



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, UNITED STATES ARMY GARRISON, RED CLOUD AND AREA I
UNIT #15707
APO AP 96258-5707

REPLY TO
ATTENTION OF:

Policy Letter # 6 – 17

IMRD-ZA

27 AUG 2014

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Water Pollution Management Program for Maintenance Facilities

1. References:

- a. AR 200-1, Environmental Protection and Enhancement, 13 December 2007.
- b. USFK Reg 201-1, Environmental Governing Standards, 18 June 2012.
- c. Field Manual 3-34.5, Environmental Consideration, February 2010.

2. Applicability: This policy applies to all staffs, directorate, units, tenant offices, contractors, and other organizations within USAG Red Cloud and Area I.

3. Purpose: The purpose of this policy is to reduce water pollution from ground and aviation maintenance facilities located at USAG Red Cloud and Area I. This policy establishes guidelines which will help maintain the chemical, physical, and biological Integrity of point and non-point water sources by integrating concepts designed to prevent, reduce, and eliminate pollution.

4. Objective: The objective of this policy is to prevent contaminants, such as petroleum products, cleaning compounds, solvents, and sediments from being discharged onto the land or into adjacent streams. This policy establishes specific procedures and responsibilities for the operation of ground and aviation maintenance facilities to ensure that only the qualified of water is being discharged, thereby keeping pollution to an absolute minimum.

5. Responsibilities:

a. Directorate of Public Works (DPW) Environmental Division will:

(1) Conduct semi-annual inspections of maintenance facilities and areas to determine compliance with the environmental rules, regulations, standards, and this policy.

(2) Advise and provide guidance in the operation of water pollution abatement equipment (oil/water separators, gate valves, skimmers, etc).

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(3) Conduct training in proper controls and procedures for abatement.

(4) Coordinate the removal, transportation, and disposal of used petroleum, oils, and lubricant (POL) products and hazardous waste. This may be performed by contract or through in-house assets.

(5) Coordinate the maintenance of water pollution abatement equipment to include periodic cleaning and sediment removal from oil/water separators.

b. Unit Commanders and Organization Supervisors will:

(1) Assign a primary and alternate unit or organizational Environmental Officer (EO).

(2) Ensure personnel assigned duties as primary and alternate EOs receive training within three (3) months after appointment.

(3) Implement this policy and correct identified deficiencies.

(4) Provide an EO to accompany the Environmental Division personnel during environmental inspections.

(5) Notify the USAG Red Cloud and Area I DPW Environmental Division immediately when someone other than the Unit/Organization EO or USAG Red Cloud and Area I DPW Environmental Division personnel conducts an environmental inspection of any facility within area of responsibility and operation. This will include, but not limited to Command Inspections, Local National Governmental Officials, US Forces Korea, Eighth US Army, etc.

c. Unit and Organizational Primary and Alternate EO will:

(1) Report the malfunction any water pollution abatement equipment utilizing DPW, Maintenance Service Order (MSO) procedures.

(2) Immediately call 911 to report the release or spill of POL in accordance with the following:

(a) A release of 10 gallons or greater of POL product.

(b) Any amount of POL that has reached any surface water, to include storm drains, storm ditches, catch basins, streams, rivers, etc. or permeates the soil.

(c) Any amount of POL that has flowed off-post or occur off the installation.

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(d) Spills that occur after duty hours, weekends, or holidays.

(e) If in doubt, notify and report.

(3) Cleanup any spill or release of a non-waterborne release or spill of a POL product as directed by the USAG Red Cloud and Area I DPW Environmental Division, Fire Department, or Incident Response Commander of all other releases or spills.

(4) Report and coordinate the disposal of hazardous wastes with the USAG Red Cloud and Area I DPW Environmental Division.

(5) Coordinate the removal of used and waste POL with the USAG Red Cloud and Area I DPW Environmental Division and HAZMART.

(6) Perform unit or organizational maintenance of water pollution abatement equipment to include the following:

(a) Clean wash rack, washing pads, and drainage trenches.

(b) Dispose of trash in proper designated trash collection container or dumpster.

(c) Remove all sediments from the drainage trenches and coordinate with USAG Red Cloud and Area I DPW Environmental Division for disposal at the Contaminated Soil Bioremediation Facility (Land Farm). DO NOT dispose of any contaminated soil, suspected contaminated soil, or absorbent material in any solid waste disposal receptacle (dumpsters, trashcans, drums, etc).

(d) Keep trash and debris from clogging grates and drain pipes.

(e) Keep covers on used oil storage containers.

(f) Cleanup spilled POL.

(g) Keep trash and other debris out of Oil/Water Separators (OWS).

(h) Submit a Maintenance Service Order (MSO) to DPW for any malfunction with installed equipment and fixtures (leaking faucets, unscheduled power outage, etc).

