

Environmental Standard Operating Procedure

Originating Office: Natural Resources and Environmental Affairs Office	Revision: N/A	Prepared By: NREA Subject Matter Expert (SME)	Approved By: Patrick Mills <i>Patrick Mills</i>
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Title: Hazardous Waste Satellite Accumulation Area (SAA)

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for proper management of Hazardous Waste Satellite Accumulation Areas (SAAs).

2.0 APPLICATION

This guidance applies to those individuals who are working with hazardous waste SAA's 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:

A SAA is a site for the temporary accumulation of HW at or near the point of generation. A SAA consist of the following: a portable or permanent secondary containment area, containers for the storage of hazardous waste, and bulk waste storage containers. The improper accumulation and storage of hazardous waste is the most recurring violation issued by regulatory agencies. Individual units and the Natural Resources and Environmental Affairs (NREA) Division Hazardous Waste Management Section (HWMS) must work together to ensure that SAA regulatory requirements are met.

Units aboard MCAGCC accumulate hazardous waste and temporarily store them in the SAA or a designated waste storage location. Individual units are responsible for overall site cleanliness and for ensuring that hazardous waste is paced in the correct hazardous waste container. The HWMS is responsible for ensuring that hazardous waste storage containers are serviceable, functional, labeled, and are annotated IAW regulatory requirements.

The HWMS shall ensure that hazardous waste at the SAAs is collected according to regulations. The HWMS is responsible for the completion of the required operational and weekly site inspections. The HWMS shall assist individual units in designating SAA site locations. For information on requesting and establishing a SAA, refer to HWOM and CCO 5090.5C

1. Operational Controls:

The Hazardous Waste Management Section (HWMS) and individual units requiring/operating SAA have dual operational controls and responsibilities. HWOM establishes operational controls and procedures. The following operational controls and procedures are established for the HWMS and individual units:

1. HWMS shall:

- a. Provide secondary containment, and properly labeled storage containers for each waste stream within the SAA.
- b. Provide pick-up service to the SAA within a time frame not to exceed 72-hours for containers smaller than 85-gallons and not to exceed 45-days for storage tanks.
- c. Provide replacement hazardous waste containers to the SAA if removed or requested for newly generated waste streams.
- d. Train unit operators in the proper placement of hazardous waste into the appropriate containers.
- e. Perform operational and weekly inspections.
- f. Provide service and repairs to bulk storage containers and tanks.
- g. Provide the necessary clean-up of incidental releases that occur during the pick-up, inspection, and maintenance services.

2. Individuals Units shall:

- a. Ensure all operators receive proper training from HWMS on placement of hazardous waste in the containers.
- b. Provide compatible fire extinguishers and “No Smoking” signs for the SAA.
- c. Ensure adequate spill kits are located near the SAA and in the area where hazardous material is used and hazardous waste is generated. Replenish spill kits as necessary.
- d. Provide the necessary clean-up of incidental spills on the tops, sides, and area around hazardous waste containers.
- e. Ensure that all hazardous waste accumulation containers remain in the SAA.

- f. Place all hazardous waste in designated waste containers.
- g. Prohibit the moving or the removal of containers from the SAA.
- h. Ensure secondary containment is free of any liquid, spilled material, or debris.
- i. Notify the HWMS at 830-7244 if containers require service prior to the 72-hour collection period.
- j. Mark empty containers with the word “Empty”, last known content, and the date it the container became empty.
- k. Ensure transfer containers are marked for specific waste stream and remain covered when not in use.
- l. Ensure that Lead Acid battery caps and post are taped and annotated with the date removed from service. Individual batteries may be placed within the SAA or palletized taped batteries are to be taken the Hazardous Waste Accumulation Area.
- m. Ensure that bulk waste such as palletized taped batteries, soil, floor sweep, and assorted debris (sandbags, wood, etc.) contaminated with a petroleum product are turned into the Hazardous Waste Accumulation Area for proper disposal.
- n. Contact the HWMS if additional drums are needed for newly generated waste streams.

2. Documentation and Record Keeping:

1. Inspection and training records. Refer to HWOM and CCO 5090.5A for documentation and record keeping requirements.

4.4 Training:

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

1. Hazard Communication training
2. General Environmental Awareness training
3. Hazardous Waste Operations Manual procedures for SAA and Bulk Containers.
4. Hazardous Waste Operations and Emergency Response (HAZWOPER) Course. (See below Note)
5. Department of Transportation for Hazardous Waste. (See below Note)

Note: Items 4 and 5 apply only to HWMS personnel.

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) and HWMS shall designate personnel to perform operational and weekly inspections respectively. The Supervisor of the HWMS has the overall responsibility to ensure that the mandated weekly inspection requirements are met. The ECC and HWMS shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet.

1. Site operational inspections shall be conducted upon arrival at an SAA site and prior to servicing by HWMS's personnel.
2. Weekly compliance inspections to include Drums and Above Ground Storage Tanks (ASTs) shall be performed by HWMS's and unit's designated personnel. The weekly inspection sheet to include discrepancies shall be maintained in the SAA folder.

