Environmental Standard Operating Procedure			
Originating Office: **MCAS Miramar Environmental Management Department**	Revision: Original	Prepared By: Environmental Management Department	Approved By: William Moog
File Name: HSS-ESOP	Effective Date: 16 Apr 2007	Document Owner: Kevin McGuinness	

Title: Hazardous Waste Storage Area (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 Areas (Less than 90 Day Sites).

2.0 APPLICATION

This guidance applies to those individuals working with Hazardous Waste Storage Areas (Less than 90 Day Sites) onboard MCAS Miramar.

3.0 REFERENCES

- 40 CFR 264.34 (c): Waste accumulation limits.
  - 40 CFR 265.171: Container condition.
  - 40 CFR 265. 172: Waste and container compatibility.
  - 40 CFR 265. 173 (a) Container management.
  - 22 CCR 666262.34 (c): Waste accumulation limits.
  - 22 CCR 66265.171: Container condition
  - 22 CCR 66265.172: Waste and container compatibility.
  - 22 CCR 66265.173 (a): Container management.
  - MCAS Miramar Hazardous Waste Management Plan.

4.0 PROCEDURE

4.1 Discussion:
The Hazardous Waste Accumulation Site (HWAS) is operated by each tenant Command aboard MCAS Miramar which in turn designates a Hazardous Waste Coordinator (HWC) to manage the site. The HWC is responsible for receiving Hazardous Waste (HW) from the different shops within the Unit. The Hazardous Waste Coordinator will be responsible for the HWAS and collection containers, in accordance with all applicable HW regulations including proper containerization, labeling, documentation, and adherence to the 60-day HW storage limit. The MCAS Miramar Hazardous Waste Management Plan must be use as a reference when question arise on how to manage the WAS and how to handle HW, also DOD 4145.11 (Storage and Handling of Hazardous Materials) may be revise. For more information at any time the

Coordinator may contact the Environmental Management Department S-7 at 858-577-1108.

4.2 Operational Controls:

For operational control and procedures, refer to MCAS Miramar Hazardous Waste Management Plan; another source will be the Resource Conservation and Recovery Act (RCRA) that cover many of the concerns about the dangers of improper storage of Hazardous Waste.

4.2 Documentation and Record Keeping:

Refer to MCAS Miramar Hazardous Waste Management Plan, (section 6); this records need to be easily accessible for reports and Audits, also this records need to be retained for a minimum of three years. In some cases they may have significant legal and public interest aspects. The Environmental Management Department (EMD) will also advice MCAS Miramar tenant Command of the documentation and record keeping requirements. As per DoD and Marine Corps Orders.

4.4 Training:

All affected personnel must be trained in this Standard Operating Procedure and the training plan found in the Hazardous Waste Management Plan (HWMP). For more information refer to 40 CFR 262.34(a) (4) and 22 CCR 66265.16. Training must be done within six months after assignment to as a Hazardous Waste Coordinator, all personnel are required to take MCAS Miramar 24 Hour Hazardous Waste Coordinator Course, follow by a 8 Hour Refresher Class every year after the 24 HR Course. All records of training must be kept at the unit in which the employee works and a copy of all training are to be submitted to the Environmental Management Department (EMD).

4.5 Emergency Preparedness and Response Procedures:

All personnel are to be trained by HW Coordinator in the proper implementation of the Emergency Response Plan .Refer to 29 CFR 1910.178; MCAS Miramar HWMP Sect.25; MCAS Miramar Oil and Hazardous Substances Spill Contingency Plan.

4.6 Inspection and Corrective Action:

Weekly inspections of the Hazardous Waste Accumulation Site (HWAS) must be conducted by the HW Coordinator (Primary or Alternate) all areas listed on the Hazardous Waste Accumulation Area Inspection Checklist Form need to be completed by the person doing the inspection, remarks and corrective actions also need to be logged and dated when any discrepancies are found and corrected. All tenant commands equipped with Use Oil Accumulation Tanks must inspect the Tank each work day using the Daily Above-Ground Storage Tank Inspection Checklist. This Weekly and Daily Inspection Forms are legal records and must be retained for three years.

