

Environmental Standard Operating Procedure

Originating Office: Natural Resources and Environmental Affairs Office	Revised: 31 December 2015 Supersedes: 8 October 2014	Prepared NREA, Subject Matter Expert (SME)	Approved By: Branch Head, P2
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Title: Hazardous Consolidation Point (HCP) Operations

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for proper storage of hazardous materials at the HCP.

2.0 APPLICATION

This guidance applies to those individuals who store hazardous materials at the HCP 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)
- California Code of Regulations – Title 22, (22 CCR)
- MCO 4450.12.A
- MCO P5090.2A Ch. 3
- NAVOSH (Navy Occupational Safety and Health) HM (Hazardous Material) Compatibility Chart
- Hazardous Waste Operations Manual, MCAGCC
- Combat Center Order 5090.5C, Integrated Contingency and Operations Plans (ICOP) for MCAGCC
- Spill Prevention, Control, and Countermeasures Plan (SPCC)

4.0 PROCEDURE

4.1 Discussion:

The storage and handling of hazardous materials must be properly managed to ensure that uncontrolled releases do not occur. Uncontrolled releases due to improper storage could result in impacts to human health and the environment. Hazardous materials must be segregated and stored in authorized containments or storage lockers that are compatible with the chemical properties of the material being stored. These guidelines also apply to bulk storage inside warehouses as well as hazardous material stored for resale.

4.2 Operational Controls:

The following procedures apply:

1. SDS must be readily available and current for all HM used or stored within the HCP.
2. Personnel who work within the HCP must be:
 - a. Properly trained in their specific work areas as it pertains to storage of bulk HM or retail HM
 - b. Trained in HazCom standards/Globally Harmonized System
 - c. Trained in the procedures for responding to an accidental spill
3. Store HM only in approved containments or storage lockers authorized for use aboard MCAGCC.
4. Identify and label each HM locker with the properties of its contents (e.g., Flammable, Poisons, Corrosive, etc.).
5. Label HM storage containers with the common name (e.g., Windex, CLP, bleach, etc.) of the material stored inside.
6. Maintain adequate aisle space (36") between containers to facilitate ease of access and movement.
7. Clean up spills as per MCAGCC Abatement ESOP.
8. Store all retail HM products for sale in an appropriate fashion to ease process of identification (e.g., soaps separated from window cleaners, etc.).
9. Store all retail HM products for sale in an appropriate fashion to avoid mixing of incompatible material (e.g., ammonia and bleach will not be stored together).
10. Store all retail flammable (e.g., petroleum, oil and lubricants (POL), paints, etc.) products with PPE (Personal Protective Equipment) readily available.
11. Store all flammable (e.g., petroleum, oil and lubricants (POL), paints, etc.) in a flammable material storage locker or approved containment when storing these materials outdoors.
12. Ensure that flammable material storage lockers are equipped with self-closing doors and a top and bottom vent when storing hazardous material outdoors.
13. Ensure that spill kits and serviceable fire extinguishers are readily available.
14. Ensure that weekly inspections are being conducted.
15. Ensure that all products being sold for retail are on the authorized use list (AUL) and only those HM listed on the AUL are procured.

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

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

4.3 Documentation and Record Keeping:

The following records must be maintained when storing hazardous material:

1. SDS for all hazardous material.
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, Subject: Integrated Contingency and Operations Plans (ICOP) for Marine Corps Air Ground Combat Center and MCAGCC Abatement ESOP.

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.

HCP Operations – ECC/Inspection Checklist

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

Inspection Items	Yes	No	Comments
1. Is SDS available and current for all hazardous material stored?			
2. Have unit personnel received appropriate level of training as it applies to their work section at the HCP including: <ul style="list-style-type: none"> a. Proper training in their specific work areas as it pertains to their duties, b. Proper training in storage of bulk HM or retail HM, c. Proper training in Haz-Com standards, d. Proper training in the procedures for responding to an accidental spill? 			
3. Are all HM, including retail HM, stored in a compatible manner according to Marine Corps regulations and Naval Compatibility Chart?			
4. Are all HM, including retail HM, stored in appropriate containers per their contents (e.g., acid stored in poly drum versus metal drum)?			
5. Are all retail HM products displayed in an appropriate fashion to ease process of identification (e.g., soaps separated from window cleaners, etc.)?			
6. Are all retail HM products displayed in an appropriate fashion to avoid mixing of incompatible material (e.g., ammonia and bleach will not be stored together)?			
7. Does the facility or work site store flammable or otherwise combustible paint in accordance with guidance given by the installation?			
8. Are HM labels legible?			
9. Is personnel protective equipment (PPE) on hand and serviceable?			
10. Are manufactures labels legible?			

Inspection Items	Yes	No	Comments
11. Is HM within shelf life?			
12. Are all bulk HM containers managed to prevent leakage to include retail HM products?			
13. Are compatible fire extinguishers available and functional?			
14. Are spill kits on hand and serviceable?			
15. Are eyewash stations on hand and serviceable?			
16. Is a copy of the unit's spill contingency plan readily available, if applicable?			
17. Does the command possess a current Authorized Use List (AUL)?			
18. Does the command purchase and use only those HM listed on the AUL?			
19. Are training and inspection records maintained and available for inspection?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____