Environmental Standard Operating Procedure (ESOP) Central Accumulation Area, Portable Containers Environmental Affairs (EA): Hazardous Waste Manager (760) 830-5403

Subject: CENTRAL ACCUMULATION AREA, PORTABLE CONTAINERS

References: (a) Code of Federal Regulations, Title 40

- (b) California Code of Regulations, Title 22
- (c) Integrated Contingency and Operations Plan
- 1. <u>Purpose</u>. This document provides environmental protection guidance for the operation and management of liquid hazardous waste in 240-gallon portable containers placed in a central accumulation area (CAA).
- <u>Application</u>. This guidance applies to personnel working with or managing hazardous waste, 240-gallon, portable containers aboard the Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) Twentynine Palms. For further references to MAGTFTC, MCAGCC in this document, the term "installation" will be used.
- 3. <u>Procedures</u>. Proper management of hazardous waste, portable containers reduce the risk to human health and the environment. Portable containers aboard the installation must be effectively managed to ensure compliance with all applicable federal, state, and local regulations. Improper management of portable containers can result in adverse regulatory action, such as monetary fines, penalties, and other enforcement actions, which may affect the installation mission.
- 4. <u>Operational Controls</u>. Facilities aboard the installation that have portable containers used for the storage of liquid hazardous waste must ensure that the containers are operationally sound before, during, and after each use.

The following controls apply:

- a. Confirm that hazardous waste stored in 240-gallon portable containers are collected by Hazardous Waste Management Branch (HWMB) personnel on a weekly basis or more frequently, as dictated by operational tempo.
- b. Confirm that daily visual inspections are performed by the activity that the CAA has been provided to. Maintain inspection records for a minimum of 3 years.
- c. Confirm that portable containers are in good condition with no evidence of spills, leaks, or unauthorized dumping. Confirm fittings are in good condition with no signs of damage cracking, corrosion, or discoloration.
- d. Do not add liquid waste into the interstitial monitoring space.

- e. Confirm that coating (paint) of the portable container is in good condition with no signs of bubbling, cracking, or corrosion.
- f. Confirm that plugs, vents, and piping is not made of polyvinyl chloride or plastic.
- g. Confirm that container supports, and arresting straps (if applicable) are in good condition.
- h. Confirm that the containers' foundation is sound and stable, with no visible signs of erosion, settling, or severe cracking.
- i. Confirm that fill caps and vent caps are in place and functioning properly.
- j. Confirm that piping, hoses, and connections are in good condition with no signs of leaks, corrosion, or damage.
- k. Confirm that pumps and valves are in good working condition with no signs of leaks or discoloration around equipment.
- 1. Confirm that the product-level gauge is functioning properly.
- m. Confirm that interstitial leak detection gauge is serviceable and read as nondetect.
- n. Confirm that secondary containment is in good condition with no signs of leaking (if applicable).
- o. Check secondary containment for visible signs of leakage from primary containers into secondary containment. Confirm that the area is free of any water, oils/fuel, sand, trash, or vegetation (if applicable).
- p. Confirm that "No Smoking" signs are affixed to each portable container.
- q. Annotate any abnormal conditions found during weekly inspections and their corrective actions undertaken. Report all maintenance related issues to the Hazardous Waste Management Branch via phone at 760-830-7244.
- r. If there are specific situations or other concerns not addressed by this procedure, contact the Hazardous Waste Management Branch via phone at 760-830-7244.
- 5. Documentation and Record Keeping. The following records must be maintained:
 - a. Safety data sheets for product stored in portable containers
 - b. Training records for this practice, for three calendar year
 - c. Maintain daily inspection records for three calendar year

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- 6. <u>Training</u>. All affected personnel must be trained in this document and the following:
 - a. General Environmental Awareness training
 - b. Globally Harmonized System training
- 7. Emergency Preparedness and Response Procedures. Refer to the spill response procedures listed in the Abatement ESOP and Code of Federal Regulations, Title 40.
- 8. Inspection and Corrective Action. The Environmental Compliance Coordinator (ECC) will confirm unit adherence to this ESOP. The ECC will confirm that unit personnel are trained in this ESOP and maintain appropriate documentation in accordance with this ESOP.