(i) Keep dumpster lids closed at all times except when depositing or removing refuse.

(7) Conduct periodic inspections of maintenance facilities and areas to determine compliance with environmental laws, regulations, standards, and this policy.

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(8) Ensure environmental training is placed on the unit and organizational training schedule and conducted at least semi-annually. Coordinate with the USAG Red Cloud and Area I DPW Environmental Division for assistance with training preparation as needed. Additionally, it is recommended all inspections be documented on the unit training calendar.

(9) Manage service of all Aboveground Storage Tanks (AST). This will include, but is not limited to, ensuring the secondary containment drain valves are always kept closed, except when draining accumulated water after a rain event, submitting MSO for cracks and breaches in the secondary containment system, ensuring fuel is not placed in any tank permanently or temporarily taken out-of-service, etc.

6. Procedures:

a. General.

(1) Vehicle washing and steam cleaning operations will only be performed on wash racks with oil/water separators.

(2) Implement controls to prevent spills or releases caused by performing maintenance operations.

(3) Immediately cleanup spills of POL and hazardous materials. Absorbent materials must be applied to all POL products released to the ground immediately after release. Cleanup of the absorbent must be accomplished in a timely manner after release.

(4) Properly dispose of used POL and hazardous waste.

(5) Maintain a sufficient supply (enough to completely absorb a release of 10 gallons) of absorbent material stocked on-hand within the immediate vicinity of all areas where the threat of spill or release is imminent. Never flush a spill with water.

(6) Segregate new absorbent material from used. Mark containers used to store the absorbent materials appropriately (Used Dry Sweep, Clean Dry Sweep, etc).

(7) It is recommended that units and organizations use organic types of absorbents that can be treated at the USAG Red Cloud and Area I Contaminated Soil Bioremediation Facility (Land Farm). Absorbent pads, brooms, pillows, etc., should be used only in an emergency when no organic absorbent is available. Examples of organic absorbents include clay absorbents (dry sweep), sand, sawdust, etc.

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(8) Segregate new rags from used rags. DO NOT dispose of used rags in dumpsters or any other solid waste collection receptacle.

(9) All approved exceptions to any part of this policy will be available for inspection and will be presented upon request or displayed in a conspicuous location for anyone entering the facility to read. No exception to this policy is permanent and expires when the requestor leaves or after one year of the date on the Exception of Policy Approval.

b. Wash racks.

(1) Solvent or other unauthorized material will not be used to wash heavily soiled and/or oily maintenance bay floors. Clean up oil and fuel with dry sweep or rags only.

(2) Do not use portable steam cleaners or clean engines at wash racks. These activities cause the oil to suspend in the water and the separator to function improperly.

(3) Garbage, POL, debris, or contaminated materials will not be placed into or introduced into the wash rack (OWS) system. Garbage and other solid waste are to be disposed of in a dumpster or other authorized refuse collection receptacle and used POL is to be disposed of at the nearest used POL collection point.

(4) Obtain authorization from USAG Red Cloud and Area I DPW Environmental Division for cleaners used in washing activities.

(5) Units and organizations will not abuse the wash rack.

(a) Parking vehicles on curbs or back walls,

(b) Operating without grates installed,

(c) Leaving unused hoses lying on wash rack,

(d) Dumping POL into the OWS, and

(e) Operating when the OWS is in need of maintenance.

(6) Vehicle washing operations will cease immediately when maintenance crews or used POL removal contractor arrives to conduct maintenance or remove used POL.

(7) Environmental Division will immediately stop vehicle or aircraft wash operations if the exception to policy or written approval cannot be presented.

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c. Maintenance Bays.

(1) Conduct maintenance washing at the motor pool wash rack – not in the maintenance bay.

(2) Caution to prevent POL spills or releases in the bay is essential. Immediately clean up all spills or releases of any amount. Use of an absorbent material (an organic absorbent such as dry sweep is preferred) to clean up a spill or release. DO NOT wash spilled POL into floor drains, floor grates, or out of bay doors.

(3) No POL product (new or used) will be disposed of in an oil/water separator.

(4) Confine solvent use to solvent washing machines that meet the National Fire Prevention Association's safety regulation standards.

(5) Washing vehicles (including aircraft) inside maintenance bays and near the maintenance building, regardless of whether the facility is serviced by a functional oil/water separator, is strictly PROHIBITED.

(6) Maintain a sufficient supply (enough to completely absorb a release of 10 gallons) of absorbent material stocked on-hand within the immediate vicinity of all areas where the threat of spill or release is imminent. Never flush a spill with water.

(7) Segregate new absorbent material from used. Mark containers used to store the absorbent materials appropriately (Used Dry Sweep, Clean Dry Sweep, etc). Ensure all containers have lids and they are kept closed at all times, with the exception of adding or removing contents.

