DEPARTMENT OF THE NAVY
NAVY PETROLEUM OFFICE
CAMERON STATION
ALEXANDRIA, VIRGINIA 22304-6180

IN REPLY REFER TO

NAVPETOFFINST 4025.2A
43/TNC

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NAVPETOFF INSTRUCTION 4025.2A

Subj: HANDLING AND DISPOSITION OF OFF-SPECIFICATION LOW FLASH POINT PETROLEUM PRODUCTS

Ref:
(a) NFPA 30, Flammable and Combustible Liquids Code, 1-2, Definitions
(b) NAVFAC Design Manual 22, Petroleum Fuel Facilities
(c) MIL-HDBK-201, Military Standardization Handbook, Petroleum Operations
(d) MIL-HDBK-200, Military Standardization Handbook, Quality Surveillance Handbook of Fuels, Lubricants and Related Products
(e) Naval Supply Systems Command Manual, Volume II, Supply Ashore
(f) NAVSUP PUB 558, Fuel Management Ashore
(g) DOD 4160.21, Defense Disposal Manual
(h) OPNAVINST 5090.1, Environmental and Natural Resources Protection Manual
(i) NAVFACINST 11010.44, Shore Facilities Planning Manual
(j) OPNAVINST 11010.20, Facilities Projects Manual
(k) NAVFACINST 6240.3, Department of the Navy Pollution Control Reports
(l) NAVFAC 5100.14, Navy Occupational Safety and Health (NAVOSH) Deficiency Abatement Program Analysis
(m) DLAM 4270.1, DLA Facility Project Manual
(n) NAVSUPINST 4100.3, Fuel Reclamation Program

1. Purpose. To provide guidance on the proper handling, storage, recycling and disposition of off-specification low flash petroleum product.

2. Cancellation. NAVPETOFFINST 4025.2

3. Definitions

a. Flammable Liquid. A liquid having a flash point below 100°F (37.8°C) and having a vapor pressure not exceeding 40 psi (absolute) at 100°F (37.8°C). Reference (a) applies.

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b. Low Flash Point Product. A POL product meeting the definition for flammable liquid.

c. Combustible Liquid. A liquid having a flash point at or above 100°F (37.8°C). Reference (a) applies.

d. High Flash Point Product. A POL product meeting the definition for combustible liquid.

e. Off-Specification. POL product that does not meet original product specification requirements or deterioration limits and may not be suitable for originally intended use.

f. Contamination. Intrusion of material or substances that are not intended as components of the original product. Contaminants may render a product unusable.

g. Hazardous Material. A substance meeting any or all of the conditions of ignitability, corrosivity, reactivity or toxicity as defined by Federal, State, or local laws and regulations.

h. Hazardous Waste. Any discarded or abandoned material which is regulated by Federal, State or local laws and regulations.

4. Guidance

a. General. Off-specification low flash products are potentially hazardous materials. Careless or improper handling of these products may result in loss of life and property.

b. Commingling off-specification low flash product with high flash product for reuse. An area of special concern is the commingling of low flash product with high flash product. Low flash product will dramatically depress the flash point of the resultant mixture. Commingling shall be avoided unless recommended. If commingling is approved, the resulting mixture shall be managed as a low flash product until the flash point, the hazard and the potential use of the resulting product is identified.

5. Discussion. Procedures for handling and disposition of off-specification low flash product shall be based on the following criteria:

a. Facility Design. Facilities designed to handle and store off-specification low flash product shall conform with reference (b).

Modification to equipment (pumps, filters, etc.) may be necessary due to hazardous characteristics of product.

b. Facility Operation. The operation of facilities and equipment required to handle and store low flash product shall be in accordance with procedures in reference (c).

c. Reusability. To maximize economic return, reuse of off-specification low flash product is a viable option; however, the protection of life, property and the environment will remain the foremost consideration. Evaluation of reusability shall be made in accordance with the following priorities:

(1) Blending into on-specification product. A blended product must meet specific product characteristics or deterioration limits defined in reference (d). Approval may be requested to blend FIRST to Navy stocks. If blending cannot be accomplished to Navy stocks, approval may be granted for blending to DLA stocks. Consult administrative procedures for blending into Navy stocks (reference (e)) or for blending into DLA stocks (reference (f)).

(2) Downgrading product. As defined by reference (d), a contaminated low flash product that meets the chemical and physical requirements of a lower grade product (i.e., premium gasoline to regular gasoline) may be downgraded to the lower grade product in accordance with references (e) and (f).

