Title: Hazardous Material Transportation

1.0 PURPOSE

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for hazardous material transportation operations.

2.0 APPLICATION

This guidance applies to those individuals who perform hazardous material transportation operations aboard Marine Corps Logistics Base (MCLB) Barstow.

3.0 PROCEDURE

3.1 Discussion:

Hazardous material transportation operations require the handling of hazardous materials and hazardous waste containers, preparing them for shipping, including the placarding of vehicles and preparing shipping papers. Hazardous materials and hazardous waste prepared for transport may be categorized as flammable, corrosive, explosive, etc. and must be handled according to Department of Transportation (DOT) regulations in order to minimize impacts to human health and the environment. All hazardous materials must be stored in approved containers.

3.2 Operational Controls:

The following procedures apply to transports at MCLB Barstow:

   a. Ensure that Material Safety Data Sheets (MSDSs) for all materials associated with this practice are current and available for inspection.

   b. Ensure hazardous materials manual is available and is in a designated location.

   c. Ensure that required training and certifications are current and available for all unit personnel.

   d. Wear appropriate personal protective equipment (PPE), including eye protection, chemical–resistant clothing, gloves, and steel-toed boots as necessary.

   e. Maintain a fully stocked spill kit and fire extinguishers nearby in designated locations.
f. Store and transport all hazardous material in approved containers authorized for use intended. Check containers for deterioration and structural integrity.

g. Ensure drums and other containers are not overfilled. Containers are considered full when 3 to 4 inches of headspace remain to allow for thermal expansion.

h. Check all containers to ensure they are closed and secured before transporting, and that all hazardous materials to be shipped together are compatible.

i. Ensure the proper shipping papers, to include the Emergency Response Guidebook or the specific pages that pertain to the shipment of material, accompany all shipments. Maintain a copy including container type and material identification.

j. Conduct periodic maintenance on transport vehicles, as recommended by manufacturer or technical manual.

k. Inspect secondary containment and drainage valves to ensure they are free of leaks and in the fully closed position.

l. Document periodic inspections of storage areas and maintain inspection records for three years.

m. Properly clean up all spills, as soon as they are identified, and report the spill to the supervisor, DOT (for spills which occur during transportation) and the Environmental Department.

n. Record all spills in a spill log book detailing the spill date, time, product spilled, quantity, location, cleanup actions taken and the name of the person reporting the spill and ensure that a spill report containing this information is submitted to the Environmental Division.

The following procedures apply, in addition to those listed above, for transportation off of the installation:

a. Ensure that the proper shipping papers, to include the Emergency Response Guidebook or the specific pages that pertain to the shipment of material, accompany all shipments. The Shipper’s Certification block on the shipping papers must be signed by a qualified person who has completed the required training within the past two years for explosives and three years for all other hazardous material/waste. Maintain a copy including container type, DOT material identification number, and manifest number.

b. Ensure that the manifest contains the following information:

1. Name and Environmental Protection Agency (EPA) number of generator, the transporter, and the place where the waste is to be treated, disposed or stored.
2. DOT description of waste.
4. Address of the treatment, storage, or disposal facility.
c. Ensure that the manifest is signed each time the waste is transferred.

d. Ensure that DOT placards on a motor vehicle or rail car are clearly visible from the direction it faces, except the direction of another transport vehicle or rail car to which it is coupled.

e. If there are any specific situations or other concerns not addressed by this procedure, contact the Environmental Department.

3.3 Documentation and Record Keeping:

The following records must be maintained:

a. MSDSs for all materials associated with this practice
b. Hazard materials manual
c. Training records and certifications for personnel
d. Shipping papers
e. Scheduled maintenance log book
f. Inspection records
g. Spill log
h. Record of accident reports submitted to the CHP, San Bernardino County Sheriff’s Office, Barstow PD or the MCLB Barstow Police Department

3.4 Training:

All personnel must be trained in this ESOP, to include the following, as applicable:

a. Hazard Communication (HazCom) training
b. Preventative maintenance training
c. Applicable technical School
d. Marine Corps Order training
e. Hazardous Material Driving Safety course
f. On-the-job training

3.5 Emergency Preparedness and Response Procedures:

Refer to the Integrated Contingency Plan for MCLB Barstow.

3.6 Inspection and Corrective Action:

The Environmental Compliance Coordinator (ECC) shall perform or designate personnel to perform inspections. The ECC shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet.
4.0 REFERENCES

- 40 CFR 262 (Code of Federal Regulations)
- 29 CFR 1910
- 49 CFR 173, 178, 179
- DOD 4500.9-R (Department of Defense)
- MCO P4030.19G-.19H (Marine Corps Preparing Hazardous Materials for Military Air Shipments)
- MCO 4450.12A (Marine Corps Storage and Handling of Hazardous Materials)
- MCO P5090.2A (Marine Corps Environmental Compliance and Protection Manual)
- MCO P5100.8F (Marine Corps Occupational Safety and Health Program Manual)
- MCO P4790.2C (Marine Corps Integrated Maintenance Management System Field Procedures Manual), as necessary