

Environmental Standard Operating Procedure

Originating Office: Natural Resources and Environmental Affairs Office	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 Recycling

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for proper hazardous waste recycling.

2.0 APPLICATION

This guidance applies to those individuals who are working with hazardous waste recycling 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 Management Section (HWMS) is responsible for receiving and collecting Hazardous Waste (HW) Recyclables from organizations at MCAGCC. It is the responsibility of the HWMS and the work sections aboard the installation to collect and segregate HW per their recycling needs.

HWMS prepares and stores on an interim basis HW recyclables for off-site disposal in accordance with all applicable HW recycling regulations, to include proper containerization, labeling, and documentation.

4.2 Operational Controls:

The following procedures apply for HW Transportation:

1. Ensure Safety Data Sheets (SDSs) are readily available and current.

2. Ensure accumulation areas at the HWAA lot are readily available to collect hazardous waste from personnel turning in HW.
3. Ensure HW recyclables are identified and are stored/recycled where applicable, according to the installation ICOP or applicable SOP.
4. Once HW has been turned in, and/or collected and identified as a HW recyclable; it must be treated as a HW recyclable and stored as such.
5. All applicable HW/recyclables manifested off-site disposal/recycling must have a Contract Line Number (CLIN).
6. The following items are considered HW recyclables:
 - a. Batteries to include: cell phone, camera, lithium, alkaline, Ni-cad
 - b. Lead-acid car batteries or lead acid batteries used for weapons systems
 - c. CRTS's (TV's and monitors), E - Waste
 - d. Steel containers /55 gallon or less
 - e. Oil, antifreeze, bilge (mixed POLs)
 - f. JP8, JP5, diesel, gasoline (MoGas)
 - g. Absorbent pads contaminated with POLs
 - h. All plastic content used for HM
 1. Evacuated Freon / refrigerant- Section 608
 - j. Oil from white good compressors
 - k. W h i t e goods to include: washers, dryers, refrigerators, water fountains, microwave, stoves.
7. Wear appropriate PPE (Personal Protective Equipment) applicable to your duty when handling HW recyclables.
8. Maintain all equipment and perform duties applicable to HW recycling per the installation ICOP.
9. Collect, store and contain hazardous waste in accordance with the installation ICOP, including but not limited to:
 - a. proper labeling
 - b. proper marking
 - c. proper storage and containment (i.e., metal or poly drum)
 - d. lids closed at all times unless adding or removing waste
 - e. proper documentation to include Waste Information Documents (WIDs) and weight information.
10. Ensure records are maintained for internal documentation as required by HWMS regulations.
11. Ensure a serviceable spill kit is available.
12. Ensure that appropriate and serviceable fire extinguisher is available.

13. Turnover folder information must be maintained for this Standard Operating Procedure (SOP).

14. If there are any specific situations or other concerns not addressed by this procedure, contact the MCAGCC Natural Resources and Environmental Affairs (NREA) office.

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 must be trained in this Standard Operating Procedure and the following:

1. Hazard Communication training/Globally Harmonized System.
2. General Environmental Awareness training.
3. SOP for Hazardous Waste Operations; (Hazardous Waste Operations Manual)
4. 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Course.
5. All other applicable training will be given as it applies to specific work requirements.

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 Recycling – Inspection Checklist

Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are Safety Data Sheets (SDS's) available for all hazardous material being used or stored?			
2. Have unit personnel received appropriate level of training?			
3. Are hazardous materials stored in a compatible manner according to Manufacture's SDS recommendations and NAVOSH HM Compatibility Chart?			
4. Are hazardous materials stored in appropriate containers per their contents? (e.g., acid stored in poly drum versus metal drum)			
5. Are good house-keeping practices being adhered to and employed within the HM storage area?			
6. Does the facility or work site store more than a total of 1,320-gallons of petroleum products in containers that are 55-gallons or larger? a. If so, does the facility have an SPCC Plan? b. If so, is the site attended for more than 4 hours per day? c. If so, is the SPCC Plan on-site? d. If an SPCC Plan is not required, has a Best Management Plan (BMP) been completed, e. Are employees trained and informed of the SPCC requirements?			
7. Are the applicable regulations being followed per installation AST ESOP if the petroleum product is stored in an aboveground storage tank (AST)?			
8. Does the facility or work site store flammable or combustible paint in accordance to guidance given by the installation?			

Inspection Items	Yes	No	Comments
9. Does the facility or work site store compressed gas cylinders in accordance with SDS guidelines and Marine Corps policy?			
10. Is personnel protective equipment (PPE) on hand and serviceable?			
11. Are manufactures Hazardous Material labels legible?			
12. Are hazardous materials stored within shelf life?			
13. Are all cylinder caps in place and cylinders secured?			
14. Are empty gas cylinders tagged and segregated from full containers?			
15. Are all containers managed to prevent leakage?			
16. Are compatible fire extinguishers available and functional?			
17. Are spill kits on hand and serviceable?			
18. Are eyewash stations on hand and serviceable?			
19. Does the command possess a current authorized user list (AUL)?			
20. Does the command purchase and use only those HM listed on the AUL?			
21. Are training and inspection records maintained and available for inspection?			
22. Has the command updated the AUL as new HM are introduced into the workplace?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____