

CHAPTER 3

POLLUTION PREVENTION

3-1 Scope

a. This chapter provides pollution prevention policies and procedures applicable to all Navy shore facility operations in the United States, including the applicable requirements of Executive Order (E.O.) 12856 of 3 August 1993, which mandates Federal facility compliance with the Pollution Prevention Act. Although E.O. 12856 does not apply to Federal facilities outside the customs territory of the United States, the Navy will fully comply with it and all related Navy and Department of Defense (DOD) policy on Guam.

R) b. Chapter 19 discusses pollution prevention for ships. Chapter 2 discusses pollution prevention in National Environmental Policy Act (NEPA) actions. Chapter 14 discusses the Navy Qualified Recycling Program (QRP), solid waste pollution prevention, solid waste reduction, and affirmative procurement for shore activities.

3-1.1 References. Relevant references are:

a. 40 CFR 355, Regulations for Emergency Planning and Notification Under CERCLA;

b. 49 CFR 173, Shippers - General Requirements for Shipments and Packaging;

c. 29 CFR 1910.1200, OSHA Hazard Communication Standard;

d. 40 CFR 261, Identification and Listing of Hazardous Waste;

e. 40 CFR 302, EPA Designation, Reportable Quantities and Notification Requirements for Hazardous Substances under CERCLA;

f. 40 CFR 372, Toxic Chemical Release Reporting, Regulations;

g. DOD Directive 4210.15 of 27 July 1989, Hazardous Material Pollution Prevention (NOTAL);

h. DOD Instruction 4715.4 of 18 June 1996, Pollution Prevention (NOTAL);

i. NAVSUPINST 4410.52B of 14 November 1992, Shelf Life Item, Identification, Management and Control (NOTAL);

j. OPNAVINST 5100.23D, Navy Occupational Safety and Health (NAVOSH) Program Manual, (NOTAL).

3-2 Legislation

3-2.1 Pollution Prevention Act of 1990.

This Act establishes the national policy that "pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner, whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner."

3-2.2 Resource Conservation and Recovery Act (RCRA).

RCRA requires the cradle-to-grave management of hazardous waste (HW). The Act also encourages the beneficial reuse of solid waste through recycling and reuse as an energy source. The 1984 RCRA amendments require HW generators and treatment, storage, and disposal (TSD) facility owners to certify that

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the generator has a program in place to “reduce the volume or quantity and toxicity” of waste and that the TSD method minimizes the threat to health and the environment. In addition, the Act requires that generators report the changes in volume and toxicity of waste actually achieved during the year of the report (in comparison to previous years).

3-3 Terms and Definitions

3-3.1 Authorized Use List (AUL). The list of all hazardous material (HM) needed to support the requirements of a command or facility.

3-3.2 Consolidated Hazardous Material Reutilization and Inventory Management Program (CHRIMP). CHRIMP is a successful methodology to achieve life cycle hazardous material control and management (HMC&M) and pollution prevention at the command and facility levels. The Navy CHRIMP manual provides a standardized approach and guidance for the development and implementation of centralized HMC&M practices that result in a reduction of HM procured, stocked, distributed, and eventually disposed of as waste.

3-3.3 Extremely Hazardous Substance (EHS). Any substance listed in Appendices A and B of reference (a).

3-3.4 Hazardous Inventory Control System (HICS). An automated product tracking and inventory system designed to facilitate the CHRIMP process on board Navy ships.

3-3.5 Hazardous Material (HM). In general, HM is any material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment. This definition includes all extremely hazardous substances, hazardous chemicals, hazardous substances, and toxic chemicals. HM is any material *regulated as HM*, per reference (b), or any mate-

rial that requires a material safety data sheet (MSDS), per reference (c). HM is also any material having components which meet or have potential to meet the definition of HW per reference (d), subparts A, B, C, and D, during any phase of its existence: end use, treatment, handling, packaging, storage, transportation, or disposal.

Designation of a material by this definition, when separately regulated or controlled by other instructions or directives, does not eliminate the need for adherence to hazard-specific guidance, which for control purposes, takes precedence over this instruction. Such materials include ammunition, weapons, explosives and explosive-actuated devices, propellants, pyrotechnics, chemical and biological warfare materials, medical and pharmaceutical materials, medical waste and infectious materials, bulk fuels, radioactive materials, and other materials such as asbestos and mercury. Consider these materials hazardous to the extent that personnel exposure may occur during manufacture, storage, use, and demilitarization of these items.

