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## STANDARD OPERATING PROCEDURE

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- Subject:** **Standard Operating Procedure Format**  
Template for the preparation of Standard Operating Procedures
- Reference:** **Best Management Practices**  
List the documents that are cited in the procedure or related to the implementation of the procedure here (use bullet list format and/or an appropriate alphabetical scheme).  
  
If there are no references, this section should say "None."
- Enclosures:** **Document Control Number (e.g. CSW-001)**  
List the Document Control Numbers in an appropriate numbering scheme.  
  
The enclosures corresponding to each Control Number are kept in the Master Enclosure File.  
  
Enclosures can include completed forms, instructions, flow diagrams, etc. that are provided with the SOP for illustrative purposes or guidance. Completed forms provided as enclosures should be representative of the actual forms, but are not required to be identical.  
  
Number enclosure pages independent of the procedure (e.g., 1 of 2), and restart the pagination for each enclosure.  
  
If no enclosures are included, this section should say "None."
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### 1. PURPOSE

The purpose of this procedure is to <describe the objective of the procedure here>

### 2. BACKGROUND

This procedure is required <provide a description of why the procedure is needed referencing regulation and/or directive here>

### 3. SCOPE

This procedure defines <provide the specific purpose definition of the procedure and who it provides guidance to here>

### 4. ACTION

This procedure applies to <provide the applicability of the procedure here>

### 5. DEFINITIONS

Provide definitions of words and key terms within the context of the procedure to ensure uniform interpretation and use (use bullet list format or an appropriate numbering scheme, and format the text as shown below).

- a) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Service Provider** – The company or entity operating HWFs and providing CSW management services to the Navy under contract N62473-10-D-4009.
- d) **Term goes here in bold**—Definition goes here in plain text.

### 6.0 RESPONSIBILITIES

Describe by job title, a list of activities the individual is responsible for performing in the procedure.

**6.1 Title 1**

Describe responsibilities (relative to implementing this SOP) for personnel functioning as <Title 1> here.

**6.2 Title 2**

Describe responsibilities (relative to implementing this SOP) for personnel functioning as <Title 2> here.

**7.0 PROCEDURE**

Provide instructions for the effective implementation of established requirements (normally includes the specification of quality records to demonstrate conformance to the requirements). Use a numbered list for steps that must be completed in a specific order; use a bullet list for steps or items that require no particular sequence. Use subheadings as needed.

**8.0 PREPARATION (REVIEW) AND APPROVAL**

- a) The Service Provider's Management will assign responsibility for the preparation of a procedure (see SOP HW-05-002). The person preparing the procedure should be intimately familiar with the details of the activities involved and should consult with others who are knowledgeable and /or actively involved with the activities. A "Prepared By" or "Reviewed By" signature block is used as below when appropriate. Revisions do not require the "Prepared By" block.
- b) The draft procedure should be reviewed by the Service Provider's CSW Manager and CSW Compliance/QC Manager. Prior to final approval, the step-by-step procedural portion should be validated by the reviewer through actual observation of the step-by-step activities. The final procedure must be approved by the CSW Manager affixing his/her signature and date to the document (use the format of text shown below).
- c) Copies should be strictly controlled. The Compliance/QC Manager maintains electronic originals in Word and PDF formats in the computer.
- d) The steps taken to implement a new procedure or revision of an existing procedure are described in HW-05-002.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Document Control of Standard Operating Procedures

**Reference:** (a) Standard Operating Procedure Format [SOP HW-05-001]

**Enclosures:** (1) CSW-001 (IWOW & CSW Training Record)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed for Service Provider management personnel providing Containerized Solid Waste (CSW) Management Services. The purpose of this procedure is to establish control of documents, including new or revised SOP's, distributed to Service Provider personnel, and to ensure that those personnel receive training upon receipt of such documents/SOPs.

## 2.0 BACKGROUND

The Service Provider provides CSW Management Services to Navy and Marine Corp installations located in San Diego County. In order to comply with Federal and State laws and regulations, Standard Operating Procedures (SOPs) have been developed to provide guidance to Service Provider personnel on the management of waste streams and operation of Hazardous Waste Facilities (HWF). These SOPs provide detailed information on how to execute the CSW mission with emphases on regulatory compliance, personnel safety, and adherence to internal Navy policies.

