

Environmental Standard Operating Procedure (ESOP)	
Hazardous Waste Satellite Accumulation Area (SAA)	
Environmental Affairs (EA): Hazardous Waste Management Branch (HWMB) 830-7244, 830-5403	Revised: Update 1 October 2024

Subject: HAZARDOUS WASTE SATELLITE ACCUMULATION AREA

References: (a) Integrated Contingency and Operations Plan
(b) Marine Corps Air Ground Combat Center (MCAGCC), Hazardous Waste Operations Manual

1. Purpose. This document provides environmental protection guidelines for the management of the SAA.
2. Application. This guidance applies to those personnel who are actively involved with hazardous waste (HW) SAA practice aboard Marine Air Ground Task Force Training Command (MAGTF TC), Marine Corps Air Ground Combat Center (MCAGCC) Twentynine Palms. For further references to MAGTF TC, MCAGCC in this document, the term "installation" will be used.
3. Procedures. The SAA is a site for the temporary accumulation of HW at or near the point of generation. A SAA consists of the following: a portable or permanent secondary containment area, containers for the storage of HW, and bulk waste storage containers. Improperly accumulating and storing HW is the most recurring violation by regulatory agencies. Individual units and EA Division HWMB, must work together to confirm that SAA regulatory requirements are met.
 - a. Units aboard the installation accumulate HW and temporarily store them in SAA or a designated waste storage location. Individual units are responsible for overall site cleanliness and for confirming that HW is placed in the correct containers. The HWMB is responsible for confirming that HW storage containers are serviceable, functional, labeled, and annotated in accordance with regulatory requirements.
 - b. The HWMB is responsible for collecting HW from the SAA site except for lead acid batteries and contaminated soil. Those items are to be brought to the HW facility by the generating units in government vehicles.
4. Operational Controls. The following procedures apply for HW SAA:
 - a. References (a) Integrated Contingency and Operations Plan and (b) Hazardous Waste Operations Manual
 - b. Used Battery Management:
Lead Acid Battery:
 - Tape battery terminals to prevent arcing
 - Load batteries onto a wooden pallet one layer high
 - Transport used batteries to HWMB, Building 2095, for disposal

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5. Documentation and Record Keeping. The following records must be maintained for this document:
 - a. Safety data sheets for all HW being stored.
 - b. Inspection records (must be maintained for 3 years)
6. Training. All affected personnel must be trained in this document and the following:
 - a. General Environmental Awareness training
 - b. Hazardous Waste Operations Manual
 - c. Globally Harmonized System training
 - d. 40-hour HW Operations and Emergency Response course
7. Emergency Preparedness and Response Procedures. Refer to the Integrated Contingency and Operations Plan and the spill response procedures listed in the Abatement ESOP.
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.

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Hazardous Waste Satellite Accumulation Area (SAA) - Unit Inspection Checklist	
Date:	Time:
Unit:	Work Center:
Inspector Name:	Signature:

Inspection Items	Yes	No	Comments
Administrative			
1. Have personnel received the appropriate level of training?			
2. Are "No Smoking" signs posted?			
3. Is a compatible fire extinguisher nearby and maintained in a serviceable condition?			
4. Is there an adequate spill kit containing personal protective equipment nearby?			
5. Is there evidence of spills, leaks, or unauthorized dumping present?			
6. Are all releases properly cleaned up?			
7. Are any drums or containers leaking, damaged, misused, or missing from the SAA?			
8. Are wastes in their proper compatible containers and not mixed?			
9. Are lead acid batteries marked and terminals taped?			
10. Are damaged lead acid batteries with missing caps, leaks, or cracks packaged in open-top polyethylene drums for turn-in to the Hazardous Waste Management Branch?			
11. Are empty containers marked with the word "Empty" the date they became empty, and the last known contents?			
12. Are secondary containments and SAA free of standing fluids, excess dirt, and debris?			
13. Is the drain on the secondary containment closed?			
14. Are HWs placed within the SAA?			
15. Are transfer containers properly managed?			
16. Are training and inspection records maintained and available for inspection?			

Additional Comments:

Corrective Action Taken:

Unit Inspector:

Name: _____

Signature: _____