3-3.6 Hazardous Substance (HS). Any substance listed in Table 302.4 of reference (e).

3-3.7 Hazardous Substance Management System (HSMS). HSMS is an automated chemical tracking system providing “cradle-to-grave” tracking not only of the hazardous material used at a facility, but also the chemical constituents of those materials. The system facilitates Emergency Planning and Community Right-to-Know Act (EPCRA) reporting to comply with E.O. 12856. The system also provides naval activities with a tool to analyze the flow of hazardous material while developing sound pollution prevention management techniques that (1) reduce the amount of hazardous material procured and used and (2) reduce the amount that becomes waste. (A

3-3.8 Hazardous Waste. A solid waste, or combination of solid wastes, which because of

quantity, concentration, or physical, chemical or infectious characteristics may:

- a. Cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness.
- b. Pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of or otherwise managed.

Note: State regulations may be more stringent and take precedence over Federal regulations.

3-3.9 Pollution/Pollutants. Gaseous, liquid or solid by-products of industrial, agricultural or even natural processes, which after recycling, treatment, or other mitigating processes, still produce undesirable environmental effects.

3-3.10 Pollution Prevention (P2). Source reduction and other practices that reduce or eliminate the creation of pollutants through:

- a. Increased efficiency in the use of raw materials, energy, water, or other resources.
- b. Protection of natural resources by conservation.

Examples of pollution prevention techniques include:

- a. Input substitution
- b. Product reformulation
- c. Process redesign
- d. Process modification
- e. Improved operation and maintenance
- f. Integrated recycling.

3-3.11 Pollution Prevention Equipment Program. A program to produce and provide commercially available pollution prevention equipment for Navy activities and to procure, demonstrate, and evaluate new technologies for verification of potential Navy-wide application.

3-3.12 Recycled Material. Previously used materials that can be used in place of a raw or source material in the manufacturing process. If not so used, this material would become waste.

3-3.13 Recycling. Using, reusing, or reclaiming materials, including processes that regenerate a material or recover a usable product from it.

3-3.14 Source Reduction. Any practice which:

- a. Reduces the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, and disposal.
- b. Reduces the hazards to public health and the environment associated with the release of such substances, pollutants, or contaminants.

The term includes equipment or technology modifications, process or procedure modifications, reformulation or redesign of products, substitution of raw materials, and improvements in housekeeping, maintenance, training, or inventory control.

3-3.15 Toxic Chemical. Any substance listed in reference (f).

3-3.16 Toxic Chemical Use Reduction. Pollution prevention actions to reduce, avoid, or eliminate the use of toxic chemicals.

3-3.17 Toxic Chemical Use Substitution. Pollution prevention actions to substitute non-toxic or less toxic chemicals in maintenance/operations/industrial processes.

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3-3.18 Used/Excess HM. HM for which there is no further, immediate use aboard the ship or at the shore facility possessing the material. Such material may ultimately be used on another ship, at another shore facility, or by commercial industry for purposes other than those for which it was initially manufactured.

3-3.19 Waste. See "Pollution/Pollutants."

3-3.20 Waste Minimization. Source reduction and the following types of recycling:

- a. Beneficial use/reuse
- b. Reclamation.

Waste minimization does not include disposal or burning for energy recovery.

3-3.21 Waste Reduction. See "Waste Minimization."

3-4 Requirements

3-4.1 Pollution Prevention Policy for Federal Agencies.

a. E.O. 12856 requires DOD facilities and acquisition activities to practice source reduction to expeditiously reduce the quantity of toxic chemicals entering any waste stream (including releases to the environment). Activities must recycle any waste generated to the maximum extent practicable and store, treat, or dispose of any waste remaining in a manner that protects public health and the environment.

b. DOD was required to develop voluntary goals to reduce their total releases of toxic chemicals to the environment and off-site transfers of such toxic chemicals for treatment and disposal from covered facilities by 3 August 1994. DOD must achieve a 50 percent reduction by 31 December 1999, using 1994 releases and off-site transfers as a baseline. To the maximum

extent practicable, such reductions will be achieved by implementation of source reduction practices.

The amount to which the 50 percent reduction goal applies will be the aggregate amount of toxic chemicals released as reported per reference (f) (see paragraph 3-5.1 and Chapter 4).

