



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

SAIE-ESOH

NOV 01 2018

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Open Burning (OB) of Waste Material

1. Reference Department of Defense (DoD) Instruction (DoDI) 4140.62, Material Potentially Presenting an Explosive Hazard (MPPEH), effective August 20, 2015, with change 1, effective October 3, 2017.

2. This memorandum advises commands that the Army has for decades sought alternative methods to reduce DoD's reliance on the use of open burning and open detonation (OB/OD) for the demilitarization of excess, obsolete, and unserviceable munitions. As part of these efforts, the Army has identified a variety of safe and sustainable closed-disposal technologies that are commercially available to dispose of waste material, including explosive-contaminated waste and explosives waste. The use of such technologies will allow the Army to eliminate or significantly reduce the use of OB for the disposal of explosive-contaminated waste or explosives waste.

a. Explosives-contaminated waste is waste material that is known or suspected to be contaminated with explosives residues that a qualified individual has determined does not pose an explosive hazard, but is unsuitable for release to the public. Such material includes: cardboard; plastic; paper; wooden inner or outer packaging; pallets; paper towels; filters; over garments and other personal protective equipment; dewatering filter socks; and other materials used in support of munitions operations.

b. Explosives waste is defined as waste that may pose an explosive hazard. Such waste includes: explosive-contaminated or saturated bags or packaging material; limited quantities of production wastes, including contaminated explosives; and out of specification products unsuitable for use or reprocessing. Technologies used to dispose of explosives waste must be designed to treat it safely and the DoD Explosives Safety Board (DDESB) must have approved its use for the treatment of the net explosives weight involved.

3. Army Commands will immediately:

a. Make a concerted effort to reduce reliance on OB for the disposal of explosives-contaminated waste and explosives waste listed in paragraph 2 above. At the end of the 2020 - 2024 Program Objective Memorandum Cycle, the treatment of such material by OB is prohibited.

SAIE-ESO

SUBJECT: Open Burning (OB) of Waste Material

b. Identify, plan and budget to procure technology appropriate to accomplish their requirements. Even though commands have until the end of Fiscal Year 2024 to procure closed-disposal technology, which will support the command's operational requirements, doing so as soon as possible is encouraged. Many closed-disposal treatment technologies will require environmental permits to operate, and may involve submission of a DDESB required explosives safety submission (RESS) (e.g., an Explosives Site Plan) or an amendment to an approved RESS.

c. Terminate the open burning of waste (e.g., excess or deteriorated office furniture, building debris) that is not or could not possibly be contaminated with explosives residues in sufficient concentrations to pose an explosive hazard. This prohibition includes the use of such material as fuel during OB operations.

4. Paragraph 2.5.c.(2) of referenced DoDI allows DoD Components to authorize the use of expert knowledge to determine the explosives status of waste. As such, expert knowledge is authorized for use to determine the explosives status of the types of waste indicated in paragraph 2 above, and whether the technology being used in place of OB is capable of treating it safely.

5. 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.



JOHN TESNER

Acting Deputy Assistant Secretary of the
Army for Environmental, Safety and
Occupational Health

DISTRIBUTION:

Chief, Army Reserve
U.S. Army Material Command
U.S. Army Corps of Engineers
U.S. Army Installation Management Command

CF:

Director of the Army Staff
Deputy Chief of Staff G-4
Director, Army National Guard
Director of Army Safety
Executive Director, Defense Ammunition Center and U.S. Army Technical Center for
Explosives Safety
Executive Director, DoD Explosives Safety Board