

# **JBLM HAZARDOUS MATERIAL RESTRICTED USE LIST (CHEMICALS THAT RESTRICT HM USE)**

PW-ED, Pollution Prevention Program

## **1. INTRODUCTION**

The Restricted Use List (RUL) provides a listing of chemicals restricted on Joint Base Lewis-McChord (JBLM), WA. Any product is considered unauthorized if it contains at least one RUL chemical. A copy of the RUL is available from the JBLM Pollution Prevention Program (Building 1210). It lists restricted chemicals and their reasons for restriction. Items are restricted from use if they contain Montreal Protocol Chemicals (Ozone Depleting Chemicals (ODCs)); EPA or Washington State designated Persistent, Bioaccumulative, Toxic Chemicals (PBTs); EPA banned or severely restricted pesticides; Persistent Organic Pollutants; Per- and polyfluoroalkyl substances (PFAS), or other chemicals of high concern. The RUL is a living document and is reviewed on an annual basis. This is a restricted list, **NOT** a banned list, meaning exemptions are available in given circumstances (see 1.4 below).

### **1.1 STATEMENT OF PURPOSE**

The RUL is a mechanism designed to control the use and procurement of items that have an adverse impact on human health and/or the environment. These may be hazardous materials (HM) that contain chemicals requiring special procedures for handling, use, and disposal. In addition, these products may trigger various environmental reporting requirements. Misuse or mismanagement of these hazardous materials may place the installation in a non-compliance situation with various environmental regulations.

### **1.2 APPLICABLE LAWS AND REGULATIONS**

The RUL takes into consideration the goals and requirements outlined in the Clean Air Act (CAA) (42 U.S.C. s/s 7401 et seq.) Title VI *Stratospheric Ozone Protection*, Sections 601-618; 60 Federal Register (FR) 24969 *Protection of Stratospheric Ozone: Administrative Changes to Final Rule to Phase out Ozone-Depleting Chemicals, Final Rule*; 22 Nov 2002 Army Memorandum “*Elimination of Ozone Depleting Chemicals (ODCs) in Army Facilities*”; 7 January 2003 Army Memorandum “*Change in Army Policy for the Elimination of Ozone Depleting Chemicals*”; 64 FR 58666 *Persistent Bioaccumulative Toxic (PBT) Chemicals, Final Rule*; Washington Administrative Code (WAC) 173-333 *Persistent Bioaccumulative Toxins*; Stockholm Convention on Persistent Organic Pollutants; EPA designation of banned and severely restricted pesticides; EPA list of 31 Priority Chemicals; Executive Order 13834 *Efficient Federal Operations*; Part 23 of the Federal Acquisition Regulation; WAC 173-307 *Washington Hazardous Waste Reduction Regulations*; 27 Aug 2004 DoD Memorandum “*Establishment of the DoD Green Procurement Program*”; AR 200-1 *Environmental Protection and Enhancement*; Army Pamphlet 710-7 *Inventory Management: Hazardous Material Management Program*; 22 Nov 2006 Army Memorandum *Establishment of the Army Green Procurement Program*; *Army Green Procurement Guide*; JBLM installation Regulation 200-1 *Environmental Protection and Enhancement*; and the FY20 *National Defense Authorization Act* and other regulatory actions regarding PFAS. These documents mandate a management strategy for HM and place added restrictions or scrutiny on the use of certain HM.

### **1.3 SCOPE**

The RUL serves as a control measure applicable to all organizations, including contractors, who use HM on JBLM. Note that JBLM Yakima Training Center (YTC) maintains its own RUL for YTC resident organizations.

### **1.4 SPECIAL AUTHORIZATIONS**

#### **1.4.1 Technical Manual (TM) and Tech Order (TO) Items**

Items required by TM or TO that do not have an identified substitute in FEDLOG will be approved for use, although units and activities will still need to obtain an exemption letter from the JBLM Pollution Prevention Program. Organizations may request approval to use an item containing an RUL chemical by completing a Product Exemption Form ([HJB Form 226](#)) and submitting it to the JBLM Pollution Prevention Program (Bldg 1210). A Safety Data Sheet (SDS) must accompany the Product Exemption Form. The completed form must detail how and where the

product is being used and estimated usage amount. Pollution Prevention will reply by memorandum granting approval or disapproval, or identifying a suitable substitute.

