Environmental Standard Operating Procedure

Hazardous Material Management/Storage

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PURPOSE.

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for the proper management and disposal of Hazardous Materials (HM). These requirements are established by Marine Corps Logistics Base (MCLB) Barstow, to reduce environmental liability of and comply with environmental permits held by and regulations required of Marine Corps Installations. This guidance applies to individuals that handle hazardous materials aboard Marine Corps Logistics Base (MCLB) Barstow and MDMC Yermo.

PROCEDURES.

The storage and handling of hazardous materials (HM) must be properly managed to ensure that uncontrolled releases of HM does not occur. Uncontrolled releases of HM could result in serious danger to human health and the environment as well as the unnecessary creation of hazardous waste.

The following procedures apply:

1. Authorized Use List (AUL): An AUL is an approved list of HM needed to meet the operational requirements of a command, facility, or work center. An effective AUL process supports the reduction of on-hand HM inventory levels, efficient tracking and visibility of HM inventory, "cradle-to-grave" management, reduces the amount of HM that becomes a Hazardous Waste (HW), and promotes the use of Environmentally Sustainable Products (ESP). Each department/work center within an organization that utilizes HM is required to maintain an AUL. All department/work center AULs will be created by the Environmental Division. Only products approved on the individual department/ work center's AUL may be purchased, stored, or used by that department/work center. The department/work center ECC will review the AUL periodically to ensure accuracy based on mission essential processes and procedures. The Environmental Division will continuously monitor and review the AUL for ESP substitutions. As ESP are identified, products replaced by ESP will no longer be authorized for use unless organizations provide documentation requiring non-ESP material to the Environmental Division.

2. Receipt of HM by End-Users: Full manufacturer shelf-life will be granted when initial hazmat labels are created for HM at the Base Supply. Upon receipt, the work center or end-user assumes responsibility for "cradle-to-grave" management of the HM. The work center or end-user will ensure that the HM meets the following criteria:

a. The HM packaging is clearly labeled by the manufacturer and is free of any defects to include leaks, dents, and rust.

b. The HM is identified with a hazmat label to include the following information:

1. Material/Trade Name
2. Manufacturer
3. National Stock Number (NSN)/Local Stock Number (LSN)
4. Safety Data Sheet (SDS) Number
5. Expiration (Exp.) Date
6. Lot/Batch Number
7. Serial Number

c. The HM has a minimum of 85 percent shelf-life remaining unless currently being used or is planned for immediate use or consumption.

3. **HM without hazmat Labels**: If HM is received by the work center or end-user without hazmat labels, it is the work center or end-user's responsibility to contact their department's Environmental Compliance Coordinator (ECC) to complete the MCLB Environmental Department Hazardous Material Label Request Form and submit the completed request form to the HM program manager. It is the end-user's responsibility to ensure that the hazmat labels are correctly adhered to each HM container regardless of the unit of issue. If you have any questions regarding the hazardous material labeling processes, procedures, or requirements, contact the HM program manager.

a. Each HM container will have a hazmat label unless it meets the conditions presented in 3b.

b. A hazmat label is not required to be adhered to the HM if it is not feasible to apply (e.g., to small containers) without covering any of the directions, product identification (e.g., NSN, Part Number, Manufacturer, Material Name, Unit of Measure, manufacture (MFG.) Date, Exp. Date, and Re-inspect/Test Date) or warning labels. These materials are exempt from hazmat label identification.

4. **Storage**: Proper management of HM while in storage will increase safety and material quality while decreasing disposal of unopened or unused HM due to shelf-life expiration. The storage and handling of HM must be properly managed to ensure that an uncontrolled release of HM does not occur. Uncontrolled releases of HM could result in serious danger to human health and the environment, as well as the unnecessary creation of hazardous waste

a. HM that does not have adequate shelf-life should be evaluated by suppliers and be extended prior to issue. Proper stock rotation is required to ensure materials with the

shortest shelf-life are issued first, this practice is commonly known as "First In, First Out" (FIFO). To prevent uncontrolled releases, HM must be stored in a manner that will prevent inadvertent contact and or mixing of incompatible materials. HM must be segregated and stored in authorized containers or storage lockers that are properly marked and labeled with the HM that is being stored. Units are responsible for the safe handling and storage of all HM being used, to include the procurement of appropriate HM storage lockers.

b. End-users will ensure:

1. Ensure Safety Data Sheets (SDS) are readily available and current for all HM used or stored within the unit.

2. All personnel are equipped with the proper PPE

3. All manufacturer recommendations for storage are followed to include temperature, environment, and packaging.

4. Materials are in a controlled location with access limited to authorized personnel only.

5. Materials are properly segregated to ensure hazardous storage compatibility.

6. Eye wash stations are easily accessible and are inspected weekly.

7. Appropriate fire extinguishers available for the material on hand.

8. Proper stock rotation is required to ensure materials with the shortest service-life are utilized first, practicing FIFO.

