

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 Transportation

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for the management of hazardous waste transportation.

2.0 APPLICATION

This guidance applies to those individuals who are involved with hazardous waste transportation 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) from organizations aboard MCAGCC. These collections are often referred to as milk runs. The Manager, HWMS prepares and promulgates HW accumulation, handling, and turn in procedures for MCAGCC. The HWMS manages interim storage and preparation of HW for off-site disposal in accordance with all applicable HW regulations including proper containerization, labeling, documentation, and adherence to the 90-day HW storage limit.

4.2 Operational Controls:

The following procedures apply for HW Transportation:

1. Ensure Satellite Accumulation Areas (SAAs) are readily available to collect hazardous waste (HW) without interference.

2. Ensure HW at SAAs is collected at the scheduled times.
3. Ensure HW containers contain only HW.
4. Wear Personal Protective Equipment (PPE) applicable to your duties when collecting HW.
5. Ensure PPE is easily located on your vehicle in case of a health hazard.
6. Maintain and operate the collection vehicle and any other equipment applicable to your duty in strict accordance with the manufacturer's recommendations.
7. Collect, store and contain HW in accordance with CCO 5090.5_, to include:
 - a. proper labeling,
 - b. proper marking,
 - c. proper storage 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.
9. Ensure logbooks are maintained for internal documentation as requested by HWMS
10. Keep a spill kit on vehicle in case of accidental spills or releases.
11. Keep fire extinguisher nearby.
12. Ensure turnover folder information is maintained for this Standard Operating Procedure (SOP).
13. If there are any specific situations or other concerns not addressed by this procedure, contact MCAGCC Natural Resources and Environmental Affairs 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. General Environmental Awareness training.
2. Hazard Communication training/Globally Harmonized System.
3. SOP for Hazardous Waste Operations, Hazardous Waste Operations Manual.
4. Initial 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Course and annual 8-hour refresher training.
5. Licensed or certified driver's license for applicable vehicles.

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 noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet. NREA's Compliance Support Branch shall conduct quarterly inspections. Refer to Hazardous Waste Operations Manual.

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

Inspection Items	Yes	No	Comments
1. Are personnel trained and certified as required by their hazardous waste (HW) collection duties?			
2. Is HW in the SAA picked up at the scheduled time? (within 72 hours of accumulation)			
3. When performing HW collection aboard the installation, is PPE being worn as follows: a. hard hat, b. steel toe boots, c. gloves (protective against HW and sharp objects), d. goggles or safety glasses with splash protection, e. and coveralls.			
4. Is PPE easily located on your vehicle in case of a health hazard/emergency incident?			
5. Is the vehicle and equipment used for HW collection being operated by certified and trained personnel?			
6. Is proper signage posted on vehicle (e.g. "No Smoking")?			
7. Is HW collected, stored and contained in accordance with 40 CFR, to include: a. proper labeling, b. proper marking, c. proper storage containment (e.g. metal or poly drum), d. lids closed at all times unless adding or removing waste?			
8. Are compatible fire extinguishers available and maintained in a serviceable condition?			
9. Is PPE on-hand and in a serviceable condition?			

Inspection Items	Yes	No	Comments
10. Are drums and containers on vehicles free of leaks and damage?			
11. Are markings and labels on all containers present, legible, and appropriately completed?			
12. Is HW separated by chemistry and stored in appropriate HW handling containers?			
13. Are containers closed and wrenched tight?			
14. Is the proper Initial Date of Accumulation (IDOA) marked on each drum?			
15. Is Accumulation Start Date (ASD) filled out on all labels? (on vehicle)			
16. Are all incidental releases that occurred during filling operations properly cleaned up?			
17. Are training and inspection records maintained and available for inspection?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Hazardous Waste Manager

Name: _____

Signature: _____

Date: _____