

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>
File Name: PCB-ESOP	Effective Date: 1 January 2016	Document Owner: NREA	

Title: PCB (polychlorinated biphenyl) Item Disposal

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for the disposal of PCB items.

2.0 APPLICATION

This guidance applies to those individuals disposing of PCB items 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)
- Environmental Regulation Notice (ERN) 06-01
- 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:

Because of their hazardous waste characteristics, items containing or contaminated with PCBs must be disposed of properly. PCBs can cause serious harm to human health and the environment. It is critical that all precautions are taken to lessen the environmental impact of PCBs.

Ensure that only containers with lids are used when collecting or transferring fluids that contain PCBs. Transfer and collection containers without lids are not authorized for use aboard MCAGCC.

4.2 Operational Controls:

The following procedures apply for HW Transportation:

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

2. Any material containing PCBs must be managed and disposed of as hazardous waste, including:

- a. fluorescent light ballasts/tubes,
- b. light switches.
- c. electrical transformers
- d. electrical components

3. Any item that may potentially contain PCBs, but that does not have a label, must be managed and disposed of as hazardous waste, including:

- a. fluorescent light ballasts/tubes
- b. light switches
- c. transformers
- d. electrical components.

4. Ensure the following actions shall be adhered to in the disposition of electrical distribution system equipment:

a. Test Method EPA 800 (PCB) shall be analysis utilized by State of California certified laboratory.

b. If the analysis results for any item is less than 5.0 parts per million, the following action shall occur:

- (1) The oil from the item shall be drained into a closed-top 55-gallon steel drum.
- (2) The drum shall be marked with the words "NON- PCB Contaminated" and corresponding electrical item serial numbers that were drained into the drum.
- (3) The drained electrical item shall be marked with the words "NON- PCB Contaminated", and serial number of the item.
- (4) The exterior of the drum and the item must be free of any oil residue.
- (5) All debris utilized to sample, drain, or clean the exterior of the drum shall be packaged in an opened top-drum and marked "NON_PCP Contaminated."
- (6) The NON-PCB drum, item, and laboratory analysis shall be turned into the Natural Resources and Environmental Affairs (NREA) Division Hazardous Waste Management Section, Building 2094.
- (7) If an electrical item contains PCB oil, it must be tested to determine whether it is positive or negative.

c. If the analysis results for any item is greater than 5.0. parts per million (the follow action shall occur:

- (1) The oil from the item shall be drained into a closed-top 55-gallon steel drum.
- (2) The drum shall be marked with the words "PCB Contaminated" and corresponding electrical item serial numbers that were drained into the drum.
- (3) The drained electrical item shall be marked with the words "PCB Contaminated", the concentration of PCBs (to include Non-Detect), date of analysis, and serial number of item.
- (4) The exterior of the drum and the item must be free of any oil residue.
- (5) All debris utilized to sample, drain, or clean the exterior of the drum shall be package in an opened top-drum and marked "PCB Contaminated".
- (6) The PCB drum, item, and laboratory analysis shall be turned into the NREA Division Hazardous Waste Management Section, Building 2094

5. Keep a spill kit nearby.
6. Keep fire extinguisher nearby.
7. Keep PPE (Personnel Protective Equipment) on hand.
8. Turnover folder information must be kept for this Standard Operating Procedure (SOP).
9. If there are any specific situations or other concerns not addressed by this procedure, contact MCAGCC 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.

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:

The Environmental Compliance Coordinator (ECC) shall designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet.

PCB Item Disposal – Inspection Checklist

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

Inspection Items	Yes	No	Comments
1. Are all applicable SDS's readily available and current?			
2. Have personnel involved in the process of PCB recovery and disposal received appropriate training?			
3. Are all materials containing PCBs managed and disposed of as hazardous waste, including: a. fluorescent light ballasts/tubes, b. electrical transformers, c. electrical components?			
4. Are all items that potentially contain PCB and that do not have a label being managed and disposed of as hazardous waste, including: a. fluorescent light ballasts/tubes, b. electrical transformers, c. electrical components?			
5. If an electrical transformer contains PCB oil, has it been tested to determine whether it greater or less than 5.0 part per million?			
6. Are items that do not contain PCBs, or items that test less than 5.0 part per million for PCBs, being disposed of as solid waste and/or scrap metal?			
7. Are items that contain PCBs, or items that test greater than 5.0 part per million for PCBs, being disposed of as hazardous waste?			
8. Is there evidence of spills, leaks, or unauthorized dumping?			
9. Are drums and containers free of leaks, damage, and misuse?			
10. Are markings and labels on all containers present, legible, and appropriately completed?			
11. Are wastes in compatible containers and not mixed?			

Inspection Items	Yes	No	Comments
12. Are all drum bungs and self-closing lids present and serviceable?			
13. Are all liquid drum wastes contained in a non-leaking secondary containment?			
14. Is the proper Initial Date of Accumulation (IDOA) on each drum?			
15. Is a spill kit maintained near potential spill areas?			
16. Is there a fire extinguisher stored near potentially flammable materials?			
17. Is PPE kept near any areas with potential health hazards?			
18. Are training and inspection records maintained and available for inspection?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____