9. Store HM in approved containers and or storage lockers that are authorized for use aboard the installation.

10. Identify and label each HM locker with the hazardous properties of its contents (i.e. flammable, poison, corrosive, reactive, etc.).

11. Label HM containers with the common name (i.e. Windex, CLP, bleach etc.)

12. Maintain adequate aisle space (36") between bulk storage containers to facilitate ease of access and movement.

13. Store HM in properly labeled and compatible containers or Aboveground Storage Tanks.

14. Store all flammable material (i.e. petroleum, oil and lubricants (POL), paints, etc.) in a flammable material storage locker or approve

5. **Shelf-Life Inspection**: Inspections will be conducted to ensure HM stored aboard MCLB Barstow/Yermo have adequate shelf-life and containers are in good condition.

    a. During quarterly Environmental Compliance Evaluation (ECE) site visits, shelf-life will be spot-checked to ensure all HM has adequate shelf/service-life remaining. Materials reaching their specified shelf/service-life may receive a shelf-life extension (if available) or shall be prepared for turn-in. Contact the Environmental Hazardous Waste Program Manager to schedule the turn-in.

    b. It is the end-user's responsibility to ensure quarterly shelf/service-life inspections are performed.

    c. Units/tenants will identify all HM scheduled for weekly turn-in to the HW 90-Day Facility. HM will be consolidated to one pick-up location prior to their scheduled HM appointment.

    d. Units shall not pre-mark excess or spent materials as "Waste", "Hazardous Waste", "Bad/Used".

    e. Materials will be properly containerized to ensure compatibility and properly identified. Incompatible HM will not be co-located on the same pallet.

    f. It is the unit's responsibility to transport the material to the HW 90-Day Facility or to schedule a pickup with the HW program manager. The unit will ensure that sufficient manpower and material handling equipment is available at the time of pick-up to assist with the loading of materials. Environmental personnel conducting the pick-up will not be responsible for loading the materials and will only ensure proper loading and segregation.

    g. Upon arrival, environmental and properly trained personnel will conduct physical inspection of HM and identify any discrepancies. It is the unit's responsibility to correct identified discrepancies prior to loading. Environmental staff will evaluate all material and make all HW determinations once the material has reached the HW 90-Day Facility.

    h. Aerosol Spray Cans: nozzles.

        1. Units will NOT remove metal or plastic covers or spray nozzles.

2. Aerosol cans can be turned in as a single item on the HM/HW Turn-In Document Form.

i. Adhesives and Sealing Compounds: Adhesives and sealing compounds, regardless of type, can be turned in as a single line item on the HM/HW Turn-In Document. Special notice should be given to separate those adhesives and sealing compounds that are noted as CORROSIVE.

j. Paint (Full, Partially Full, or Empty):

1. Paints, regardless of type, can be turned in as a single line item on the HM/HW Turn-In Document, Form.

2. Paints will not be poured or mixed with other paints prior to turn-in.

k. Petroleum, Oils and Lubricants (POLs) Rags and Matting: Place in containers marked with the appropriate noun name "POL Used Rags & Matting".

l. Solvent Rags:

1. Solvent-contaminated disposable wipes must be accumulated, stored, and transported in non-leaking, closed containers that are labeled "Excluded Solvent-Contaminated Wipes" per 40 CFR 261.4(b)(18).

2. Each container will include the start date of accumulation (i.e., the date the first solvent-contaminated wipe is placed in the container) in order to provide documentation of the 180-day accumulation time limit per 40 CF 261(b)(18)(v).

m. Soil or Dry Sweep:

1. Soil or dry sweep contaminated with POLs will be collected in proper containers and staged for turn-in to HW facility.

2. Soil or dry sweep contaminated with solvents or other hazardous non-petroleum-based products will be stored in a separate container than soil or dry sweep contaminated with POLs.

n. Fluorescent Lamps or Bulbs:

1. Spent or expired lamps will be turned in to the HW Facility.

2. Every effort will be made to use the original container.

3. Broken lamps will be properly containerized (e.g., boxed and labeled "broken bulbs") and turned in to the HW facility.

o. Mercury and Mercury-Containing Equipment:

1. Mercury-containing equipment (i.e., thermostats, levels, medical equipment or items) will be turned in to the HW facility as one complete unit.

