

# Environmental Standard Operating Procedure

Originating Office: <b>Natural Resources and Environmental Affairs Office</b>	Revision: 18 May 16	Prepared By: NREA Subject Matter Expert (SME)	Approved By: Patrick Mills <i>Patrick Mills</i>
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## Title: Hazardous Waste Accumulation Area (Less than 90 Day Site)

### 1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for the management of the Hazardous Waste Accumulation Areas (Less than 90 Day Sites).

### 2.0 APPLICATION

This guidance applies to those individuals who are working within the management of the Hazardous Waste Accumulation Areas (Less than 90 Day Sites) aboard Marine Corps Air Ground Combat Center (MCAGCC) Twentynine Palms.

### 3.0 REFERENCES

- Code of Federal Regulations – Title 40, (40 CFR)
- Code of Federal Regulations – Title 29, (29 CFR)
- MCO P5090.2A change 3
- Hazardous Waste Operations Manual, MCAGCC
- Combat Center Order (CCO) 5090.5C, Integrated Contingency and Operations Plans (ICOP) for MCAGCC

### 4.0 PROCEDURE

#### 4.1 Discussion:

The Hazardous Waste Accumulation Area (HWAA) is operated by Hazardous Waste Management Section (HWMS), Environmental Affairs Branch, Natural Resources and Environmental Affairs (NREA), Division. The supervisor of the HWMS prepares and promulgates hazardous waste (HW) accumulation, handling, and turn-in procedures for MCAGCC. The HWMS is responsible for collecting and receiving HW from organizations at MCAGCC. The HWMS is responsible for recycling, treatment, reduction, and reuse of California listed waste within one year from accumulation. Additionally, the HWMS is responsible for the less than 90-day storage of HW and off-base shipment and disposal of HW. HWMS shall ensure adherence to all applicable HW regulations, including the proper containerization, labeling, and documentation. HWMS shall ensure observance to the 90-day storage limit for non-recyclable/treatable for HW, and for the proper recycling, treatment, reduction, and reuse of California listed HW. HWMS shall reference the most

current version of the Hazardous Waste Operations Manual, and the ICOP for MCAGCC for information regarding the HWAA operations.

#### **4.2 Operational Controls:**

Refer to the most current version of the Hazardous Waste Operations Manual, and the ICOP for MCAGCC for operational controls and procedures.

#### **4.3 Documentation and Record Keeping:**

The following records must be maintained when storing hazardous materials:

1. MSDS/SDS for all hazardous material being stored.
2. Inspection and training records.

#### **4.4 Training:**

All affected personnel shall be trained in this Standard Operating Procedure and the following:

1. Most current version of the Hazardous Waste Operations Manual
2. Hazard Communication training/Globally Harmonized System.
3. 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Course.
4. 49 CFR Department of Transportation (DOT) for transporting of hazardous waste (Every 3-Years)
5. General Environmental Awareness training.

#### **4.5 Emergency Preparedness and Response Procedures:**

Refer to Combat Center Order (CCO) 5090.5C, Integrated Contingency and Operations Plans (ICOP) for MCAGCC.

#### **4.6 Inspection and Corrective Action:**

Daily, weekly, and quarterly inspections are required at the HWMS lot. The HWMS manager or designee shall have the overall responsibility to ensure that daily and weekly inspection requirements are met. The HWMS Manager shall ensure deficiencies are noted during the inspections and that those deficiencies are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet. The NREA Compliance Branch shall conduct quarterly inspections. Refer to Hazardous Waste Operations Manual, Total Waste Innovations, December 2004 for inspection sheets and guidelines.

Hazardous Waste Accumulation Area – Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
<b>Administrative</b>			
1. Are HW personnel training records current?			
2. Is the HW Operation Manual and HW operations consistent and up to date?			
3. Are daily, weekly, and quarterly inspections completed and corrective action taken as needed?			
4. Are HW collection and turn-in documents on file for a minimum of three years?			
5. Is the inventory for HW destined for off-site disposal and recycling; on-site recycling/treatment; and available for reuse current and up-to-date?			
6. Are waste manifest/Receipts/TSDf signed manifests or bill of ladings on file? Have Exception Reports been sent to DTSC?			Annually
<b>Safety &amp; Spill Prevention and Control</b>			
7. Is the alarm system functional?			
8. Are compatible fire extinguishers available and maintained in a serviceable condition?			
9. Is PPE on-hand and in a serviceable condition?			
10. Are eyewash stations on hand and serviceable?			
11. Is there an adequate spill kit nearby?			
12. Are all incidental releases that occurred during filling operations properly cleaned up?			
13. Is the area free of spills or leaks?			

<b>Inspection Items</b>	<b>Yes</b>	<b>No</b>	<b>Comments</b>
<b>Containment Areas</b>			
14. Is the area free of debris and other materials?			
15. Are temporary containments, impermeable liners, and berms in HWAA serviceable? Is the containment capacity 10 percent of total or 110 percent of the largest container?			
16. Are secondary containments free of excess dirt and debris?			
17. Are drums and containers not leaking, damaged, misused, or missing from the HWAA?			
18. Is all liquid HW stored in a secondary containment?			
19. Are all solid HW that do not have primary containment (ammo boxes, fuel bladders, etc) in a covered primary containment container?			
<b>Containers</b>			
20. Are containers compatible with the waste?			
21. Are containers in good condition (free of dents and corrosion, not bulging, or otherwise deteriorating)?			
22. Are container tops free of spillage?			
23. Are containers properly closed?			
24. Are markings and labels on all containers and bulk storage areas present, legible, and appropriately completed and have the words hazardous waste?			
25. Is the proper Initial Date of Accumulation (IDOA) marked on each HW container and bulk storage unit?			
26. Is Accumulation Start Date (ASD) shown on all containers and bulk storage units?			

Inspection Items	Yes	No	Comments
27. Are all HW containers destined for disposal stored for less than 90 days since ASD?			
28. Is there any HW destined for off-site recycling or for in-house recyclable/treatment exceeding 1-year from the ASD?			
29. Are empty containers marked with the date they became empty, the word "empty" and the last known contents?			
30. Are all containers stored in a manner to prevent leakage?			
31. Are lead acid batteries' caps and posts taped and stored in a manner to prevent leakage?			
32. Are incompatible waste stored separately?			
33. Have unknown HW or suspected PCB electrical components been sampled for analysis?			
34. Are electrical components been marked with the wording PCB or Non-PCB according to analytical results? Is the PCB concentration marked on the PCB item?			
<b>Waste Tanks (Bulk Storage)</b>			
35. For bulk waste ASTs, are hoses, couplings, vent caps, and fill caps free of leaks, cracks, or breaks?			
36. Is the annular space-monitoring device on bulk waste ASTs reading non-detect?			
37. Are waste AST free of corrosion or release of any waste?			
38. Does the waste AST appear to be operating according to design?			

Inspection Items	Yes	No	Comments
39. Is there any indication of erosion or release of the primary or secondary containment?			
40. Is the content of the waste AST and the wording – Hazardous Waste marked on the AST?			
41. Is the Accumulation Start Date on the waste AST?			
42. Have the waste in the AST been disposed of within the allowable accumulation time?			
43. Is the waste AST compatible with its contents?			

**ADDITIONAL COMMENTS:**

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**CORRECTIVE ACTION TAKEN:**

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**Hazardous Waste Management Section's Supervisor**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_