## 3.0 SCOPE

This procedure defines the document control process for new and revised SOPs.

## 4.0 ACTION

This procedure applies to all personnel providing CSW Services.

## 5.0 DEFINITIONS

- a) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Standard Operating Procedure** — a document that establishes standard methods and/or administrative controls for managing processes/actions.
- d) **Service Provider** – The company or entity operating HWFs and providing CSW management services to the Navy.

## 6.0 RESPONSIBILITIES

### 6.1 Preparer

- a) Prepares SOP in accordance with HW-05-001.
- b) Obtains final approval.
- c) Submits final signed SOP to CSW Compliance/QC or CSW Manager.

## 6.2 CSW Manager (CM)

- a) Validates or drafts SOP.
- b) Signs SOP for final approval.

## 6.3 CSW Compliance/QC Manager (Compliance Manager)

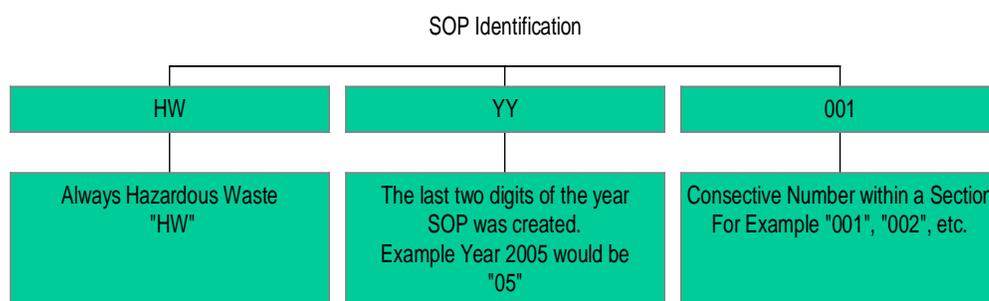
- a) Validates or drafts SOP.
- b) Signs SOP for final approval.
- c) Makes copy of original signed SOP.
- d) Scans copy of SOP into electronic record file.
- e) Makes copies for distribution.
- f) Files training documentation in master training record file.

## 6.4 Hazardous Waste Supervisor (Supervisor)

- a) Distributes SOP and provides training to HWF Personnel (HWFP) within established time frame.
- b) Files training documentation in master training file..
- c) Files original signed SOP into Master SOP files.

## 7.0 PROCEDURE

For a new or revised SOP, the following steps will be taken.



- a) The preparer of the SOP will identify the SOP with the appropriate SOP Number found in the header of each procedure. For creating a new SOP Number use the sequence HW-YY-001. See illustrated example above.
- b) The Preparer will follow the SOP format outlined in SOP No. HW-05-001.
- c) The Preparer will display a header on each page of the SOP, consisting of SOP No., Date, Date of Revision, and Page Number (e.g., Page 1 of 2).
- d) The Preparer will review the draft with the CM and Compliance/QC Manager.
- e) Upon final approval, the step-by-step procedural portion will be validated through actual observation of the step-by-step activities.
- f) After validation, the final SOP must be approved and signed by the CM and Compliance/QC Manager.
- g) After the SOP is approved, the signed copy will be submitted to the Compliance Manager.
- h) The Compliance/QC Manager will make copies of the original signed SOP for Supervisors to file in their master SOP files.

- i) The Compliance/QC Manager will scan the copy of the original signed SOP into the electronic record file.
- j) The Compliance/QC Manager will make copies of the SOP, for distribution
- k) Supervisors will distribute the SOP to HWFP and provide training and guidance on the procedures or revisions discussed in the SOP.
- l) Supervisors will file a copy of the original or revised SOP in the SOP binder located at each site. Supervisors will remove the previous SOP if it is a revised edition. The Compliance/QC Manager will verify the removal of outdated revisions during monthly site inspections.
- m) After reviewing and discussing the SOP, all HWFP will sign the CSW Training Record provided. The Supervisor will provide training documentation to the Compliance/QC Manager for filing in the personnel training files.
- n) Each Supervisor will maintain a master binder at their location with all current SOPs for reference and access by HWFP.