Each Navy facility not scheduled for operational closure by 31 December 1997 must have developed a written Pollution Prevention Plan that sets forth the facility's contribution to the 50 percent goal. Navy will conduct assessments of its facilities, as necessary, to ensure development of such plans and of the facilities' Pollution Prevention Programs and required updates.

c. Navy has established a plan and goals for eliminating or reducing the unnecessary acquisition of products containing extremely hazardous substances or toxic chemicals. Similarly, Navy has established a plan and goals for voluntarily reducing its own manufacturing, processing, and use of extremely hazardous substances and toxic chemicals.

Navy has reviewed its standardized documents, including specifications and standards, and identified opportunities to eliminate or reduce its use of extremely hazardous substances and toxic chemicals, consistent with the safety and reliability requirements of its mission. By the end of CY 1999, Navy will eliminate, as feasible, the use of extremely hazardous substances and toxic chemicals.

3-4.2 Environmental Protection Agency (EPA) Pollution Prevention Policy. In 1992, the EPA established an environmental waste management policy based on the following hierarchy:

- a. Source Reduction
- b. Recycling

- c. Treatment
- d. Disposal.

In establishing this hierarchy, the EPA states that the criteria for selecting the method of waste management depend upon the requirements of the applicable law, the level of achievable risk reduction, and the cost-effectiveness of the option. The hierarchy establishes that source reduction is always the most desirable option as it addresses reducing the volume and toxicity of pollution versus simply transferring it from one medium to another. EPA observed that drawing an absolute line between source reduction and recycling is difficult. Source reduction generally includes "in-process recycling" or "reuse," but not "out-of-process recycling."

In summary, EPA looks to pollution prevention as a key to reducing the increasing cost of treatment and cleanup of environmental pollutants.

3-4.3 DOD HM Pollution Prevention. References (g) and (h) establish policy, assign responsibilities, and prescribe procedures for HM pollution prevention.

These documents require that DOD select, use and manage HM over its life cycle so that DOD incurs the lowest cost required to protect human health and the environment. It establishes the preferred method of doing this as avoiding or reducing the use of HM. Where an activity cannot avoid the use of an HM, the directive requires it to follow regulations regarding use and employment of management practices that avoid harm to human health and the environment. These documents require placing emphasis on using less HM in processes and products, as distinguished from end-of-pipe management of HW.

To implement this policy, the Navy shall:

- a. Modify functional area efforts, procedures, guidance documents, or common practices

to improve the management of pollution prevention.

- b. Revise documents, processes, or procedures to facilitate the use of substitutes, where possible.

- c. Evaluate pollution prevention decisions by economic analysis techniques that match the magnitude of the decision being made, considering cost factors and intangible factors, as applicable.

- d. Begin economic analyses of pollution prevention decisions at the earliest possible stage of the life cycle and modify analyses when better information becomes available.

- e. Record, retain, and provide to appropriate authorities, as necessary, information that describes actions taken on pollution prevention issues and the effect of the actions on the conduct of operations.

3.5 Navy Policy

The Navy shall take action to prevent pollution and to decrease the release of pollutants into the environment.

3-5.1 Pollution Reduction. All Navy facilities not scheduled for operational closure by 31 December 1997 shall take action to reduce releases of toxic chemicals to the environment and off-site transfer of such toxic chemicals for treatment and disposal. The Navy goal is to reduce such releases and offsite transfers by at least 50 percent by 31 December 1999. Appendix G provides additional pollution prevention measures of merit (MOMs) such as hazardous waste reduction, solid waste reduction, and recycling. Navy facilities should review and incorporate MOMs into their pollution prevention plans.

3-5.2 Pollution Prevention Practices. Navy facilities shall reduce the amount of HM used,

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and HW generated, by up-front HM control in procurement, supply, and use. Navy facilities shall accomplish this by:

- a. Developing local mechanisms at shore facilities to identify materials in use that are hazardous and limiting quantities of HM procured and stored. Facilities shall establish HM AULs to control the quantity of HM procured and stored.
- A) b. Implementing CHRIMP to reduce the amount of procured, stocked, and distributed HM eventually disposed of as waste.
- c. Establishing methods for substituting less HM or non-HM where possible.
- d. Developing and incorporating new technology or materials which have a reduced impact upon the environment, are safer and healthier, or result in reduced emissions.
- e. Modifying HM shelf life to reduce the generation of waste as a result of shelf life expiration, when possible.
- f. Modifying units of issue to reduce the generation of waste as a result of unused surplus material.
- R) g. Establishing a plan to review local documentation that directs the use of HM to determine the needed changes to further minimize the use of HM and the possible generation of HW.