#### 1.4.2 Suitable Substitute Not Available

In some applications, suitable substitutes are not available or have not been identified. Organizations may request approval to use an item containing a chemical on the RUL by completing a Product Exemption Form ([HJB Form 226](#)) and submitting it to the JBLM Pollution Prevention Program (Bldg 1210). A Safety Data Sheet (SDS) must accompany the Product Exemption Form. The completed form must detail how and where the product is being used and estimated usage amount. Pollution Prevention will reply by memorandum granting approval or disapproval, or identifying a suitable substitute.

## 2. PROCEDURES TO DETERMINE IF A PRODUCT IS A HAZARDOUS MATERIAL

“Hazardous material” (HM) is a useful product which requires special management because in a particular form or quantity it has hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity) that may pose an unreasonable risk to human health or the environment. OSHA 1910.1200 Worker Right-to-Know Act, requires manufacturers of HM to provide a label that identifies contents, hazards and precautions.

The label can be used to identify if a product is a HM. Products purchased through the federal supply system have federal stock classes (FSC) as part of their national stock numbers (NSNs). Products can be classified as hazardous based on the FSC. **If the product has a SDS, it is most likely a HM.**

### 2.1 FEDERAL STOCK CLASSES THAT CONTAIN HM

**2.1.1** The following list identifies federal stock classes (FSC) in which most material is HM. Organizations that store or use products with the stock classes will manage the products as HM. Products that do not have an FSC, but fall into these categories will be managed as HM. The product label can be used as a tool to verify that the product is a HM.

<u>FSC</u>	<u>TITLE</u>
2910	Engine Fuel System Components
6810	Chemicals
6820	Dyes
6830	Gases: Compressed and Liquified
6840	Pest Control Agents and Disinfectants
6850	Misc. Chemical Specialties: Solvent, Antifreeze, Inhibitor
7930	Cleaning and Polishing Compounds and Preparations
8010	Paints, Dopes, Varnishes and Related Products
8030	Preservatives and Sealing Compounds
8040	Adhesives
9110	Fuels: Solid
9130	Liquid Propellants and Fuels: Petroleum Base
9135	Liquid Propellants and Fuels and Oxidizers: Chemical Base
9140	Fuel Oils
9150	Oils and Greases: Cutting, Lubricating and Hydraulic
9160	Misc. Waxes, Oils and Fats

**2.1.2** The following list of FSCs contains some materials that are HM. Organizations that store or use products with the stock classes will review product data and manage the applicable products as HM. When there is doubt as to whether a material is a HM, contact JBLM Pollution Prevention (253-966-6469, [usarmy.jblm.id-readiness.list.dpw-environmental-advisors1@mail.mil](mailto:usarmy.jblm.id-readiness.list.dpw-environmental-advisors1@mail.mil)) for guidance on handling and storage. Products that do not have an FSC, but fall into these categories will be managed as HM. The product label can be used as a tool to verify that the product is a HM.

<u>FSC</u>	<u>TITLE</u>	<u>EXAMPLE</u>
2090	Misc. Ship & Marine Equipment	Liquid/Paste Resin, Hardener
2530	Vehicular Brakes, Steering, Axle, Wheel, & Track Components	Brake Shoes
2540	Vehicle Accessories	Mirror Adhesive Kit
2640	Tire Rebuilding and Tire and Tube Repair Materials	Items containing Toxic and Flammable Compounds
3433	Gas Welding, Heat Cutting and and Metalizing Equipment	Compressed Gases
3439	Misc Welding, Soldering and Brazing Supplies and Accessories	Cleaners, Acids, Flux
3610	Printing, Duplicating, and Bookbinding Equipment	Flammable or Toxic Lithographic Solutions
4210	Fire Fighting Equipment	Extinguishing Equipment
4240	Safety and Rescue Equipment	Items that release Oxygen or contain Compressed Gases or Initiating Charges
5330	Packing and Gasket Material	Asbestos, Lead Caulking
5610	Mineral Construction Material, Bulk	Asphalt, Sealing Compounds
5680	Misc. Construction Material	Repair Kits containing Chemicals
5910	Capacitors	Polychlorinated Biphenyls (PCBs)
5950	Coils and Transformers	PCBs
5970	Electrical Insulators and Insulating Materials	Insulating Varnish
6135	Batteries	Lithium, Mercury, Alkaline
6140	Batteries	Lead-Acid, Nickel Cadmium
6505	Drugs and Biologicals	Atropine, Isopropyl Alcohol, Chemotherapy Drugs
6525	X-Ray Equipment and Supplies	X-Ray Fixer, Developer
6550	In Vitro Diagnostic Substances	Lab Reagents, Test Kits
6750	Photographic Supplies	Solvents, Thinners
6780	Photographic Sets, Kits and Outfits	Solvents, Thinners
7510	Office Supplies	Solvents, Thinners, Cleaning Fluids, Flammable Inks and Varnishes
8520	Toilet Soap, Shaving Preparations And Dentifrices	Borax, waterless cleaner
8720	Fertilizers	Herbicides and/or Insecticides

