



DEFENSE LOGISTICS AGENCY
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IN REPLY
REFER TO DLMSO

August 15, 2006

MEMORANDUM FOR SUPPLY PROCESS REVIEW COMMITTEE MEMBERS

SUBJECT: Approved Defense Logistics Management System (DLMS) Change (ADC)
207, New Discrepancy Codes for Identification of Hazardous Material
(Supply/SDR/SQCR) (Staffed by PDC 213A)

The attached change to DoD 4000.25-M, Defense Logistics Management System (DLMS) and DLAI 4140.55, AR 735-11-2, SECNAVINST 4355.18A, AFJMAN 23-215, Reporting of Supply Discrepancies, is approved for implementation.

Addressees may direct questions to the Defense Logistics Management Standards Office point of contact, Ms. Ellen Hilert, Chair, Supply Process Review Committee, 703-767-0676, DSN 427-0676, or e-mail: Ellen.Hilert@dla.mil. Others must contact their Component designated representative.

A handwritten signature in black ink, appearing to read "Donald C. Pipp".

DONALD C. PIPP
Director
Defense Logistics Management
Standards Office

Attachment

cc:
SDR Committees (U.S. & SA)
Defense Stock Readiness Group
DoD Shelf Life Committee
ADUSD(L&MR)SCI

ADC 207
New Discrepancy Codes for Identification of Hazardous Material

1. ORIGINATOR:

a. Service/Agency: Defense Logistics Agency

b. Originator: DLA/J-3731, phone: DSN 427-2527 / Commercial 703-767-2527

2. FUNCTIONAL AREA: Primary: Supply/SDR and DD 1225 Storage Quality Control Reports (SQCR)

3. REFERENCES:

a. DLAI 4140.55/AR 735-11-2/SECNAVINST 4355.18A/AFJMAN 23-215, Reporting of Supply Discrepancies

b. DLAI 4145.4, DOD Stock Readiness

4. REQUESTED CHANGE:

a. Title: New Discrepancy Codes for Identification of Hazardous Material

b. Description of Change: This change establishes new discrepancy codes under references a and b, and DLMS procedures, to identify supply and storage discrepancies which pertain specifically to discrepant hazardous material identified at time of receipt or in storage. **Changes from the PDC are highlighted in yellow.**

c. Background:

(1) A review of Discrepancy codes available in referenced regulations revealed that the only discrepancy codes available for use which relate to hazardous material discrepancies are discrepancy codes which apply to “discrepant packaging” of hazardous material. There are no discrepancy codes currently available to specifically identify discrepant hazardous material at receipt (hazardous material received in a condition other than shown on the supply documentation or on the supporting inspection/test certificate) or to identify discrepant material found in storage (hazardous material in storage damaged/requires repair).

(2) The lack of supply and storage discrepancy codes which relate specifically to hazardous material discrepancies negatively affects the ability of hazardous material managers to develop metrics/statistics as they pertain specifically to discrepant hazardous material identified at receipt or in storage.

(3) **PDC 213A.** The original PDC 213 proposed only two new codes to be added under existing categories. During staffing the Defense Distribution Center (DDC) proposed an alternative code structure which the DLA focal point approved. The revised structure was redistributed as PDC 213A and is approved for DOD use as modified below. For reference the original proposed codes were:
 SDR: C7 - Hazardous Material in a Condition Other Than Shown on Supply Document or on the Supporting Inspection/Test Certificate
 SQCR: A6 - Hazardous Material in Storage Damaged or Requires Repair

d. Following are comments received during staffing of PDC 213A, submitter response, and DLMSO disposition:

<p>DSCA Submitted by: Greg Myers, U.S. Army Security Assistance Command - New Cumberland</p>	<p>Comment: "I disagree with the proposed change to add unique discrepancy codes for hazardous materiel. The stated reason is to provide "the ability of hazardous material managers to develop metrics/statistics as they pertain specifically to discrepant hazardous material identified at receipt or in storage." There are other alternatives to meet this goal than adding new codes, or to add the "Hazardous Materiel Code" to the SDR system (an option discussed by the proposal). We would quickly run out of codes if we were to add separate codes for each possible special interest category of materiel, e.g., special codes for Packaged Petroleum items, ammunition items, printed products, circuit cards, aircraft items, Given the capabilities of data base management systems, I think it is the responsibility of the Hazardous Materiel Managers to develop an internal metric system, rather than placing the burden on a supporting system. Regarding their argument about the need to segregate the materiel from non-hazardous materiel, obviously the storage depot has the capability to identify the materiel as hazardous (and be able to handle it accordingly), or they wouldn't be able to determine to use the codes applicable to hazardous materiel. In summary, the change and rationale do not pass the common sense test."</p>
<p>DLA-J3731 Vickie Albert, DLA SDR Lead</p>	<p>Submitter response: The responder is correct in his statement that storage sites have the capability to identify hazardous material. However identifying Hazardous material in a storage system and reporting hazardous shipping and packaging errors in accordance with DLAI 4140.55 fall into two different informational metrics buckets. Given the seriousness of Hazardous shipping and storage errors and the affect the errors may have on the health and safety of DOD personnel and on other material stored or shipped with hazardous material, it is surprising that a requirement to add specific Hazardous Supply Discrepancy Reporting discrepancy codes was not identified earlier. DoD is moving into a bigger world that is changing rapidly with new problems and new requirements. Adding new applicable Discrepancy codes to the Supply Discrepancy reporting regulation is part of moving forward in a changing world and developing improvements to existing processes. It might be important to note that shipping discrepancy reporting improvements/changes of this sort are for the most part very minor in most SDR processing systems (i.e. update to an existing table). The improvements can therefore be accomplished quickly.</p>
<p>DLMSO Ellen Hilert, SDR System Administrator</p>	<p>Disposition: While there is a concern about the rising number of discrepancy codes available for use, DLMSO does not see this as a reason to deny the DLA request as it provides an expeditious means of addressing the requirement.</p>

e. Procedures:

(1) Establish a new category for hazardous material discrepancy codes under the current applicable discrepancy code lists for Supply Discrepancy Reports (SDRs) (SF 364, Document Type 6, 7, 8, 9, and R) and Storage Quality Control Reports (SQCR) (DD 1225, Document Type 5). New category and codes are listed below. Codes applicable to SDRs will be added to DLAI 4140.55 Enclosure 3, Typical Shipping and Packaging Discrepancies Listed by Discrepancy Code. All codes will be added to the DLMS Dictionary.

Discrepancy Code		
Code	Definition	Applicability
CONDITION OF MATERIAL		
C1	In a condition other than shown on supply document or on the supporting inspection/test certificate (<i>if hazardous material use code H1</i>)	SDR and SQCR
C2	Expired shelf life item (<i>if hazardous material use code H5</i>)	SDR and SQCR
HAZARDOUS MATERIAL		
H1	<i>Hazardous item in a condition other than shown on supply document or on the supporting inspection/test certificate</i>	SDR
H2	<i>Hazardous item in storage damaged or requires repair</i>	SQCR
H3	<i>Lack of a Material Safety Data Sheet (MSDS) in Hazardous Material Information Resource System (HMIRS)</i>	SDR related to new procurement only – customer or depot receipt
H4	<i>Non-radioactive item classified as radioactive, or non-hazardous item classified as hazardous</i>	SDR and SQCR
H5	Expired hazardous shelf life item	SDR and SQCR

(2) Revise DLAI 4140.55 to insert new subparagraph (17) below paragraph E.2.b. Shipping Discrepancies, and renumber existing subparagraph (17). A corresponding change to the DLMS Manual will be made.

(17) Hazardous Material. Report discrepant receipt of hazardous material under the appropriate H-series discrepancy code.

(3) SQCR discrepancy codes are included in the DLMS formatted transaction which is created by the Distribution Depot (DD) to transmit a SQCR to the

material owner. The electronic transmission is currently implemented only within DLA. The discrepancy codes are not currently displayed on the printed DD 1225 provided by the DD in lieu of the electronic transmission. Under full DLMS implementation, the DLMS transaction will interface with the Services and provide the discrepancy code. Under planned future WebSDR implementation the e-mail notification of the SQCR will reflect the discrepancy code.

5. Reason for change: This change will be used by managers to segregate hazardous material supply and storage discrepancies from other material supply and storage discrepancies. The two new codes will allow personnel submitting SDRs or SQCRs to specifically identify and document discrepancies as they pertain to hazardous material. Addition of the new hazardous discrepancy codes will improve DOD ability to identify and separate shipping and storage supply discrepancies that relate to hazardous material only. This will improve development of metrics/statistics for supply and storage discrepancies as they relate to discrepant hazardous material identified at time of receipt or found in storage. Additional specific reasons are provided for the three codes added under the revised PDC.

a. For H3, the reasoning here is that the supply centers are required to provide HMIRS with a copy of the manufacturers MSDS so HMIRS can enter the data and make up a governmental MSDS number. When the depot does not have one of these at receipt, it increases the workload of the depot, and the HMIRS people because we have to follow up with a special request from to HMIRS and they in turn have to go to the manufacturer, or perform research to obtain the hazmat data, then assign a MSDS. Once a MSDS is assigned, the depot must go and update the records to reflect the proper MSDS.

b. For H4, the DDC has for years been asking for the ICPs and DSCs to furnish separate NSNs for items that were hazardous/radioactive and are no longer hazardous/radioactive. Procurement guidance requires separate NSNs and when this does not happen it creates extra work at the depot.

c. For H5, the reasoning is we receive returns that are hazardous and have a type I shelf-life code assigned to the NSN and the materiel is expired and since it is "Type I" cannot be extended. Therefore, the materiel must be sent to DRMO and this takes time so the assignment of a separate discrepancy code would help track this materiel so that we can get it moved out before we get fined for storing hazardous waste.

6. Advantages and Disadvantages:

a. Advantages: This change will improve processing of Hazardous material SDRs and SQCRs as well as improving management reporting and identification of hazardous material discrepancies.

b. Disadvantages: None identified.

7. Alternatives: DLMSO Comment: New discrepancy codes would not be needed if the Hazardous Material Code was available to the processing systems to alert the action

activity during SDR/SQCR review and for reports/metrics. If available by interface with the Federal Logistics Information System (FLIS) and associated with the SDR record, existing discrepancy codes would be sufficient to satisfy the purpose of this change. However it is noted that the addition of a new data element, Hazardous Material Code, to the applicable record would be more costly than the addition of new Discrepancy Codes (accomplished by a minor table update).

8. IMPACT:

- a. DLMS and joint Component guidance and implementing guidance for SDRs and SQCRs
- b. Distribution Depot procedures
- c. DOD WebSDR and Component SDR/SQCR processing systems.