3-5.3 Training. One of the most effective pollution prevention techniques is to properly train personnel on those job functions that have an environmental impact. Chapter 24 provides overall environmental training requirements. Individual chapters of this manual discuss the training necessary to achieve compliance with environmental laws and regulations.

3-5.4 Pollution Prevention Plans. Every facility not scheduled for operational closure by 31 December 1997 shall develop and implement a Pollution Prevention Plan. In it, facilities shall address the actions required to reduce pollution from all sources and to all media. They shall incorporate the following elements in the facility Pollution Prevention Plans:

- a. Purpose
 - (1) Identify major processes that use toxic or hazardous chemicals or generate hazardous waste.
 - (2) Develop technically and economically feasible options for reducing use of toxic or hazardous chemicals and off-site transfers of hazardous waste.
 - (3) Identify methods and mechanisms for complying with DOD and DON instructions and directives and Federal, State and local laws and regulations using pollution prevention as a tool.
- b. Policy Statement. Provide clear statement of authority, roles and responsibilities for pollution prevention efforts.
- c. Applicability and Scope
 - (1) Define installation activities included in pollution prevention plan.
 - (2) Identify which installation activities are subject to EPCRA Section 313 (TRI reporting requirements).
- d. Description of Shore Facility.
- e. Plan Management and Administrative Elements.
 - (1) Provide methods and schedule for updating P2 plan.

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(2) Provide methods for measuring and reporting progress.

(3) Provide P2 training plan and techniques for achieving awareness.

(4) Provide HM management and control practices and procedures.

f. Planned Process-specific Improvements. Summarize process specific methodologies and procedures intended for use in meeting goals of the installation P2 plan.

g. Establish priorities. Provide priorities for implementing administrative, managerial and process improvements required to meet P2 plan goals .

h. Potential Barriers. Discuss any barriers to accomplishing P2 plan improvements, including funding, approval process, and document changes.

i. Other Requirements. Identify related requirements that impact P2 plan execution such as Solid Waste Management Plan, ODS Conversion Plan, and any local P2 requirements.

j. Commanding Officer Approval and Certification.

Every Navy facility should already have an HMC&M plan, a hazardous waste minimization (HAZMIN) plan, and a storm water pollution plan. Facilities should incorporate these plans and any others (i.e., a solid waste management plan, an ozone depleting substances phase-out plan) they have into an activity Pollution Prevention Plan. Facilities shall use their Pollution Prevention Plans as a primary tool for identifying methods and means to achieve compliance with environmental laws and regulations, enhance personnel safety, and to reduce HM use, HW generation, and toxic chemical releases. Facilities

should use plans in developing and justifying funding requirements for compliance with applicable regulations and to meet Navy requirements of reducing pollution as described in paragraph 3-5.1. As the guiding document for a facility P2 program, facilities should update the Pollution Prevention Plan on a regular basis, not less than annually, as installation requirements, priorities, and missions change. Installation pollution prevention plans should be made readily available to the public. The means by which this public access is provided may vary widely from installation to installation, but availability only through FOIA requests is not recommended.

3-6 Responsibilities

3-6.1 The Chief of Naval Operations (CNO (N45)) shall: (R

a. Develop and implement Navy pollution prevention policy including implementation of applicable E.O. 12856 and E.O. 12873 requirements (see Chapter 14).

b. Develop and implement policy regarding the use of CHRIMP/ HSMS at facilities and CHRIMP/HICS on ships.

c. Identify Navy opportunities for pollution prevention and facilitate transfer of pollution prevention technology.

d. Provide guidance for use by facilities in the development of Pollution Prevention Plans.

e. Develop and maintain an up-to-date pollution prevention technology transfer data base usable by facilities in accomplishment of pollution prevention goals.

f. Act as the resource and assessment sponsor for the development of pollution prevention technology and as the assessment sponsor for accomplishing implementation of pollution prevention efforts at Navy facilities.

