

MAGTFTC-MCAGCC 29 Palms Environmental Standard Operating Procedure



1 October 2025

Hazardous Waste Satellite Accumulation Area (SAA)

Application and Purpose

This guidance applies to personnel who are involved with hazardous waste (HW) Satellite Accumulation Area (SAA) practice aboard Marine Air Ground Task Force Training Command (MAGTFTC), Marine Corps Air Ground Combat Center (MCAGCC) Twentynine Palms ("installation").

This document provides environmental protection guidelines for SAA management.

Procedures

SAA is a site for temporary HW accumulation at or near the point of generation. A SAA consists of a designated portable or permanent secondary containment area 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 the Hazardous Waste Management Branch (HWMB) must work together to confirm that SAA regulatory requirements are met.

Units aboard the installation accumulate HW and temporarily store them in a SAA location. Individual units are responsible for overall site cleanliness and for confirming that HW is placed in the correct containers.

Operational Controls

The following controls apply:

- Used battery management:
 - Lead acid battery:
 - Apply duct tape to battery terminals to prevent arcing.
 - Load batteries onto a wooden pallet one layer high.
 - Transport used batteries to HWMB, building 2095, for disposal (five or fewer batteries will be picked up by HWMB).
 - Lithium battery:
 - Apply duct tape to battery terminals to prevent arcing.
 - Do not expose batteries to water or moisture.
 - o If batteries are smoking or on fire, contact the fire department.
 - o If batteries are damaged, contact HWMB via phone at (760) 830-7244.

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Training Requirements

All affected personnel must be trained in this document and the following:

General Environmental Awareness training

Recordkeeping

The following records must be maintained for this document:

- Safety data sheets for all stored HW
- > Enclosed weekly inspection checklist, maintained for at least 3 years

Emergency Preparedness and Response Procedures.

Refer to the Integrated Contingency and Operations Plan and spill response procedures listed in the Abatement ESOP.

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. If this ESOP contains an enclosed inspection checklist, designated personnel will conduct the inspections using this ESOP as guidance and document the inspections via the enclosed checklist. If deficiencies are discovered during an inspection, the ECC will ensure immediate corrective action is taken and that all deficiencies and corrective actions are recorded on the enclosed checklist.

References

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

ESOPs are used to augment instructions contained in official orders and directives, and, where necessary, provide for sufficient control of the installation's significant practices. Environmental Affairs maintains the authoritative, current version of this and other ESOPs on the installation's website: https://www.29palms.marines.mil/Staff-Offices/G-4-Installation-Support-Directorate/Environmental-Affairs/#environmental-sops



Hazardous Waste Satellite Accumulation Area

ECC/Unit Inspection Checklist

| Date: | Unit: |
|----------------|------------|
| Unit Rep Name: | Signature: |
| Locations: | |

| | Inspection Items | Yes | No | Comments |
|-----|------------------------------------------------------------------------------|-----|----|----------|
| 1. | Have personnel received the appropriate level of training (General | | | |
| | Environmental Awareness and this ESOP)? | | | |
| 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 any drums or containers leaking, damaged, misused, or missing from the | | | |
| | SAA? | | | |
| 7. | Are wastes in their proper compatible containers and not mixed? | | | |
| 8. | Are lead acid batteries marked, and terminals taped? | | | |
| 9. | Are damaged lead acid batteries with missing caps, leaks, or cracks packaged | | | |
| | in open-top polyethylene drums for pickup by Hazardous Waste | | | |
| | Management Branch? | | | |
| 10. | Are empty containers marked with the word "Empty" the date they became | | | |
| | empty, and the last known contents? | | | |
| 11. | Are secondary containments and SAA free of standing fluids, excess dirt, and | | | |
| | debris? | | | |
| 12. | Is the drain on the secondary containment closed? | | | |
| 13. | Are HWs placed within the SAA? | | | |
| 14. | Are transfer containers properly managed in accordance with the Vehicle | | | |
| | and Equipment ESOP? | | | |
| 15. | Are training and inspection records maintained and available for inspection? | | | |

Additional Comments:

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| Corrective Action Taken: | | | | | | |
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