**Hazardous Waste Satellite Accumulation Area
Inspection Checklist
HWMS's Responsibilities**

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

Inspection Items	Yes	No	Comments
1. Have personnel received the appropriate level of training? (40 CFR 262.34 (d)(5)(iii)) & (22 CCR 66264.16 (a)(i)(2))			
2. Are records available of all required inspections (i.e., operational, weekly, and quarterly) and actions taken to correct noted deficiencies? (MCO P5090.2A 9104.1(k)(5))			
3. Is there an adequate spill kit located near the SAA? (MCO P5090.2A 9104(1)(a))			
4. Is the area free of spills, leaks, and debris? (CCO 5090.5A)			
5. Are SAA's temporary or permanent secondary containment serviceable? (CCO 5090.5A)			
6. Are all liquid HW in a secondary containment? (40 CFR 267.173(a))			
7. Are all solid HW that do not have primary containment (ammo boxes, fuel bladders, etc) in a covered primary containment container? (CCO 5090.5A)			
8. Are containers and bulk storage containers in good condition (free of dents and corrosion, not bulging, or otherwise deteriorating)?(40 CFR 267.197)			
9. Are containers missing or being misused per design? (40 CFR 262.34(a))			
10. Are contents compatible with the container? (40 CFR 267.171(b))			
11. Are container tops free of spillage? (CCO 5090.5A)			
12. Are containers properly closed? (CCO 5090.5A)			
13. Are markings and labels on all containers and bulk storage units present, legible, and appropriately completed and have the words "Hazardous Waste" and its content on the container? (40 CFR 262.31) & (CCR 22/4.5/12/3/66262.32)			

Inspection Items	Yes	No	Comments
14. Is the proper Initial Date of Accumulation (IDOA) marked on each HW container and bulk storage unit? <i>(40 CFR 262.34(a)(2))</i>			
15. Are empty containers marked with the date they became empty, the word "empty" and the last known contents? <i>(CCO 5090.5A Annex 10 (4-1))</i>			
16. Are lead acid batteries' caps and posts taped and stored in a manner to prevent leakage? <i>(40 CFR 273.2)</i>			
17. For bulk waste containers, are hoses, couplings, vent caps, and fill caps free of leaks, cracks, or breaks? <i>(40 CFR 267.197)</i>			
18. Is the interstitial space monitoring device on bulk waste containers serviceable and is reading non-detect? <i>(40 CFR 267.199)</i>			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

HWMS Supervisor

Name: _____

Signature: _____

Date: _____

**Hazardous Waste Satellite Accumulation Area
Inspection Checklist
Unit's Responsibilities**

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

Inspection Items	Yes	No	Comments
1. Have Unit personnel received the appropriate level of training? <i>(40 CFR 262.34(d)(5)(iii) & (22 CCR 66264.16(a)(i)(2))</i>			
2. Are "No Smoking" signs posted? <i>(CCO 5090.5A)</i>			
3. Is there a compatible fire extinguisher nearby and is it maintained in a serviceable condition? <i>(MCO P5090.2A 9104.1(a))</i>			
4. Is there an adequate spill kit nearby? <i>(CCO 5090.5A, Annex 10, 3.2.1)</i>			
5. Is there no evidence of spills, leaks, or unauthorized dumping present? <i>(CCO 5090.5A)</i>			
6. Are incidental releases properly cleaned up? <i>(CCO 5090.5A)</i>			
7. Are drums and containers not leaking, damaged, misused, or missing from the SAA? <i>(40 CFR 267.197)</i>			
8. Are wastes in their proper compatible containers and not mixed? <i>(40 CFR 267.197)</i>			
9. Are lead acid batteries marked and fill caps and posts taped? <i>(40 CFR 273.13(a))</i>			
10. Are non-intact Lead Acid Batteries (missing caps, leaking or cracked), packaged in an open-top polyethylene drums for turn-in to the HWAA? <i>(40 CFR 273.33(A)(i))</i>			
11. Are empty containers marked with the date they became empty, the word "empty" and the last known contents? <i>(CCO 5090.5A, Annex 10, 4.1)</i>			
12. Are secondary containments and SAA area free of excess dirt and debris? <i>(40 CFR 267.172 & 267.173(b)(5))</i>			

Inspection Items	Yes	No	Comments
13. Is the drain on the secondary containment closed? (CCO 5090.5A)			
14. Are hoses, couplings, vent caps, and fill caps free of leaks, cracks, or breaks for bulk waste ASTs? (40 CFR 267.197)			
15. Is the interstitial space monitoring device on bulk waste containers serviceable and is reading non-detect? (40 CFR 267.199)			
16. Are all HWs placed in the SAA area? (CCO 5090.5A)			
17. Are transfer containers properly managed? (CCO 5090.5A)			
18. Are training and inspection records maintained and available for inspection? (MCO P5090.2A 9104.1(a)(1))			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____