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- A) g. Act as the resource and assessment sponsor for the development and maintenance of the HICS program.
- A) h. Act as the resource and assessment sponsor for the initial implementation of HSMS and HICS at facilities and on ships, respectively.
- A) i. Coordinate with Navy Program Sponsors to ensure that Navy acquisition efforts are fully compliant with environmental laws and policies through all phases of the acquisition process including R&D, design, manufacturing, and ultimate disposal.

j. Actively participate with industry and other Services through joint initiatives to eliminate or reduce shared HM procurement, use, and requirements.

3-6.2 Commander Naval Supply Systems Command (COMNAVSUPSYSCOM) shall:

- a. Assist CNO (N45) in managing the HM aspects of the Navy pollution prevention effort and serve as the overall manager for the supply aspects of the Pollution Prevention Program.
- b. Develop, implement, and maintain a Navy-wide system for acquiring only authorized HM, integrating command and shore facility HM AULs.
- c. When requested, assist system command program managers by providing life cycle^{A)} costs for HM being considered for acquired systems.
- d. Review HM shelf life policies and determine the validity of shelf lives and/or unit of issue requirements. Review Defense Reutilization and Marketing Service records for HM ex-A) cess due to shelf life expiration. Initiate appropriate changes to logistic planning factors, units of issue, and shelf life extension practices, as

appropriate, to reduce HM excesses consistent with reference (i).

e. Provide guidance to and coordinate efforts of the Navy-wide HM substitution efforts.

f. Establish methods to reduce or minimize the entry of new HM into the supply system. Before the introduction of new HM into the system, a valid requirement for the HM must exist; a complete MSDS must be locally available per reference (k); and a review must confirm that existing non hazardous or less hazardous substitutes are not available.

g. Provide Navy guidance for shore facilities and ships on implementing CHRIMP.

h. Provide guidance to facility level supply functions in establishing and managing local shelf life control and management programs (see paragraph 3-5.2).

i. Develop and maintain Navy-wide HM/HW tracking systems (HSMS for shore activities and HICS for ships) in support of CHRIMP and to implement E.O. 12856. (A)

j. Provide initial assistance and computer equipment to implement CHRIMP and HICS on ships to the point the ship has acquired sufficient control over a portion of their HM/HW in an operational HICS environment to sustain the operation of HICS on their ship. (A)

k. Provide initial assistance and computer equipment to implement CHRIMP and HSMS at shore facilities to the point a facility has acquired sufficient control over a portion of their HM/HW in an operational HSMS environment to sustain the operation of HSMS at their facility.

l. Develop and implement a Regional Hazardous Material Management System (RHMMS) to ensure that Fleet and Industrial Supply Centers (FISCs) do not declare usable

excess HM as excess or waste and, instead, make it available to other FISCs or activities requiring it. The aim is to reduce both waste disposal costs and additional procurement costs.

- A) m. Represent Navy interests in all HSMS software development efforts.
- A) n. Serve as lead systems command for coordinating, planning and implementing the review and revision of Navy standardized documents to eliminate or reduce the use of extremely hazardous materials and toxic substances.

3-6.3 Commander Naval Facilities Engineering Command (COMNAVFACENG-COM) shall:

- a. Support pollution prevention initiatives as tasked by CNO (N45).
- b. Assist CNO (N45) in managing the pollution prevention technology transfer data base.
- R) c. Serve as financial manager in support of the Pollution Prevention Equipment Procurement Program.
- d. Provide technical assistance to shore facilities, to implement pollution prevention practices and incorporate pollution prevention technology into facility processes.
- e. Develop plans for implementing the use of alternative fuel vehicles in Navy vehicle fleets.
- A) f. Assist COMNAVSUPSYSCOM in preparing activities to receive HSMS and assist activities in the continuous use of this system.
- A) g. Designate the Naval Facilities Engineering Service Center (NFESC) as the central repository for all Navy Installation P2 Plans.
- A) h. Review Installation Pollution Prevention Plans for completeness and provide assistance to

major claimants on opportunities identified in the P2 Plans.

3-6.4 Regional Environmental Coordinators (RECs) shall:

- a. Assist CNO (N45) and COMNAVSUPSYSCOM in planning and preparation for CHRIMP and HSMS implementation.
- b. Coordinate implementation efforts within their regions and serve as a point of contact for activities in managing and prioritizing implementation.
- c. Serve as regional point of contact and coordinator for regional-scale pollution prevention initiatives.