2. Due to the risk of mercury exposure, no attempt should be made to separate the mercury or mercury-containing devices from any equipment or housing.

p. Fire Extinguishers:

1. Contact the HW 90-Day Facility at 760-577-7442 to schedule an appointment to properly DEMIL all excess extinguishers.

q. Oil and Fuel Filters:

1. To reduce the potential for leakage, a compatible container with a secured lid will be utilized to consolidate and transport the oil and fuel filters for weekly turn-in to the HW facility.

2. Containers will be marked with the words "Used Oil Filters" or "Use Fuel Filters" respectively.

r. Lead, Silver or Tin Solder:

1. All residues or pieces of lead, silver or tin solder will be captured and turned in to the HW facility.

2. All lead items or scrap (lead wheel weights, marine sacrificial anodes, damaged battery cable ends and non-munitions scrap items) will be collected and turned in to the HW facility. The items are inherently recyclable and cannot be removed from the installation. The HW section will provide a proper DOT container upon request. Mark the container "Lead Items for Recycling".

s. Compressed Gas Cylinders:

1. Empty Containers: All empty containers will be turned into base recycling for solid waste diversion.

2. All owned, leased, or contract serviced closed loop compressed gas cylinders will be returned to the contract holder and will not be returned to DLA as excess.

3. All compressed gas cylinder will be handled as follows:

    a) All gas cylinder without a clear label, a damaged shell, or incomplete accessories must be returned to the vendor.

    b) All compressed gas cylinders must have a proper label attached. It must be clear and easy to find. This is very important to prevent misuse of certain gases.

    c) Inspect the shell to ensure it is in good condition and free of corrosion.

    d) Inspect the accessories such as regulator pressure control, valve, pressure gauge, valve, and safety cap complete and in good conditions.

    e) Cylinder must be stored in an upright position.

    f) Safety caps are installed and secured when it is not in use.

    g) Store in proper area, free from ignition sources, heat sources, and good ventilation.

    h) Store securely. Cylinders must be secured by lower and upper chains to prevent it from falling.

4. Separate empty and full cylinders.

5. Contact the HW 90-Day Facility for proper turn-in procedures for all government owned compressed gas cylinders.

t. Household Hazardous Materials:

1. Active-duty personnel and their dependents residing within Base housing units may deliver home or garage products to the HW 90-Day Facility, Bldg. 632.

2. Acceptable items include household cleaners, solvents/thinners, furniture strippers, wood preservatives, automotive fluids, paints, polishes, and lighter fluids.

3. Except for used oil, off spec fuel and used antifreeze, products must be in the original containers and must display all labels and warnings. Used oil, off spec fuel, and used antifreeze must be containerized and identified appropriately. Products are available for use/redistribution to all personnel.

6. **Identification of any Unknown Material**: Because of the severe civil and criminal implications of improper management of HM, the highest level of command attention must be given to ensure unknown materials are not stored aboard MCLB Barstow/Yermo. If a material cannot be immediately and properly identified, call Fire and Emergency Services Division (FESD) at 760*577*6666/911.

7. **Spill Reporting and Response Requirements**:

   a. Guidelines for spill reporting/handling can be found in the Spill Response ESOP.

   b. Any releases or spills that occur in and around the area of responsibility must be reported immediately to the Base Fire and Emergency Services Division (FESD) by dialing 911. A Spill Release Log must be completed and forwarded to the Environmental Compliance Supervisor via the unit Environmental Compliance Coordinator (ECC). A copy of the completed Spill Release Log must also be maintained in the units ECC Binder. Forms can be obtained from the Environmental Division Office Bldg. 196.

   c. Units must stock appropriate amounts of spill containment and control equipment onsite for use in the event of a spill.

   d. Signs are to be posted in the vicinity of the used oil, off spec fuel, used antifreeze, hazardous material, or pollution abatement facilities that will indicate the following information:

      IN CASE OF AN OIL OR HAZARDOUS MATERIALS SPILL
      CALL FIRE AND EMERGENCY SERVICES DIVISION AT 760*577*6666/911.
      NOTIFY YOUR COMMANDER/SUPERVISOR IMMEDIATELY

      The sign must have yellow background and black lettering. Information to purchase the signs can be acquired from the cognizant ECC.

