



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

APR 24 2007

SAIE-ESOH

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Treatment of Chemical Agent Identification Sets as Hazardous Waste

1. Effective April 23, 2007, the September 5, 1997, Interim Guidance for Biological Warfare Material (BWM) and Non-stockpiled Chemical Warfare Material (CWM) Response Activities, as amended, is changed (enclosure) to allow chemical agent identification sets (CAIS) that contain dilute chemical agents (CA) or industrial chemicals to be treated as hazardous waste, the exception is CAIS that may contain dilute nerve agent. Once determined to contain dilute chemical agents or industrial chemicals, CAIS, with the exception of the CAIS containing dilute nerve agent or neat CA, are no longer considered chemical agent materiel or chemical warfare materiel for the purposes of storage, treatment, or disposal.
2. CAIS that contain neat CA (i.e., CAIS K941 and CAIS K942) and any CAIS found to contain dilute nerve agent will continue to be managed as chemical warfare material (CWM).
3. My point of contact is J. C. King, (703) 697-5564 or [jc.king@us.army.mil](mailto:jc.king@us.army.mil).

Addison D. Davis, IV  
Deputy Assistant Secretary of the Army  
(Environment, Safety, and Occupational Health)

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SUBJECT: Treatment of Chemical Agent Identification Sets as Hazardous Waste

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Attachment: Change to 5 Sep 1997 Interim Guidance for Biological Warfare Materiel and Non-Stockpile Chemical Warfare Materiel Response Activities

Effective 19 April 2007, the below changes are made to the September 5, 1997, Interim Guidance for Biological Warfare Material (BWM) and Non-stockpiled Chemical Warfare Material (WCM) Response Activities, as amended.

Paragraph 1.b. is changed to read, "For the purposes of storage, treatment, or disposal, Chemical Agent Identification Sets (CAIS) that are determined to contain dilute chemical agents, with the exception of dilute nerve agent or neat CA, or industrial chemicals are not considered chemical agent materiel or CWM. As such, CAIS that do not contain dilute nerve or neat chemical agent may be stored, treated and disposed of as hazardous waste. Procedures for handling chemical agent-contaminated media and CAIS will comply with DoD Ammunition and Explosives Safety Standards and Army regulations, and be treated per applicable federal, state, local laws. In addition, a certificate of destruction will be obtained from the permitted Treatment, Storage, and Disposal Facilities (TSDF) to which CAIS are transported for destruction."

Appendix B, Definitions, the definition of Chemical Warfare Material is changed to, "Chemical Warfare Material (CWM). Items generally configured as a munition containing a chemical compound that is intended to kill, seriously injure, or incapacitate a person through its physiological effects. CWM includes V- and G-series nerve agents or H-series (mustard) and L-series (lewisite) blister agents in other-than-munition configurations; and certain industrial chemicals (e.g., Hydrogen Cyanide (AC), Cyanogen Chloride (CK), or Carbonyl Dichloride (called phosgene or CG)) configured as a military munition. Due to their hazards, prevalence, and military-unique application, CAIS are also considered CWM. CWM does not include: riot control devices; chemical defoliants and herbicides; industrial chemicals (e.g., AC, CK, or CG) not configured as a munition; smoke and other obscuration producing items; flame and incendiary producing items; or soil, water, debris or other media contaminated with low concentrations of chemical agents where no CA hazards exist."