



DEPARTMENT OF THE ARMY
ASSISTANT SECRETARY OF THE ARMY
INSTALLATIONS, ENERGY AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON DC 20310-0110

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SAIE-ZA

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Open Burning (OB) of Certain Waste Material

1. References:

a. Department of Defense (DoD) Instruction (DoDI) 4140.62, Material Potentially Presenting an Explosive Hazard (MPPEH), effective August 20, 2015, with change 2 effective August 31, 2018.

b. Memorandum HQDA, SAIE-ESOH, 1 November 2018, subject: Open Burning (OB) of Waste Material.

2. This memorandum rescinds and replaces reference 1.b.

3. Background:

a. The Army has, for decades, sought to reduce its reliance on the use of open burning (OB) and open detonation (OD) of excess, obsolete, and unserviceable DoD military munitions (i.e., waste military munitions or WMM). As such, it has and continues to increase its use of resource recovery, wherever practicable. Additionally, the Army has developed, identified, and employs a variety of safe and sustainable contained technologies to treat certain WMM. The 2019 National Academies of Sciences' Committee on Alternatives for the Demilitarization of Conventional Munitions report recognized that, while the Army continues to evaluate emerging contained technologies for the treatment of WMM, the technologies available to date would not allow the Army to terminate its use of either OB or OD as a method for demilitarizing WMM.

b. Generally, Army installations conduct OB operations pursuant to a Resource Conservation and Recovery Act (RCRA) or Clean Air Act (CAA) permit. As a rule, OB should not be used to treat or dispose of non-munitions waste or certain explosive-contaminated waste material. This waste includes deteriorated office furniture and building debris. It also includes certain materials (e.g., plastic liners, cardboard and other packaging) associated with munitions-related functions (e.g., storage, production,

demilitarization) for which commercially available contained technologies or alternative means of treatment or disposal exist.

4. This memorandum:

a. Provides Army policy concerning the use of OB for the treatment or disposal of the types of material described in paragraph 3.b. At Army locations where an approved alternative disposal method exists for the treatment or disposal of such waste material, OB will not be used for its treatment or disposal. Waste material associated with munitions-related functions may require evaluation, in compliance with reference 1.a., before treatment or disposal to ensure it will not pose an explosive hazard if treated or disposed of through contained technologies or alternative means.

b. Directs Army installations that conduct OB operations to evaluate the types of materials, including waste materials that may contain explosive residues, being addressed by OB and reduce or eliminate the amount of waste materials being disposed of by OB. In this evaluation, installations should consider whether such wastes include: (1) the types of material described in paragraph 3.b.; (2) paper towels, filters, over garments (e.g., Tyvek disposable coveralls) and other personal protective equipment; (3) other materials (e.g., dewatering filter socks) used in support of munitions operations that may contain explosive residues, but do not pose an explosive hazard. Installations should also consider whether other materials (e.g., gaskets, plastics) may safely be removed from WMM prior to its demilitarization by OD.

c. Authorizes, in accordance with paragraph 2.5.c.(2) of reference 1.a., the use of expert knowledge to evaluate and identify the materials addressed in paragraphs 3.b. and 4.a. that do not pose an explosive hazard and which may be processed in the contained technology procured to comply with paragraph 4.d. The use of expert knowledge for this purpose does not require a second independent inspection.

d Requires each installation that uses OB to address waste materials as identified above to:

(1) Immediately terminate the use of OB for disposal of solid waste (e.g., excess or deteriorated office furniture, building debris) that is not or could not possibly be contaminated with explosives residues. An exception to this prohibition is the use of sawn or rough cut lumber and wooden pallets, only where appropriate and necessary to meet thermal decontamination requirements and as authorized by permit. Such waste material should be disposed of by reuse or recycling, or through other appropriate means of disposal authorized by law and DoD and Army policy (e.g., shipment or delivery to a solid waste landfill or a treatment, storage, and disposal facility permitted to receive the material).

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(2) Evaluate available contained technologies for use in the treatment of the types of explosives-contaminated waste material addressed in paragraphs 3.b. and 4.b. and develop a timeline to procure and implement its use. This contained technology should be in place and operational no later than 1 October 2026. The exception is when an installation demonstrates to the Office of the Deputy Assistant Secretary of the Army for Environment, Safety and Occupational Health (ODASA (ESOH)) that this deadline is not technically or otherwise feasible, and proposes a later deadline, if feasible.

(3) Submit, within 12 months of the date of this memorandum, a transition plan to reduce or eliminate the use of OB to address the types of material identified in paragraphs 3.b and 4.b. to ODASA (ESOH) for review and approval.

5. This policy does not prohibit the use of OB operations in emergency situations when necessary and so long as conducted in accordance with applicable law and DoD and Army policy. If the circumstances allow, prior to conducting emergency OB operations, installations should advise the appropriate regulatory agencies of the circumstances and the duration of such operations. Otherwise, unless the law requires differently, installations should notify the appropriate regulatory agencies of the emergency use of OB operations as soon as practicable after the emergency situation has been controlled, mitigated, or eliminated.

6. Army installations that use OB to address solid wastes as indicated above should consult with their environmental office to identify safe and sustainable contained-disposal technologies. If needed, Army installations may also request assistance from the Joint Program Executive Office for Armaments and Ammunition, the Joint Munitions Command's Demilitarization Directorate, or the Defense Ammunition Center and U.S. Army Technical Center for Explosives Safety.

7. Point of contact for this action is Mr. J. C. King, Director for Munitions and Chemical Matters at (703) 697-5564, or james.c.king4.civ@mail.mil.


Alex A. Beehler

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