REFERENCES:

a. Resource Conservation and Recovery Act (RCRA)
b. 15A NCAC 13A, Hazardous Waste Management
c. DoDM 4140.27, Volume 1, DoD Shelf-Life Management Program: Program Administration, Incorporating Change 1, August 31, 2018
d. DoDM 4140.27, Volume 2, DoD Shelf-Life Management Program: Materiel Quality Control Storage Standards, Incorporating Change 1, August 31, 2018
e. MCO 4140.5A, Marine Corps Shelf-Life Program
f. MCO 4450.12A, Storage and Handling of Hazardous Materials
g. MCO 4450.13A, Materiel Quality Storage Standards Policy for Self-Life Materiel
h. MCO 5090.2, Environmental Compliance Protection Program, Vol. 1-21
i. Integrated Contingency and Management Plan (ICMP)

TRAINING:

Unit personnel should be trained on all the provisions of this ESOP. All training must be requested through unit ECC or Environmental Compliance Branch.

Department supervisors shall ensure that personnel who perform operations such as vehicle maintenance, fueling, or washing are properly trained in the operation and maintenance of pollution abatement facilities. Personnel shall be trained on the environmental impact of oil and HM spills, and prevention of such incidents.

All affected personnel must be trained in this Standard Operating Procedure and the following:

a. OSHA 10 – Initial Hazardous Material and Hazardous Waste Training
b. HAZCOM – Hazardous Communication Training
c. Initial/Refresher Hazardous Material and Hazardous Waste Training
d. HM Transportation for Drivers

DEFINITIONS:

Authorized Material List (AML). A list of hazardous materials approved for use aboard MCIEAST - MCB CAMLEJ derived from the unit level AUL.

Authorized Use List (AUL). A list identifying all potential HM stored or used by an End-User and maximum storage quantities.

Hazmat Label. A label identifying the NSN, Material Name, Expiration/Test Date, and individualized serial number. Yellow labels are assigned to hazardous materials upon receipt. HM with blue labels are items received from the reissue facility.

End-User. The purchaser of a hazardous material with the intent of consumption.

Enterprise Application Software (EAS). The IT solution chosen by Headquarters Marine Corps (HQMC) for the management of hazardous material aboard Marine Corps installations.

Environmental Compliance Coordinator (ECC). An individual, assigned by their respective Command, that is responsible for the management and implementation of the command environmental program.

Excess Hazardous Material. Unused HM that will not be used by the end user, this type of material can be redistributed, recycled, or transferred to the HMCS for processing.

Exempt Material. HM that tis not required to be identified by an EAS label.

Expiration Date. The date that a hazardous material has been identified to no longer meet manufacturer or government specification and must be turned in for disposal.

Hazardous Material (HM). A chemical compound or combination of compounds which have been identified by DOT posing or capable of posing a significant risk to public health, safety, or the environment due to its quantity, concentration, or physical/chemical, and/or infectious properties, and/or characteristics while transported in commerce.

Household Hazardous Materials. Hazardous materials used by residential activities which could cause harm to humans or the environment if improperly managed or disposed. Household HM includes new/used household solvents, cleaning agents, paints, dyes, petroleum products, and pesticides.

Issue Point/Supply Organization. Any organization that maintains bulk property with the intent to sell and distribute, without use.

Local Stock Numbers (LSN). A 13-digit, alpha-numeric number created locally in place of a National Stock Number. LSN are assigned for products without an NSN or a unit of issue deviation.

Maximum On-Hand Quantity (MOHQ). The maximum on-hand quantity of hazardous materials an End-User is authorized to have in their possession based on their AUL. A MOHQ will be established to limit storage amounts for up to 90 days' supply.

National Stock Number (NSN). A 13 digit, numeric-only number created by the DoD for unified inventory identification.

Non-exempt Material. Material that is required to be identified by an EAS label.

Release. The uncontrolled loss of a hazardous material that reaches the environment (dirt, asphalt, floor drains), including POLs and coolants. All releases are required to be reported to the Fire and Emergency Services Division at 911. A release of POL or coolant that occurs within an enclosed and contained maintenance facility is not subject to this reporting requirement provided they do not have the potential to impact the environment.

Service Life. A general term used to quantify the average or standard life expectancy of an item while in use by the end-user after being sold/issued to the customer.

Shelf-Life. Is the total period beginning with the date of manufacture, date of cure, date of assembly or date of pack and terminated by the date by which an item must be used or subjected to inspection, test, restoration or disposal action that an item can remain in the wholesale or retail storage system and still be suitable for use by the end user.

Waste Minimization. The elimination or reduction of waste that is generated and would otherwise be subsequently treated, stored, or disposed. It includes any source reduction or recycling activity undertaken by a generator.

Work Center. An area or group of areas within a command, unit, or organization sharing the same operational requirements for HM due to similar work practices. Work centers may not be physically connected for this term to apply. Each work center will have HM required for work practices approved and listed on its AUL.