Environmental Document

ENV-WA006: Solvent Management Plan (12 APRIL 2023)

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1.0 PURPOSE

The United States Army is committed to the proper handling of solvents utilized on its installations. This procedure defines the requirements for managing solvents used by the various organizations operating on Fort Novosel.

Control of environmental procedures is addressed in procedure ENV-P002: Document Control.

2.0 SCOPE

This procedure applies to all facilities and organizations that utilize solvents. The requirements of this procedure are applicable to all military, civilian, tenant, and contract personnel at Fort Novosel.

The scope of this plan is limited in that it applies primarily to the use of and proper storage of solvents. Solvent disposal is addressed in Fort Novosel's Hazardous Waste Management Plan.

3.0 DEFINITIONS

Term	Definition
Bulk Container	Container with a capacity of 55-gallons or larger that is designed
	to store oil
DPW-ENRD	Directorate of Public Works, Environmental and Natural
	Resources Division, located in Bldg. 1121, telephone number
	334-255-1658
Solvent	Usually a liquid, used primarily for cleaning oily aircraft or
	automotive parts, containing hazardous or potentially hazardous
	ingredients

4.0 RESPONSIBILITIES

4.1 All Employees, Tenants, Contractors, Units, and Activities

It is the responsibility of each activity to follow proper procedures in accordance with this work instruction.

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4.2 DPW-ENRD Responsibilities

DPW-ENRD will periodically perform inspections to ensure compliance with this procedure. Updates to this procedure will be made by DPW-ENRD as necessary.

5.0 PROCEDURE

5.1 Spill Prevention, Control, and Countermeasures Plan Requirements

While solvents are not considered petroleum, oils or lubricants it is suggested all containers used to store new solvents, adhere to the requirements of the Spill Prevention, Control, and Countermeasures (SPCC) Plan.

5.2 Storage Requirements

All solvents must be stored in accordance the procedures listed below:

- Label all solvents clearly. Include the chemical name, hazard category (flammable, toxic, etc.)
- Use spill protection. Use spill trays or cabinets to contain any leakage or spills.
- Make sure the storage area is properly ventilated. Use ventilated cabinets to store volatile and odorous substances.
- Store flammable solvents properly. Use fire-resistant metal cabinets approved for flammable liquids.
- Segregate incompatible materials. Educate employees about chemical interactions and avoid storing materials that could create a dangerous reaction near each other.
- Do not stockpile hazardous chemicals. Order only what you can use within a reasonable time period.
- Properly dispose of solvents you don't need.
- Seal containers tightly.
- Never store chemical solvents with food.
- Use personal protective equipment. Employees handling solvents should wear appropriate eye protection, gloves, chemical aprons and closed-toe shoes. Respirators are also a good idea where appropriate.
- Use safe handling techniques. Transport chemicals in sturdy containers, including

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secondary containment units such as plastic totes or rolling cars with spill protection.

- Do not store solvents in a fume hood. This can interfere with safe ventilation.
- Do not mix different solvents.
- Do not overload shelves.
- Do not store solvents overhead.
- Do not store solvents under a sink. Undetected water leaks could erode solvent containers, leading to chemical leakage.
- Do not store flammable solvents near thermostats or electric motors. Vapor from solvents is highly flammable. Sparks from these items could cause an explosion even if no liquid is leaking.

5.3 Inspection Requirements

- 5.3.1 All containers must be visually inspected for proper storage.
- 5.3.2 Any deficiencies noted during inspections by the operators should be immediately corrected or submitted to the supervisor for further action.
 - 5.3.2.1 Any spills are the responsibility of the operator to correct. All spills should be cleaned up immediately. The source of all spills should also be addressed.
 - 5.3.2.2 The operator is responsible for ensuring that lids and the storage cabinet/building door are closed unless adding or removing items.
 - 5.3.2.3 Any issues with container labeling, condition, or secondary containment should be reported to Allison Marshall in DPW-ENRD at 334-255-1658 or allison.t.marshall.civ@army.mil.
- 5.3.3 DPW-ENRD will inspect solvent storage as part of the quarterly compliance inspection program using the checklist found in USAACE Form 2717, Environmental Compliance Inspection Checklist. Any findings that can be fixed on the spot (i.e., closing lids to containers, cleaning up spilled product) should be immediately corrected. Corrective actions for any findings resulting from these inspections must be developed by the organization within 30 days of receiving the inspection report from DPW-ENRD.

5.4 Training Requirements.

All organizations utilizing solvents must be trained in accordance with all applicable requirements including spill response and hazardous waste disposal. The training

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schedule is available on the Sustainable Fort Novosel website. Additional training may be scheduled if requested by contacting Allison Marshall in DPW- ENRD at 334-255-1658 or allison.t.marshall.civ@army.mil.

6.0 Locations/Organizations utilizing Solvents

The following list includes but is not limited to locations and organizations on Fort Novosel that utilize solvents.

- AMSS
- HMCC
- All aviation maintenance shops on the main cantonment and all airfields (M1)
- All automotive shops (Vanguish, Firestone, Auto Skills Center)
- Novosel Lanes
- TSC
- All custodial organizations, contractor or otherwise
- Golf course maintenance shop
- TAOG

7.0 Solvents

The following table indicates the types of solids utilized on Fort Novosel and the process in which they are used. While solvents with additional brand names may be utilized, the following list is representative of the primary solvent type according to active ingredients which are often duplicated by multiple commercial brands.

Table 1: Solvents

Brand Name	Description	Use	Primary Active Ingredients
Eco Link New II	Naphtha Solvent	Parts Cleaning (Aviation and Automotive)	Naphtha
Dowsil PR-1200	Adhesive Coating	Aviation Maintenance	Light aliphatics
Henkle Loctite	Primer	Aviation Maintenance	Heptane
Nexeo TT-N-95	Naphtha Solvent	Aviation Maintenance	Naphtha
3114 Tectyl 502C	Naphtha Solvent, Petroleum Distillate	Aviation Maintenance	Naphtha, light distillate, zinc

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Solvent Blend PT-	Paint Thinner	Aviation	MEK, Xylene,
1003 Type II		Maintenance	Toluene
Dysol DS-108	Wipe Solvent	Aviation	Ethyl lactate
		Maintenance	-
PPG Base	Paint, Paint Related	Aviation	Nitroethane,
Component		Maintenance	Strontium chromate
Lighthouse Non-	Cleaning Detergent	Custodial	Glycol Ether
ionic General			
Purpose Detergent			
Alkaline Cleaning	Cleaning Solution	Custodial	Alcohols, Methanol
Solution			
Skilcraft Brake	Automotive Cleaning	Automotive	Acetone, Toluene,
Cleaner	solvent	Maintenance	Methanol
Throttle Body	Automotive Cleaning	Automotive	Acetone, Toluene,
Cleaner	solvent	Maintenance	Methanol
3M Electronic	Automotive	Automotive	Isobutane, 2-
Contact Cleaner	Maintenance	Maintenance	Butoxyethanol

REFERENCES

Sustainable Fort Novosel website: www.fortnovosel-env.com

ENV-P002: Document Control

Spill Prevention, Control, and Countermeasures (SPCC) Plan

Installation Spill Contingency Plan (ISCP) Hazardous Waste Management Plan (HWMP)