(3) Transfer to another Navy activity. Low flash product which cannot be blended or downgraded may be transferred to another Navy activity for use. The most important factor is the requirements of the end user. Consult administrative procedures in reference (f).

(4) Disposal through Defense Reutilization and Marketing Office (DRMO). Normally, the last option available for disposal is transfer to the local DRMO for sale. Transfer procedures are provided in references (g) and (h). A benefit of this type of disposal is that 100 percent of the proceeds generated as a result of a sale will be returned to the generating activity. Conversely, if the product is not sold, the submitting organization must reimburse the DRMO for the cost of disposal.

d. Protection of the Environment. Overall environmental program requirements are prescribed in reference (h). The following factors should be considered:

(1) Hazardous wastes. Depending on appropriate regulations, an off-specification low flash product may be classified as a hazardous waste. Management of hazardous waste requires: (a) obtaining licenses and permits and reporting to the Federal, State and local regulatory agencies; (b) specially designed and permitted storage facilities; and (c) transport by a licensed hazardous waste hauler and disposal at a licensed Treatment Storage and Disposal Facility (TSDF). Satisfying these requirements is time consuming and costly. For this reason, every effort shall be made to minimize generation of hazardous waste.

(2) Air pollution. Depending on volume and product characteristics, air pollution permits may be required to handle and store low flash product. Special facilities (floating roof tanks) and equipment (vapor recovery systems) may be required to control air emissions.

(3) Water pollution. Bottom water stripped from tanks may require treatment prior to discharge. Discharge may require a National Pollution Discharge Elimination System (NPDES) permit.

(4) Technical assistance. In evaluating the impact of the above environmental factors, the following organizations shall be contacted: Navy Petroleum Office (NAVPETOFF), cognizant Naval Facilities Engineering Field Division (NAVFAC EFD), the local environmental or hazardous waste coordinator, the local Defense Reutilization and Marketing Office and the Defense Reutilization and Marketing Region (DRMO and DRMR).

6. Action

a. Generators of off-specification low flash product, other than Naval Supply Centers/Naval Supply Depots, shall:

(1) Survey fuel facilities to ensure compliance with this instruction and appropriate references. If facility improvements are required, develop projects designed to properly segregate, store, recycle and dispose of contaminated low flash product. Project documentation shall be developed and submitted using the following procedures:

(a) Military Construction Projects. Documentation shall be prepared and submitted in accordance with reference (i).

(b) Special Projects. Prepare and submit in accordance with reference (j).

(c) Pollution Abatement Projects to correct environmental deficiencies (air, water, hazardous waste). Document and submit in accordance with procedures prescribed in reference (k).

(d) Navy Occupational Safety and Health Projects. Safety and health deficiencies shall be documented and projects submitted in accordance with procedures prescribed in reference (l).

(2) Develop, with the assistance of cognizant NSC/NSD and NAVPETOFF, Standard Operating Procedures (SOP) for the handling, storage, recycling and disposing of off-specification low flash products. This SOP shall be consistent with procedures outlined in this instruction and appropriate references. The SOP shall be forwarded for approval to the activity's major claimant via the cognizant NAVFAC EFD, NAVFAC, and the NAVPETOFF.

b. Naval Supply Centers/Naval Supply Depots shall:

(1) Survey fuel facilities to ensure compliance with this instruction and appropriate references. If facility improvements are required, develop projects designed to properly segregate, store and dispose of low flash product. Documentation for these projects shall be submitted in accordance with procedures outlined in reference (m).

(2) Develop an SOP for acceptance, handling, storage, management, reuse and disposal of low flash product and submit SOP to NAVSUP for approval. The following shall be incorporated in the SOP:

(a) Acceptance criteria based on guidance provided in reference (n).

(b) Low flash product shall not be accepted into existing Navy stocks unless it can be downgraded or blended into usable, on-specification product.

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(3) In situations where product cannot be accepted due to the restrictions outlined above, every effort shall be made to assist the generator in finding a safe and environmentally acceptable method for disposing or recycling the product.

(4) Assist generators of low flash product in the development of their SOP for handling, storing, recycling and disposal of low flash product.

c. NAVPETOFF shall provide technical assistance as follows:

(1) Defining operational and facility deficiencies.

(2) Developing corrective actions and projects.

(3) Reviewing SOPs.

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