

Environmental Standard Operating Procedures (ESOP)	
Hazardous Waste Accumulation Area (HWAA) (Less than 90 Day Site)	
Environmental Affairs (EA): Hazardous Waste Management Branch (HWMB) (760) 830-7244	Revised: 1 October 2023

Subj: HAZARDOUS WASTE ACCUMULATION AREA (LESS THAN 90 DAY SITE)

Ref: (a) CCO 5090.5D, Integrated Contingency and Operations Plan
(b) Hazardous Waste Operations Manual, MCAGCC

1. Purpose. This document provides environmental protection guidelines for the management of the HWAA (Less than 90 Day Sites).

2. Application. This guidance applies to those personnel working within the HWAA (Less than 90 Day Site) aboard 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. Procedures. The HWAA is operated by HWMB, EA Division. The supervisor of the HWMB prepares and promulgates hazardous waste (HW) accumulation, handling and turn-in procedures for the installation. The HWMB is responsible for collecting and receiving HW from organizations throughout the installation. The HWMB is responsible for recycling, treatment, reduction, and reuse of California listed waste within one year from accumulation. Additionally, the HWMB is responsible for the less than 90-day storage of HW and off base shipment and disposal of HW. HWMB shall ensure adherence to all applicable HW regulations, including the proper containerization, labeling and documentation. HWMB shall ensure observance to the 90-day storage limit for non-recyclable/treatable for HW, and for the proper recycling, treatment, reduction, and reuse of California listed HW. HWMB shall reference the most current version of reference (a) and (b) for the installation regarding the HWAA operation.

4. Operational Controls. The following controls apply:

Refer to the most current version of reference (a) and (b) for the Installation for operation controls and procedures.

5. Documentation and Record Keeping. The following records must be maintained:

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. Reference (b).
- c. Globally Harmonized System training.

Subj: HAZARDOUS WASTE ACCUMULATION AREA (LESS THAN 90 DAY SITE)

d. 40-hour Hazardous Waste operations and Emergency Response Course.

7. Emergency Preparedness and Response Procedures. Refer to reference (a) and spill response procedures listed in the Abatement ESOP.

8. Inspection and Corrective Action. Daily, weekly, and quarterly inspections are required at the HWMB Location. The HWMB manager or designee shall have the overall responsibility to ensure that daily and weekly inspection requirements are met. The HWMB Manager shall ensure deficiencies are noted during the inspections and that those deficiencies are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet. Refer to reference (b) for inspection sheets and guidelines.

Hazardous Waste Accumulation Area-Inspection Checklist

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

Inspection Items	Yes	No	Comments
Administrative			
1. Are HW personnel training records current?			
2. Is the HW Operation Manual and HW operations consistent and up to date?			
3. Are Daily, Weekly and Quarterly inspections completed and corrective action taken as needed?			
4. Are HW collection and turn-in document on file for three years?			
5. Is the inventory for HW destined for off-site disposal and recycling; on site recycling/treatment; and available for reuse current and up to date?			
6. Are HW manifest/Receipts/TSDF signed manifests or bill loadings on file? Have Exception Reports been sent to DTSC if needed?			
Safety & Spills Prevention and Control			
7. Is the alarm system functional?			
8. Are compatible fire extinguishers available and maintained in a serviceable condition?			
9. Is PPE on-hand and in a serviceable condition?			
10. Are eyewash stations on hand and Serviceable?			
11. Are there appropriate and adequate spill kit located nearby?			
12. Are all incidental releases that occurred during filling operations promptly and properly cleaned up?			
13. Is the area free of spills or leaks?			
Containment Areas			
14. Is the area free of debris and other Materials?			
15. Are temporary containments, impermeable liners, and berms within the HWAA serviceable? Is the containment capacity 10 percent of total or 110 percent of the largest container?			
16. Are secondary containments free of standing liquids, excess dirt and debris?			
17. Are drums and containers not leaking, damaged, misused, or missing from the HWAA?			
18. Is all liquid HW containers stored in a secondary containment?			

Inspection Items	Yes	No	Comments
Administrative			
19. Are all solid HW that do not have primary containment (ammo boxes, fuel, bladders, etc.) stored in an authorized container?			
20. Are containers compatible with the waste streams?			
21. Are containers in good condition (free of dents and corrosion, not bulging, or otherwise deteriorating)?			
22. Are container tops free of spillage?			
23. Are containers properly closed?			
24. Are markings and labels on all containers and bulk storage areas present, legible, and appropriately completed and have the Words hazardous waste?			
25. Is the Initial Date of Accumulation (IDOA) marked on each HW container and bulk Storage units?			
26. Is Accumulation Start Date (ASD) shown on All containers and bulk storage units?			
27. Are all HW containers destined for disposal stored for less than 90 days Since ASD?			
28. Is there any HW destined for off-site recycling or for in-house recyclable/treated exceeding 1-year from the ASD?			
29. Are empty containers marked with the date they became empty, the word "empty" and the last known contents?			
30. Are all containers stored in a manner to Prevent leakage?			
31. Are lead acid batteries caps and posts taped and stored in a manner to prevent Leakage?			
32. Are incompatible waste stored separately?			
33. Have unknown HW or suspected PCB electrical components been sampled for Analysis?			
34. Are electrical components been marked with the wording PCB or Non-PCB according to Analytical results? Is the PCB Concentration marked on the PCB item?			
Waste Tanks (Bulk Storage)			
35. For bulk waste ASTs, are hoses, couplings, vent caps and fill caps free of leaks, Cracks, or breaks?			
36. Is the annular space-monitoring device on Bulk waste ASTs reading non-detect?			
37. Are waste ASTs free of corrosion or Release of any waste?			
38. Does the waste AST appear to be operating According to design?			

Inspection Items	Yes	No	Comments
Administrative			
39. Is there any indication of erosion or release of the primary and secondary Containment?			
40. Is the content of waste marked on the AST?			
41. Is the Accumulation Start Date on the Waste AST?			
42. Have the waste in the AST been disposed of within the allowable accumulation time?			
43. Is the waste AST compatible with its Contents?			

Additional Comments:

Corrective Action Taken:

Unit Inspector:

Name: _____
Signature: _____