3-6.5 Major claimants shall:

- a. Ensure that facilities under their command develop, implement and forward copies of their Pollution Prevention Plans per the guidance of this chapter. (R)
- b. Ensure that activities under their cognizance update their P2 Plans annually. (R)
- c. Ensure that activities under their cognizance provide a copy of the Installation P2 Plan to NFESC, and copies of all revisions to the P2 Plan by the end of each calendar year. (R)
- d. Program, budget, and allocate funds for all facility pollution prevention projects identified in facility Pollution Prevention Plans with pay-back periods of 3 years or less. (R)
- e. Program, budget, and allocate funds for implementing CHRIMP at shore activities and on ships.
- f. Program, budget and allocate funds to facilitate the implementation of HSMS at shore facilities.

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- R) g. Assist COMNAVSUPSYSCOM in implementing CHRIMP/HICS on ships and CHRIMP/HSMS at shore facilities.
- A) h. Develop and implement HM elimination or substitution processes for all systems and operations under their cognizance. These processes shall include the identification, evaluation, and use of the least hazardous material available.
- A) i. Develop processes to ensure that the facility AUL incorporates the least hazardous technically acceptable materials.
 - j. Establish the contributions of each of their facilities (which meet the threshold reporting requirements of EPCRA Section 313 (see Chapter 4)) for the reduction in releases of toxic chemicals and the off-site transfer of toxic chemicals. Each claimancy shall reduce such releases and off-site transfers by at least 50 percent by the end of calendar year (CY) 1999, using CY 1994 as a baseline.
- A) k. Work with program managers to aggressively pursue reduction of HM use in all systems.
- A) l. Incorporate Environment, Safety and Occupational Health (ESOH) into the system engineering process using system safety engineering principles and practices.
- A) m. Assess ESOH effects of chemicals, processes and materials posing a high hazard potential. Use the results in all life cycle cost and trade-off decisions.
 - n. Fund ESOH initiatives within the existing system program elements according to the planning, programming and budgeting system (PPBS).

3-6.6 The Chief of Naval Education and Training (CNET) shall incorporate pollution prevention practices into Navy training, including

source reduction initiatives in appropriate training courses.

3-6.7 Commanders and commanding officers of shore facilities shall:

- a. Develop and implement a facility Pollution Prevention Program that incorporates the HMC&M and hazard communication requirements of reference (j). Appendix G provides guidance for developing facility Pollution Prevention Programs. Tab A to Appendix G provides guidance for establishing a facility pollution prevention committee.
- b. Develop and implement a facility Pollution Prevention Plan per paragraph 3-5.4. In this plan the facility shall address the actions required for reducing pollution from all sources and to all media and for meeting the facility's contribution to their major claimant's toxic chemical release reduction requirement. The facility shall also identify for the major claimant all projects that have a payback period of less than 3 years and shall identify funding requirements for those projects in the plan. Facilities shall use their pollution prevention plans as a primary tool for identifying the methods and means to reduce HM use, HW generation and toxic chemical releases. Facilities were to complete plans by 31 December 1995. Facilities shall update plans on a regular basis as activity requirements, priorities, and missions change.
- c. Establish or revise, as necessary, and implement procedures to control, track, and reduce the variety and quantities of HM in use, in storage or stock, or disposed of as HW per the Navy CHRIMP manual. This includes establishing HAZMINCENs to facilitate the central management of all HM at a facility.
- d. Implement HSMS at the facility. This includes identifying an MSDS, industrial type process, and EPA waste stream for each manufacturer-specific HM used within the facility. It

also includes adapting previously developed process algorithms or developing new ones for each of the identified processes.

e. Develop or revise, as necessary, and implement a facility level HM AUL using an inventory that identifies and quantifies HM, including whether the material is an extremely hazardous substance, hazardous substance, or toxic chemical as defined under EPCRA (see Chapter 4).

f. Limit local purchases of HM to purchases for which a stock numbered product is unavailable from the supply system and for which there is a valid controlling document (e.g.,

maintenance requirement card (MRC), maintenance requirement plan (MRP), technical manual, technical order, maintenance manual, or similar document). Make and control local purchases through the HAZMINCEN according to CHRIMP principles of HM management and adhere to the same requirements as any other HM stock procurement. In cases where a standard stock item appears inferior, provide complete information regarding the item to the supply officer who can then submit an HM AUL feedback report to document the apparent deficiency.

g. Ensure facility level supply functions establish and implement a local shelf life control and management program.