous Materials Management Policy

1. This policy supercedes the Hazardous Materials Management Policy and Call for Inventory Reduction Strategies, 24 Oct 00, and fulfills the requirements of the following references:

- a. 29 CFR 1910.1200, Hazard Communication Standard, 2001;
- b. Executive Order 13148, Greening the Government Through Leadership in Environmental Management, 2000;
- c. Aberdeen Proving Ground Regulation (APGR) 385-4, APG Safety and Occupational Health Program, 2000;
- d. Aberdeen Proving Ground Pollution Prevention Plan, 2000;
- e. Executive Order 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition, 1998;
- f. Army Regulation 700-141, Hazardous Materials Information System, 1997;
- g. The Pollution Prevention Act (PPA), 1990;
- h. The Emergency Planning & Community Right-To-Know Act (EPCRA), 1986; and
- i. The Resource Conservation and Recovery Act (RCRA), 1976.

2. A hazardous material is any substance that can damage health, harm the environment, and/or pose a physical hazard. Pollution prevention is the preferred approach to environmental management at Aberdeen Proving Ground (APG). The Installation is committed to reducing/eliminating the use of hazardous materials whenever feasible. The following practices apply to the receipt, distribution, storage, and use of all hazardous materials at APG.

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- a. Any product composed of or containing hazardous materials should be accompanied by a material safety data sheet (MSDS).
 - b. Hazardous materials are used only when their use cannot be avoided through alternative work methods, or by using less hazardous or nonhazardous substitutes.
 - c. When planning for the purchase and use of hazardous materials, only the quantities needed are ordered.
 - d. Hazardous materials are handled properly by all activities to reduce the potential for adverse affects to health and the environment.
 - e. When hazardous materials must be used, they must be properly tracked and handled to protect workers, monitor usage and reductions, and ensure compliance with applicable regulations.
3. In order to meet federal, state, and local hazardous materials reduction goals and rigorous reporting requirements, APG maintains an automated inventory using the Hazardous Inventory Tracking System (HITS). Barcode numbers are assigned to containers of hazardous materials and items are tracked from receipt through use and final disposition. All activities shall work with the Installation HAZMART (hazardous materials pharmacy) to maintain an accurate, up-to-date hazardous materials inventory.
4. The Installation Hazardous Materials Management Procedures Manual (HMMP) (encl 1) specifies the requirements for inventory management and tracking using HITS.
5. Each garrison and tenant activity is required to develop and implement an HMMP. Each activity's HMMP shall be at least as stringent in its requirements as the Installation HMMP and shall specify how it will achieve each of the following actions.
- a. Review and approve all orders of hazardous materials, ensuring that only necessary materials and quantities are ordered.
 - b. Determine whether work processes can be changed or products replaced by safer alternatives, such as the environmentally preferred products offered through the General Services Administration.
 - c. Integrate appropriate procedures, processes, and/or alternatives presented in comprehensive pollution prevention opportunity assessments (PPOAs), which are a part of the APG Pollution Prevention Plan.

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d. Ensure that hazardous materials inventory data (e.g., transfers, MSDSs) are expeditiously entered into HITS at least once a week.

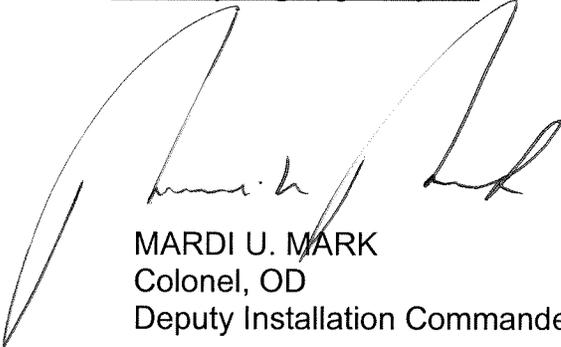
6. An activity may use any or all of the options listed in the Installation HMMP. An activity's HMMP can be as simple as a memo indicating it will comply with the Installation HMMP, or the activity can incorporate additional activity-specific requirements. In either case, the activity shall submit its plan in writing to the Directorate of Safety, Health and Environment, AMSSB-GSH-E no later than 45 days from the date of this memorandum.

7. All government contractors are required to comply with the APG Environmental Protection – 01561, Section 5 specifications (enclosure 2), which mirror to a large extent the requirements outlined in this policy and accompanying HMMP.

8. The point of contact for this matter is Mr. Robert Solyan, Pollution Prevention Program Manager. He can be reached at bob.solyan@apg.army.mil, 410-306-2275.

FOR THE COMMANDER:

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MARDI U. MARK
Colonel, OD
Deputy Installation Commander

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