

Environmental Standard Operating Procedure

Originating Office: Natural Resources Environmental Affairs Office	Revision: 25 September 2014 Supersedes: 01 April 2013	Prepared By: Subject Matter Expert (SME)	Approved By: AST/UST Manager
File Name: BPO-ESOP	Effective Date: 01 October 2014	Document Owner: NREA	

Title: Burn Pit Operations

1.0 PURPOSE

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for operations and training at the burn pit.

2.0 APPLICATION

This guidance applies to those individuals who are involved in operations and training at the burn pit aboard Marine Corps Air Ground Combat Center, (MCAGCC).

3.0 REFERENCES

- Code of Federal Regulations – Title 29, (29 CFR)
- Code of Federal Regulations – Title 40, (40 CFR)
- California Regional Water Quality Control Board Order No. R7-20002-0138
- MCAGCC Permit to Operate (PTO)
- Combat Center Order 5090.5C, Integrated Contingency and Operations Plans (ICOP) for Marine Corps Air Ground Combat Center

4.0 PROCEDURE

4.1 Discussion:

The burn pit is only to be utilized by appropriate personnel for training the procedures for extinguishing fires aboard MCAGCC. This training involves controlled and simulated burns that may result in impacts to the environment. Procedures outlined in this ESOP must be followed to minimize environmental impacts.

4.2 Operational Controls:

The following procedures apply:

1. Ensure MSDS/SDSs are made readily available and current.
2. Ensure this operation has a current Permit to Operate (PTO) before conducting training.
3. Ensure PTO is posted and all conditions are being followed.

4. Ensure the burn pit's physical dimensions and containment systems are in compliance with the PTO.
5. Ensure Aboveground Storage Tanks (ASTs) are in compliance with all applicable regulations, to include used and unused material.
6. Ensure Oil/Water Separator (OWS) is in compliance with MCAGCC regulations. Refer to OWS ESOP.
7. Ensure both sump and oil pumps are properly maintained.
8. Ensure waste water tank is adequately filled prior to conducting training.
9. Request permission 24 hours prior to commencing each live fire and/or smoke training exercise. Contact Natural Resources and Environmental Affairs (NREA) Division's Air Resources Manager.
10. Use only off-specification and clean product fuel.
11. No other liquids can be used unless written permission is granted by MDAQMD.
12. Wear proper PPE (Personal Protective Equipment) when conducting live training exercise and for post clean-up.
13. Only approved control agents will be used during live training.
14. Maintain a spill kit near training exercise areas.
15. Dispose of all hazardous waste and/or solid waste created during training exercises in accordance with MCAGCC regulations.
16. Maintain written logbook and records on-site for at least 2 years. The logbook shall contain:
 - a. Time and duration of each training exercise,
 - b. Type and quantity of all materials burned,
 - c. Type and quantity of smoke agent used,
 - d. Unit(s) or group(s) being trained,
 - e. Purpose of the training exercise,
 - f. Number of persons trained,
 - g. Person authorizing the training exercise.
17. The owner/operator must determine the amount of criteria and toxic pollutants emitted from the live fire burn and keep this information on hand for reporting purposes.
18. Maintain an annual written certification verified and signed by a California Registered Engineer or Certified Engineering Geologist that states all original design criteria.
19. Checked the following after each burn day:
 - a. The amount of liquid in the sump between the two (2) liners of the burn pit.
 - b. The amount of liquid in the sump beneath the line that connects the burn pit and the oil water separator.

- c. The waste oil tank level.
 - d. Inspection of the ground beneath the 15,000 gallon AST for leakage from the tank.
 - e. Ensure the valve that drains the contents of the burn pit to the oil water separator is closed and secure.
 - f. Ensure amount of liquid in 15,000 gallon AST will meet the amount needed for the next Fire Fighting evolution
20. Maintain Turnover folder information for this Environmental Standard Operating Procedure (ESOP).
 21. 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:

1. MSDS/SDSs for Hazardous Material being stored.
2. Inspection and training records.
3. Logbook maintained on-site for at least 2 years containing:

4.4 Training:

All affected personnel must be trained in this Environmental Standard Operating Procedure (ESOP) and the following:

1. Hazard Communication training.
2. General Environmental Awareness training.
3. All applicable training as it pertains to Fire Training.

4.5 Emergency Preparedness and Response Procedures:

Refer to Combat Center Order (CCO) 5090.5C, Integrated Contingency and Operations Plans (ICOP) for Marine Corps Air Ground Combat Center.

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.

Burn Pit Operations – ECC/Unit Inspection Checklist

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

Inspection Items	Yes	No	Comments
1. Are all MSDS/SDSs readily available and current?			
2. Is the PTO posted and are all conditions being met?			
3. Are ASTs maintained and in compliance according to applicable regulations?			
4. Is the Oil/Water Separator maintained and in compliance with MCAGCC regulations?			
5. Are both the oil and sump pumps used in the process of fire training maintained and in compliance with MCAGCC regulations?			
6. Is the waste water tank adequately filled prior to training?			
7. Is only off-specification and/or clean product fuel used at the facility?			
8. Were other liquids used other than the fuel referenced in #7; and if so, was written permission given by MDAQMD and/or CRWQCB?			
9. Was the MDAQMD or CARB notified 24 hours prior to commencement of training?			
10. Is proper PPE being worn when conducting live training exercises, post clean-up and controlled release clean-up?			
11. Is a spill kit maintained near training exercise areas?			
12. Are all hazardous wastes and/or solid wastes created during training exercises disposed of according to MCAGCC regulations?			
13. Is a logbook maintained on site for at least 2 years consisting of: <ul style="list-style-type: none"> a. Time and duration of each training exercise, b. Type and quantity of all materials burned, c. Type and quantity of smoke agent used, d. Unit(s) or group(s) being trained, e. Purpose of the training exercise, f. Number of persons trained, g. Name of the person authorizing the training 			

Inspection Items	Yes	No	Comments
exercise?			
14. Are training and inspection records maintained and available for inspection?			
15. Has an annual written certification verified and signed by a California registered Engineer or Certified Engineering Geologist been performed?			
16. Have all the conditions of Order No. R7-200002-0138 been met?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____