## 2.2 PRODUCT LABEL INFORMATION

Federal Law requires that hazardous products be labeled: **DANGER, POISON, WARNING, OR CAUTION**. Each word indicates the degree of the product's toxicity:

**DANGER or POISON:** indicates high toxicity

**WARNING:** indicates medium toxicity

**CAUTION:** indicates low toxicity

Other words on the label help to determine the principal hazard of a product, these include: **corrosive**, **flammable**, **volatile**, and **caustic**.

### 3. PROCEDURES TO DETERMINE IF A PRODUCT CONTAINS A RESTRICTED CHEMICAL

All SDSs are required to have an ingredients section listing the reportable hazardous chemicals contained in a product. This section lists the individual hazardous chemicals in the product and their relative percentage of concentration. Some trade name products have secret ingredients termed *trade secrets* that are treated as proprietary information. Suppliers of such products must still provide health hazard data on the SDS and additional information to safety professionals.

Review the ingredients section (Section 3) of the SDS to determine if your product contains a restricted chemical. Occasionally, additional ingredients may be listed at Sections 15 or 16. Section 3 will list each hazardous ingredient along with their Chemical Abstract Service (CAS) number, a serial number that identifies the chemical regardless of the name variant used. Compare the chemicals listed on the SDS with the RUL to determine if any of the constituents in your product are restricted. If a chemical is on the Restricted Use List, your product is restricted from use. A request for exemption may be submitted, as outlined in section 1.4 of this document. For further guidance, contact the Pollution Prevention Program at 966-6469.

### 4. RESTRICTED USE CATEGORIES

The chemicals listed on the RUL are determined by various legislative requirements and other criteria. The following sub-paragraphs explain these in more detail.

#### 4.1 MONTREAL PROTOCOL CHEMICALS

The Clean Air Act Amendments of 1990 require the phased cancellation of Ozone Depleting Chemicals. Many ODCs have already been cancelled while others are scheduled to be cancelled by 2030. Army policy requires the eventual phase out of all ODCs. Pursuant to these requirements, ODCs are restricted from use on JBLM. Mission critical items as identified by Department of Defense (DOD) and Service headquarters will be approved for use.

Products that contain ODCs are restricted from use. This includes aerosols that use any of these chemicals for propellants. A request for exemption may be submitted, as outlined in section 1.4 of this document.

#### 4.2 DESIGNATED PERSISTENT, BIOACCUMULATIVE, TOXIC CHEMICALS

Persistent, bioaccumulative, toxic substances (PBTs) are toxic chemicals that persist in the environment and bioaccumulate in food chains, posing a risk to both human health and local ecosystems. [EPA](#) and Washington State Department of Ecology (WAC 173-333) have created lists of PBTs to be removed from the environment. The RUL incorporates these lists.

#### 4.3 PERSISTENT ORGANIC POLLUTANTS

In May 2001 the United States signed the Stockholm Convention on Persistent Organic Pollutants aimed at minimizing and eliminating the use of 12 Persistent Organic Pollutants (POPs). These pollutants are also classified as PBTs and therefore possess the characteristics noted in 4.2.

#### 4.4 BANNED OR SEVERELY RESTRICTED PESTICIDES

The EPA Office of Pesticide Programs (OPP) maintains a list of pesticides that are banned or severely restricted within the United States. The RUL includes these chemicals.

#### 4.5 OTHER CHEMICALS OF CONCERN

This category includes additional chemicals that are highly toxic, extremely harmful to the environment, and/or present in large quantities on JBLM. Many chlorinated solvents are currently included under this category due to their negative health impacts, wide regulatory coverage, and potential to significantly increase JBLM hazardous waste disposal costs.

## **4.6 PER- AND POLYFLUOROALKYL SUBSTANCES**

This category includes 172 per- and polyfluoroalkyl substances (PFAS) that EPA added to the Toxic Release Inventory as directed by Congress in the FY20 National Defense Authorization Act (NDAA). The NDAA also mandates the phase-out of aqueous film-forming foam (AFFF) for firefighting on Department of Defense facilities due to its PFAS content. As a chemical class, PFAS are linked to a number of human health impacts and are receiving increased regulatory scrutiny due to their toxicity, persistence in the environment, and widespread human and wildlife exposure.