(8) It is recommended that units and organizations use organic types of absorbents that can be treated at the USAG Red Cloud and Area I Contaminated Soil Bioremediation Facility (Land Farm). Absorbent pads, brooms, pillows, etc., should be used only in an emergency when no organic absorbent is available. Examples of organic absorbents include clay absorbents (dry sweep), sand, sawdust, etc.

(9) Segregate new rags from used rags. DO NOT dispose of used rags in dumpsters or any other solid waste collection receptacle.

d. POL Storage and Dispensing Areas.

(1) Storage or dispensing of POL directly over or in close proximity to storm drains is prohibited. POL dispensing should be a minimum of 25 feet away from any storm drains, ditches, grated trenches, etc.

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(2) Drip pans are to be used at dispensing areas. Drip pans will be inspected after rain and serviced regularly to prevent overflow.

(3) Any spill or release must be cleaned up immediately. Cleaning a spill is accomplished by the use of an absorbent material (an organic absorbent is preferred).

(4) Maintain a sufficient supply (enough to completely absorb a release of 10-gallons) of absorbent material stocked on-hand within the immediate vicinity of all areas where the threat of spill or release is imminent. Never flush a spill with water.

(5) Segregate new absorbent material from used. Mark containers used to store the absorbent materials appropriately (i.e. Used Dry Sweep, Clean Dry Sweep, etc.). Ensure all containers have lids and they are kept closed at all times, with the exception of adding or removing contents.

(6) It is recommended that units and organizations use organic types of absorbents that can be treated at the USAG Red Cloud and Area I Contaminated Soil Bioremediation Facility (Land Farm). Absorbent pads, brooms, pillows, etc., should be used only in an emergency when no organic absorbent is available. Examples of organic absorbents include clay absorbents (dry sweep), sand, sawdust, etc.

e. Line.

(1) Vehicles will have adequate drip pans to collect leaking POL materials. Drip pans may be self-fabricated or procured. All drip pans are to be inspected and emptied after every rain event. Collected product will be transferred to the used POL facilities before drip pans fill and overflow. Implement spill and release procedures in accordance with paragraph 7c(3) in the event a drip pan with a POL and water mixture overflows.

(2) Any spill or release must be cleaned up immediately. Clean up of a spill is accomplished using an absorbent material (organic absorbent preferred).

(3) Maintain a sufficient supply (enough to completely absorb a release of 10-gallons) of absorbent material stocked on-hand within the immediate vicinity of all areas where the threat of spill or release is imminent. Never flush a spill with water.

(4) Segregate new absorbent material from used. Mark containers used to store the absorbent materials appropriately (i.e. Used Dry Sweep, Clean Dry Sweep, etc). Ensure all containers have lids and they are kept closed at all times, with the exception of adding or removing contents.

(5) It is recommended that units and organizations use organic types of absorbents that can be treated at the USAG-Red Cloud and Area I Contaminated Soil Bioremediation Facility (Land Farm). Absorbent pads, brooms, pillows, etc., should be

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used only in an emergency when no organic absorbent is available. Examples of organic absorbents include clay absorbents (dry sweep), sand, sawdust, etc.

(6) Segregate new rags from used rags. DO NOT dispose of used rags in dumpsters or any other solid waste collection receptacle.

(7) No maintenance, other than preventative maintenance checks and services (PMCS), will be performed on the line.

(8) DO NOT drain oil of any kind, antifreeze, or any other POL related fluid on the line. Perform these operations in the maintenance bay. No exception to this policy will be approved.

(9) Washing vehicles on the line is strictly PROHIBITED. No exception to this policy will be approved.

f. Compressed Gas Cylinders.

(1) Compressed gas from cylinders will not be used without reducing the pressure through a regulator that is designed for that purpose.

(2) Cylinder valves will be opened slowly to prevent a sudden discharge of gas.

(3) Compressed gas will not be used to dust off clothing or other objects.

(4) For safety purposes, all cylinders will always be considered full and corresponding care exercised.

(5) Full and empty cylinders will be stored separately and marked as "FULL" or "EMPTY" appropriately.

(6) Nonflammable gas cylinders will be stored a minimum of 20 feet from flammable gas cylinders.

(7) Cylinders will never be lifted by grasping the valve or valve protection cap.

(8) Cylinders will never be used near heat sources where temperatures in excess of 130° F may be encountered.

(9) Smoking is prohibited within 50 feet of compressed gas storage areas. "NO SMOKING" signs will be posted and visible from each accessible side of the storage area.

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7. Point of contact for this memorandum is Chief, Environmental Division, DPW, USAG Red Cloud and Area I at DSN 732-6537.



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