Hazardous Waste Storage Area (Less Than 90 Days Site) - Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspectors Name:	Signature:

Checklist	**Yes/No**	**Remarks/Corrective Action**

1. Are the containers in good condition? Check for severe rusting, defects and/or leaks. *[CCR 66265.171]*		
2. Are the containers kept closed except when waste is being added or removed? *[CCR 66265.173(a)]*		
3. Are the containers compatible with the waste? Check containers for deterioration and structural integrity. *[CCR 66265.172]*		
4. Are incompatible waste segregated into separate containers? *[CCR 66265.177(a)]*		
5. Are the containers handled or stored in a manner to prevent a rupture or leak? Verify that the containers are not exposed to the environment and/or heavy traffic areas. *[CCR*		
6. Are containers and containment areas kept clean and free of spill residue? Ensure containers and containment areas are cleaned of any spill residue. *[CCR 66265.31]*		
7. Are the containers labeled according to the waste protocol sheet per waste stream? Ensure the correct HW labels are being used for each waste stream generated. *[HWMP Appendix A]*		
8. Are the container labels completely filled in and legible? Ensure the applicable sections of the HW labels are filled in and readable. *[HWMP Appendix A]*		
9. Is the initial accumulation start date (ASD) of the waste clearly marked and visible on each container and less than 60 days? *[CCR 66262.34(f)(1); HWMP Sec: 3.2.2]*		
10. Is the "Container Fill Date" clearly marked and visible on each container of waste that was generated at a "Satellite Accumulation Area" (SAA)? *[CCR 66262.34(f)(2)]*		
11. Is the aisle/access adequate? Verify that there is adequate aisle space between containers to allow for spill clean up or inspection of the containers. [*CCR 66265.35]*		
12. Is a fire extinguisher available and inspected monthly? Verify that the fire extinguisher's inspection record is up to date and that the proper fire extinguisher is available for the waste being stored at the site. *[CCR 66265.32(c)]*		
13. Is an eyewash system located near the site and is it working properly? Verify that plumbed eyewash station is checked and flushed weekly for a minimum of three minutes. Portable eye wash stations shall be drained and flushed quarterly, or per manufacturers directions if an antibacterial agent is used. (Flush & Refill) *[29 CFR 1910.151(c); MCO 5100.8F 13007(10)]*		
14. Is a spill kit available and adequately stocked and is a copy of Part II and IV of the Business Plan inside the spill kit? Ensure spill kit is near the waste site and contains the site-specific spill equipment required to clean up mishaps. [HWMP Sec: 4]		
15. Are secondary containment and drainage valves leak tight and kept closed? Ensure drain valves are in working condition and closed. [5090.2A, 9104, h (2) (h); SWMP BMP 14]		
16. Are spills, weeds and debris cleaned and/or removed from the site? Maintain good housekeeping. [SWMP BMP#3]		
17. Are empty containers, greater than 5-gallons that previously held HW or HM marked with the word "EMPTY" and the date it was emptied? [CCR 66261.7(f)]		

Daily Above-Ground Storage Tank Inspection Checklist	
Date:	Time:
Installation:	Work Center:

Inspectors Name:	Signature:

Checklist	MON	TUE	WED	THU	FRI	SAT	SUN	Remarks/Corrective Action
1. Is Used Oil tank clearly labeled with the words “Hazardous Waste”?*[CCR 66262.34(f)]*								
2. Is the Accumulation Start Date and pump out date clearly marked for each accumulation cycle? *[CCR 66265.34(f)(1)&(2)]*								
3. Is Used Oil accumulated for less than 90 days from the initial point of generation? *[CCR 66262.34(a)]*								
4. Is Monitoring equipment (level sensing device) in good working order? *[CCR 66265.195(a)(3)]*								
5. Is tank in good operating condition and leak free? Check tank for corrosion, cracks, dents, and leaks or releases. *[CCR 66265.195(a)(2)]*								
6. Is the tank and surrounding area free of oil residue, leaks, spills or releases? *[CCR 66265.195(a)(4)]*								
7. Is secondary containment in good operating condition and kept empty and dry, except when there is a leak or spill at which time the secondary area must be thoroughly cleaned out within 24 hours? *[DEH:HM-9271 Terms and Conditions]*								
8. Is secondary containment bypass valve normally sealed closed and the drainage of rainwater from secondary containment is inspected and performed under the supervision of a qualified person (HWC)? *[40CFR 112.8(c)(3)]*								
9. Are drainage events of secondary containment recorded? *[40CFR 112.7(e)(2)(iii)(D)]*								
10. Is the tank location identified on the Business Plan map? *[DEH:HM-9271 Terms and Conditions]*								
11. Is the tank permit posted at the worksite? *[DEH:HM-9271 Terms and Conditions]*								
12. Is the tank under the control of the operator? Ensure accumulation tank is secured and access is limited to authorized personnel. *[HWMP 3.4]*								

- Only record Saturday and Sunday if on site and using tank. Holidays need not to be recorded.
- Use this checklist only if your unit has an above ground storage tank and a AST exemption

Additional comments or observations:

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