

## Environmental Standard Operating Procedure (Approved by Jonathan Auger)

Document Owner: Environmental Division

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### **Title: Hazardous Waste Storage Less than 90 Day Site**

#### **1.0 PURPOSE**

The purpose of this Standard Operating Procedure is to provide environmental guidelines for the management of Hazardous Waste Storage Less than 90-Day Site.

#### **2.0 APPLICATION**

This guidance applies to those individuals working in the Hazardous Waste Storage Less than 90-Day Site aboard Marine Corps Logistics Base (MCLB) Barstow.

#### **3.0 PROCEDURE**

##### **3.1 Discussion:**

The Hazardous Waste (HW) Storage Less Than 90-Day Site is operated by the MCLB Barstow Environmental Division, Hazardous Materials/Hazardous Waste Management Section. The HW Less Than 90-Day Site is responsible for receiving Hazardous Waste (HW) from organizations at MCLB Barstow, interim storage of HW, and off-base shipment and disposal of HW. The Hazardous Waste Coordinator prepares and promulgates HW accumulation, handling, and turn in procedures for MCLB Barstow. HW Less Than 90-Day Site manages interim storage and preparation of HW for off-site disposal in accordance with all applicable HW regulations including proper containerization, labeling, documentation, and adherence to the 90-day HW storage limit. Reference the Integrated Contingency Management Plan for MCLB Barstow for information regarding the HW Less Than 90-Day Storage.

##### **3.2 Operational Controls:**

Refer to the Integrated Contingency Management Plan (ICMP) Volume 1N and 1Y for MCLB Barstow.

##### **3.3 Documentation and Record Keeping:**

Refer to the Integrated Contingency Management Plan Volume 1N and 1Y for MCLB Barstow documentation and record keeping requirements.

- a. Inspection and training records.

##### **3.4 Training:**

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

- a. SOPs for Hazardous Waste Operations.
- b. Hazard Communication training.
- c. 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Course.
- d. General Environmental Awareness training.

### **3.5 Emergency Preparedness and Response Procedures:**

Refer to the Integrated Contingency Management Plan (ICMP) Volume 2 for MCLB Barstow.

### **3.6 Inspection and Corrective Action:**

Daily (visual), weekly and quarterly (logged) inspections are required at the HW Less Than 90-Day Site. The HW Manager or designee shall have the overall responsibility to ensure that weekly and quarterly inspection requirements are met. The HW Manager shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet. The Environmental Division Compliance Branch shall conduct quarterly inspections.

## **4.0 REFERENCES**

- 40 CFR
- 29 CFR
- MCO P5090.2A
- Integrated Contingency Management Plan (ICMP) for MCLB Barstow

<b>Hazardous Waste Storage Less Than 90 Day Site Inspection Checklist</b>	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are HW/personnel training records current? (40 CFR 265.16)			
2. Are weekly and monthly inspections on file for the past 3 years? (40 CFR 265.174)			
3. Are all completed Waste Information Documents on file?			
4. Are waste manifest/Receipts/TSDf signed manifests on file for the past 3 years? (40 CFR 262.40(a))			
5. Are biennial and exception reports sent to DTSC? (40 CFR 262.41(a) and (b))			
6. Are ignitable wastes within 50' of the property line? (40 CFR 265.176, 40 CFR 262.34(a))			
7. Are required signs posted? (40 CFR 265.14(c))			
8. Are no Smoking signs posted? (40 CFR 265.17(a)(3))			
9. Is the alarm system functional? (29 CFR 1910.120(j)(5)(iii), (l)(3)(vi), (p)(8)(iv)(E), 40 CFR 265.32(a))			
10. Are compatible fire extinguishers available and maintained in a serviceable condition? (40 CFR 265.32(c))			
11. Is PPE on-hand and in a serviceable condition? (29 CFR 1910.120(q)(11)(ii), 29 CFR 1926.65(q)(11)(ii))			
12. Are eyewash stations on hand and serviceable?			
13. Are drums and containers not leaking, damaged, misused, or missing from the HWAA? (40 CFR 265.173(b), 40 CFR 262.34(a))			
14. Are markings and labels on all containers present, legible, and appropriately completed? (40 CFR 265.34(a)(3))			
15. Are wastes in their proper containers and not mixed? (40 CFR 265.177(a))			
16. Are containers closed and wrenched tight? (40 CFR 265.173(a), 20 CFR 262.34(a))			
17. Is the Initial Date of Accumulation (IDOA) marked on each drum? (40 CFR 262.34(a)(2))			
18. Are empty containers marked with the date they became empty, the word "empty" and the last known contents?			

Inspection Items	Yes	No	Comments
19. Are all containers stored in a manner to prevent leakage? <i>(40 CFR 262.34(c)(1)(i), 40 CFR 265.172, 40 CFR 265.173(a))</i>			
20. Are training and inspection records maintained and available for inspection? <i>(MCO P5090.2A 9104.1(a)(1) – inspection only)</i>			
21. Is there an adequate spill kit nearby?			
22. Are containers compatible with the waste and in good condition? <i>(40 CFR 265.177(a))</i>			

**ADDITIONAL COMMENTS:**

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**CORRECTIVE ACTION TAKEN:**

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**Hazardous Waste Manager**

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_