

Environmental Standard Operating Procedure (Approved by Jonathan Auger)

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Title: HW Satellite Accumulation Area PGP

1.0 PURPOSE

The purpose of this Standard Operating Procedure (SOP) is to provide environmental guidelines for the management of HW Satellite Accumulation Area (Process Generation Point).

2.0 APPLICATION

This guidance applies to those individuals working with HW Satellite Accumulation Area aboard Marine Corps Logistics Base (MCLB) Barstow.

3.0 PROCEDURE

3.1 Discussion:

Units aboard MCLB Barstow accumulate hazardous waste at HW Satellite Accumulation Area. HW Satellite Accumulation Area is at or near the process, or point of generation, of hazardous waste. The MCLB Barstow Environmental Division will designate a these site locations at the request of a Division, Branch, or Unit. For information on requesting and establishing a HW Satellite Accumulation Area contact the Environmental Division.

3.2 Operational Controls:

In general, the Environmental Division and the individual unit requiring the HW Satellite Accumulation Area have dual operational control and responsibility of a site. The basic duties of each are as follows:

MCLB Barstow Environmental Division shall:

- a. Initially provide secondary containment and properly marked storage containers for each waste stream for the satellite site.
- b. When feasible provide pick-up service to the site at a minimum of every 72-hours for containers smaller than 85-gallons and every 45-days for storage tanks.
- c. Train unit operators on proper placement of hazardous waste into the containers.
- d. Perform quarterly or as needed inspections.

Unit shall:

- a. Ensure all operators receive proper training from the Environmental Division on placement of hazardous waste in the containers.
- b. Each organization shall replace hazardous waste containers to the site if removed or when requesting additional waste streams.
- c. Ensure spill kits are established near the satellite site and replenish spill kits as necessary.
- d. Place all hazardous waste in designated containers.
- e. Do not move or remove containers from the satellite site.
- f. Ensure that top, sides, and area around hazardous waste containers are free of any liquid, spilled material, or debris.
- g. Notify the Environmental Division if containers become full prior to the 72-hour service.
- h. Provide spill kits, extinguishers, and “No Smoking” signs for the satellite site.
- i. Mark empty containers with the word “Empty”, its last content held and date it became empty.
- j. Ensure transfer containers are marked for specific waste streams and remain covered when not in use.
- k. Lead acid batteries must have caps and posts taped and marked with an out of service date.
- l. Ensure that soils, floor sweep, and contaminated debris (sandbags, wood, etc) contaminated with a petroleum product are taken to and turned in to the HW Satellite Accumulation Area.
- m. Contact the Environmental Division if additional drums are needed for increased or changed waste streams.

3.3 Documentation and Record Keeping:

Refer to the Integrated Contingency Management Plan (ICMP) for documentation and record keeping requirements.

3.4 Training:

All affected personnel must be trained in the Standard Operating Procedure for placement of hazardous waste into the satellite site and the following:

- a. ESOP for HW Satellite Accumulation Area.
- b. Online courses provided by Environmental Learning Management System (ELMS).
- c. Hazard Communication training (HAZCOM).
- d. General Environmental Awareness training.

3.5 Emergency Preparedness and Response Procedures:

Refer to the Integrated Contingency Management Plan for MCLB Barstow.

3.6 Inspection and Corrective Action:

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

a. Site operational inspections shall be conducted upon arrival at the satellite site and prior to servicing by Environmental Division personnel.

Weekly compliance inspections to include Drums shall be performed by the unit designated personnel. The weekly inspection sheet to include discrepancies shall be maintained in the HW Satellite Accumulation Area folder.

4.0 REFERENCES

- 40 CFR
- Title 22, California Code of Regulations
- MCO P5090.2A
- Integrated Contingency Management Plan (ICMP) for MCLB Barstow

HW Satellite Accumulation Area Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are weekly inspections on file for the past 3 years? (40 CFR 265.174)			
2. Are secondary containments free of excess dirt and debris? (40 CFR 265.195(a)(4))			
3. Are no Smoking signs posted? (40 CFR 265.17(a)(3))			
4. Are compatible fire extinguishers available and maintained in a serviceable condition? (40 CFR 265.32(c))			
5. Is PPE on-hand and in a serviceable condition? (29 CFR 1910.120(q)(11)(ii), 29 CFR 1926.65(q)(11)(ii))			
6. Are drums and containers not leaking, damaged, misused, or missing? (40 CFR 265.173(b), 40 CFR 262.34(a))			
7. Are markings and labels on all containers present, legible, and appropriately completed? (40 CFR 265.34(a)(3))			
8. Are wastes in their proper containers and not mixed? (40 CFR 265.177(a))			
9. Are containers closed and wrenched tight? (40 CFR 265.173(a), 20 CFR 262.34(a))			
10. Are empty containers marked with the date they became empty, the word "empty" and the last known contents?			
11. Are all containers stored in a manner to prevent leakage? (40 CFR 262.34(c)(1)(i), 40 CFR 265.172, 40 CFR 265.173(a))			
12. Is a copy of the units spill contingency plan readily available?			
13. Are training and inspection records maintained and available for inspection? (MCO P5090.2A 9104.1(a)(1) – inspection only)			
14. Is there an adequate spill kit nearby?			
15. Are containers compatible with the waste and in good condition? (40 CFR 265.177(a))			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:
