

CHAPTER 12

Transportation of Recovered Chemical Warfare Material

12-1. Introduction. This chapter documents the transportation and disposal procedures for RCWM.

12-2. Transportation Regulatory Requirements. Transportation operations of RCWM will follow DA and other regulatory guidelines. Some of the major requirements include:

a. Manifesting and preparing shipments in according to 40 CFR 260-268 and 49 CFR 171-179 as necessary.

b. Following applicable state, EPA, DOT, OSHA, and Army requirements for worker training and certifications for the transportation of hazmat including hazardous waste.

c. Following security guidelines provided in AR 190-11, AR 50-6, 49 CFR 172 Subpart I, DOD 4500.9-R Chapter 205 paragraph X, and ETL 1110-1-502, Security Planning and Training Requirements for Hazardous Materials Shipments.

d. Following 50 USC 1512-1517.

12-3. Organizational Responsibilities.

a. PMECW. The PMECW has command responsibility to ensure that the RCWM is handled in a safe and environmentally acceptable manner. The PMECW has responsibility for overseeing RCWM handling activities such as monitoring, inspecting, labeling, documenting, loading, trans-loading, unloading, and transporting. A PMECW coordinator will be identified for this transportation effort to ensure all required coordination is conducted and responsibilities are fulfilled. Other PMECW responsibilities include:

(1) Developing a hazard analysis that addresses the relative risk associated with the planned transportation of RCWM. This analysis will identify variables that impact selection of landing areas and air corridors. In addition, the hazard analysis will assess transportation activities along the selected truck and air routes and risks associated with the vehicles or aircraft selected for this mission.

(2) Coordinating to ensure that all transportation operations are conducted in a safe and environmentally acceptable manner.

(3) Coordinating to ensure that the RCWM is properly packaged and repackaged, if required.

(4) Coordinating to ensure that standby decontamination and medical support is available during all phases of the transport operation.

(5) Coordinating RCWM movement with the TEU.

(6) Monitoring the status of the movement in coordination with RDECOM.

(7) Coordinating the Transportation Plan with the DHHS.

(8) Coordinating RCWM movement with the state emergency management agencies for all states along the transportation route.

b. District. The responsibilities of the PM with regard to RCWM transportation include:

(1) Providing proper notification to the USEPA and state regarding the transportation operation.

(2) Providing physical security and emergency response capabilities in direct support of TEU transportation activities.

(4) Notifying the National Response Center and the state officials of RCWM spills within the state, if releases exceed the reportable quantity.

(5) Providing communications equipment to be used by the TEU supervisor, site safety officer, and the PM while transferring the RCWM from the IHF to helicopter for off-site transport. The radios and telephones permit communications among key organizations and with emergency services organizations.

c. USAESCH. USAESCH is responsible for signing the hazardous waste manifest(s) for the RCWM (RCRA hazardous waste).

d. RDECOM. The responsibilities for RDECOM include the following:

- (1) Arranging for all aircraft and providing trained crews required to support the Transportation Plan.
- (2) Coordinating air transportation with the appropriate agencies.
- (3) Transporting RCWM from the site to the final disposition-site via helicopter and airplane.
- (4) Operating an operations center to monitor the complete movement of RCWM to the arsenal for disposal.
- (5) Implementing loading, trans-loading, and unloading plans for all operational activities.

e. TEU. The TEU is a specialized unit of the Guardian Brigade that has historically been the sole escort of RCWM as required by AR 50-6. TEU has the following responsibilities for transporting RCWM:

- (1) Ensuring that all required permits are obtained to transport hazardous materials/waste through each jurisdiction, as required.
- (2) Providing qualified escort personnel and trained emergency response teams to travel with the RCWM from the IHF until it reaches its final destination. The TEU will perform emergency response duties as required en route.
- (3) Providing and operating chemical agent monitoring equipment for first entry, trans-loading, contingency, and confirmation monitoring.
- (4) Ensuring that all personnel have completed required certification training prior to commencing the mission.
- (5) Providing transport vehicle(s) to move RCWM from the IHF to the embarkation point.
- (6) Selecting specific equipment to load, trans-load, and unload cargo and prepare a SOP for its use. The TEU will be required to develop inspection criteria to ensure equipment is operable.

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12-4. IHF Plan. PMNSCM will provide an IHF plan for the project. The IHF plan will address transportation of the RCWM from the “work site” to the IHF, before, during and after actions of receiving RCWM into the IHF, and storage and monitoring procedures. This plan will be included in the Work Plan.

12-5. Transportation Plan. PMNSCM will provide a placeholder for the Transportation Plan for inclusion in the CSS. Once the response action is underway and RCWM has been encountered, packaged, and placed in the IHF, a site-specific Transportation Plan will be produced. This plan will address all transportation matters concerning the movement of the RCWM item from the IHF to its final offsite disposal location. A Transportation Plan will not be required if an onsite destruction option is used.

12-6. Destruction Plan. If determined to be feasible and more cost effective than offsite transportation, PMNSCM may develop an onsite destruction plan. This plan would detail the methods and procedures for the safe destruction of RCWM onsite. The onsite destruction would involve equipment such as the Explosives Destruction System to safely neutralize the RCWM. Unless incorporated as part the CSS, the destruction plan will require the same approval process as the CSS.