## **8.0 REVIEW AND APPROVAL**

The CM will assign responsibility for the preparation of a procedure. The person preparing the procedure should be intimately familiar with the details of the activities involved and should consult with others who are knowledgeable and /or actively involved with the activities.

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## STANDARD OPERATING PROCEDURE

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<b>Subject:</b>	<b>Hazardous Waste Turn-In Procedures for Forces Afloat (Local)</b>
<b>References:</b>	(a) Code of Federal Regulations, Title 40, Part 261-263 (b) California Code of Regulations, Title 22, Part §66261- §66263 (c) Code of Federal Regulations, Title 49 (d) U.S. Navy Environmental and Natural Resources Program Manual – OPNAVINST 5100.19 (Series) (e) Department of Transportation Special Permit – DOT-SP 12842 (f) 49 CFR §173.168 Chemical Oxygen Generators (g) PHMSA Interpretation Letter, Reference No. 09-0112R
<b>Enclosures:</b>	(1) CSW-002 (Weekly Pick-up Schedule, Naval Base San Diego) (2) CSW-004 (Hazardous Waste Pick-Up Scheduling Record) (3) CSW-005 (Waste Turn-In Form) (4) CSW-006 (Hazardous Waste Profile Sheet) (5) CSW-007 (Hazardous Waste Label) (6) CSW-008 (Profile Summary) (7) CSW-009 (Off-Base Hazardous Waste Label) (8) CSW-010 (Instructions for Quantofix Peroxide Test Strips) (9) CSW-011 (Contact List for Waste not Managed at CSW) (10) CSW-022 (Asbestos warning label) (11) CSW-087 (Lithium Ion Battery Warning Label)

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### 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed for Service Provider personnel providing Containerized Solid Waste (CSW) Services. It describes the process of picking up hazardous waste turned-in for disposal by ship-based activities.

### 2.0 BACKGROUND

The Service Provider operates Consolidation, Storage, and Transfer Facilities (HWF) and provides HW and HM collection and disposal services to Navy and Marine Corps Installations in the San Diego area. The Environmental Protection Agency has established regulations governing the management of HW. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90 day HWF with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM.

### 3.0 SCOPE

This procedure defines the HW turn-in procedures for forces afloat (local) and gives guidance to personnel on HW and HM acceptance and turn-in procedures.

### 4.0 ACTION

This document applies to all personnel providing CSW Services, including disposal of HW and HM in accordance with federal and state regulations.

### 5.0 DEFINITIONS

- a) **Accumulation Start Date** - date the waste was determined to be a hazardous waste and the decision was made to dispose of it.

- b) **Bio-Hazardous Waste** – any waste defined in California Health & Safety Code Division 104, part 14, section 117635.
- Laboratory waste including human or animal specimen cultures from medical or pathology labs, cultures or stock of infectious agents, waste from the production of bacteria, viruses, spores, or vaccines or devices/containers used to contain them.
  - Human tissue or specimens from surgery or autopsies suspected of being contaminated with infectious agents known to be contagious to humans.
  - Animal parts, tissues or fluids suspected of being contaminated with infectious agents known to be contagious to humans.
  - Waste which contains recognizable fluid blood or blood products or blood from animals known to be infected with diseases which are highly communicable to humans.
  - Waste containing materials contaminated with excretion, exudates' or secretions from humans or animals which require isolation to protect others from highly communicable diseases.
  - Waste which is hazardous only because it contains human specimens or tissues which have been fixed in formaldehyde or other fixatives or may contain chemotherapeutic agents including gloves, gowns, towels, empty bags or tubing.
  - Waste which is only hazardous because it is comprised of pharmaceuticals which are not hazardous as defined by the RCRA regulations.
  - Pharmaceuticals are prescription or over-the-counter drugs for use by humans or animals.
  - Drugs are any article or compound recognized within the veterinary or medical sciences to be used or intended for use to diagnose, cure, mitigate, treat or prevent disease.
- c) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- d) **CSW**- Containerized Solid Waste
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR §261.3 and Title 22 §66261.3.
- f) **Hazardous Material** – (HM) any material or substance, which even in normal use, poses a risk to health, safety, or the environment.
- g) **Label** - the shape of a diamond and it measures 3.9" on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table in §172.101, with additional information available in Subpart E of reference (c).
- h) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- i) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- j) **Unknown** – an unmarked/unlabeled material which the customer cannot identify or a material misidentified by the customer.

- k) **Waste Turn-In Form** - an accounting document used to bill activities accounts for management of their HW.

## **6.0 RESPONSIBILITIES**

### **6.1 HWF Supervisor (Supervisor)**

- a) Report to and assist the Containerized Solid Waste (CSW) Manager (CM).
- b) Be responsible for the overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in this SOP.
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### **6.2 HWF Leader (Leader)**

- a) Report to and assist the Supervisor as required.
- b) Understand and comply with the procedures and guidance established in this Standard Operating Procedure.

### **6.3 HWF Disposer/Driver (Disposer/Driver)**

- a) Understand and comply with the procedures and guidance established in this instruction.
- b) Perform all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Verify HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### **6.4 CSW Profile Specialist (Profile Specialist)**

- a) Maintain Hazardous Waste Profile Sheets for waste managed by HWF management personnel.
- b) Assist Disposers and Supervisors with technical questions and waste classification.

## **7.0 PROCEDURES**

### **7.1 Unacceptable (not permitted) wastes**

HWF personnel are not permitted to process the following items as hazardous waste:

- High or low-level radioactive waste of material.
- Bio-infectious wastes, sewage, urine and feces.
- Bio-hazardous wastes including non-RCRA pharmaceuticals (see section 5.0(b), Definitions)
- Medical wastes, drugs (esp. DEA controlled substances), needles, and sharps.
- Explosives, ammunition, bombs and pyrotechnics.
- Trash, wet garbage, and inedible food

Refer to 'Contact List for Waste not Managed at CSW' (Enclosure 9) for guidance on managing the above items.

## **7.2 Data Collection and Waste Evaluation**

### **7.2.1 Prior to Pickup**

- a) Generating activities are encouraged to contact the Supervisor with information about materials not currently listed on an approved profile.
- b) Waste without a profile, must have one completed prior to being picked up. Typically, the Profile Specialist will work with environmental personnel from the activity generating the waste. This will ensure the waste is characterized and profiled correctly.
- c) The Disposer loads safety gear such as hard hat, spare overpack, containers (plastic bags and drums) spare drum labels, and other required supplies for the truck.

### **7.2.2 At Pickup**

- a) Select a suitable parking location, park and secure vehicle and place safety cones at front and rear of vehicle.
- b) Collect/Evaluate Information.
- c) Use the Profile Summary (Enclosure 6) to categorize the materials to be picked up and determine what documentation is required.
- d) For each shipping package, the Disposer will determine if the contents are unused or spent and collect any required documentation. The Supervisor or Profile Specialist will be consulted if there are questions about what data is needed.
  - The Disposer will check for a Defense Logistics Agency Distribution Services (DLA DS) or Fleet Industrial Supply Center (FISC) Rejection Sticker. If no Rejection Sticker is affixed to the container and the material appears to be usable, the Disposer will request that the customer contact FISC and DLA DS as appropriate. If time constraints prevent the customer from taking the appropriate action, the Disposer will contact the Supervisor and the Supervisor will take the following action:
    - i. The Supervisor will contact the FISC Zone Manager at 619-556-6210 to make arrangements for FISC to evaluate whether or not the material is acceptable for reuse. The material will be segregated from other waste and stored until FISC has accepted or rejected the material.
    - ii. If the material is rejected by FISC the Supervisor will contact the DLA DS Environmental Protection Specialist at 619-437-9800. If the material is accepted by DLA DS the Supervisor will initiate a form DD-1348.
    - iii. If the material is rejected by DLA DS, the Supervisor will contact other interested parties e.g. IWOW to see if the material can be reused.
    - iv. Once steps i-iii above have been exhausted and it is determined that the material cannot be reused, the material will be disposed as Hazardous Waste.
- e) The collected Safety Data Sheet (SDS) and Analytical information are compared to the approved profile list. If the SDS/Analytical is different, the Supervisor or Profile Specialist

will be called to ensure proper categorization. Copies of new documents are added to the appropriate profile.

- f) Verify contents are consistent with documentation and labeling
- For small containers (< 5 gallons) of unused material, the Disposer will ensure the SDS is in hand. If it is a new SDS, it must be reviewed to ensure it is consistent with the assigned profile. The Supervisor or Profile Specialist will be consulted if there are any questions.
  - Containers, five gallons or larger, will be opened to verify the contents are consistent with labeling. Opening containers of some types of waste may require special consideration, i.e. equipment, or PPE.
  - Review the SDS to determine the hazards of the material in the container. This will be used to determine appropriate PPE. If there are any questions, call the Supervisor or Profile Specialist with questions.
  - Ensure a person is present to observe the Disposer while containers are being opened.
  - Corrosives cannot be inspected unless an eye wash/shower station is within 100' or 10 seconds of where the containers are opened.
  - Determine if the container is safe to open. Containerized materials that are toxic by inhalation appear to be pressurized, or present any other unsafe condition shall not be opened and should not be visually inspected.
  - If conditions will not allow for safe visual verification, the Disposer must call the Supervisor to verify that containerized material can be inspected at the receiving facility. The decision is documented on the Waste Turn-In form.
  - The Disposer weighs each item on scale, and records weights on Waste Turn in Form.
  - Utilize overpack containers for damaged containers, and when inspected containers cannot be properly secured.
  - Secure marked bags and containers < 5-gallons in a tri-wall type box or crate or shrink-wrapped to a pallet.
  - If a material/waste is an unknown as defined in **5.0 j** the Disposer must now follow SOP HW-05-024 [Procedures for Unknowns] to assess the hazard(s) and determine appropriate precautions before proceeding.
  - Retrieve cones, visually inspect truck bed for loose containers and secure gates.

### 7.2.3 Resolve Inconsistencies

Any differences among the waste item, profile description, documentation, and labeling will be resolved prior to pickup. The Disposer may verify specific aspects of the characterization by conducting field tests. These tests serve as a basis for further investigation or analytical testing. Waste is not characterized based on field tests. Discrepancies are resolved through additional dialog with the activity's environmental personnel or samples are taken for testing at a certified lab. The following field tests may be conducted.

- a) The pH of mixed or spent corrosive waste is verified with colorimetric pH paper. To accomplish this, dip a pH test strip into the sample or sample of the solution. Compare the test strip color result with the color chart located on the pH test paper container to determine the sample's corrosive properties. The test strips are only effective with aqueous samples with limited coloration.
- b) Potassium Iodide-starch colorimetric test strips verify the oxidizing characteristic of mixed or spent oxidizing compounds. To accomplish this, dip an acidified Potassium Iodide-starch test strip into the sample or the sample mixed with water. The test strips are only effective with acidic samples. If the sample is neutral or basic, the test strip must be saturated with hydrochloric acid or similar pH adjusting solution before being exposed to the sample. A purple to black color is a positive result for a strong oxidizer.
- c) The presence of organic peroxide compounds in solvents known to form peroxides under unfavorable storage conditions is verified with colorimetric peroxide test strips. (See Enclosure 8 for instruction). Containers with peroxide forming compounds will be thoroughly evaluated before handling or testing. Consult with the Profile Specialist before moving them. Based on the following information, the Profile Specialist will recommend testing or other management methods:
  - Condition of the container;
  - Chemical compounds present;
  - Length and conditions of storage; and
  - Presence of crystals
- d) Mixed POLs are checked with a corona discharge sensor for the presence of halogenated organic compounds (refer to the unit's operator manual for instructions). Results of the corona discharge sensor may be verified or quantified with a Chlor-D-Tect test kit. (Refer to instructions located on the Chlor-D-Tect test kit)
- e) The presence of water in recyclable oil is verified with volumetric sampling devices such as a "drum thief". All drums will be sampled prior to loading on the truck. Drums with less than 10% water by volume will be accepted for recycling. Drums with more than 10% water by volume will be segregated for possible treatment at the NASNI water treatment facility.

### **7.3 Location Specific Requirements**

#### **7.3.1 Pier Service Pick-Ups**

- a) Shipboard HW will be turned into HWF personnel on the pier at times published in the Weekly Pick-up Schedule, Naval Base San Diego (Enclosure 1).
- b) Except for Naval Amphibious Base (NAB) Coronado, Navy Activities will not deliver HW to HWFs.
- c) The Disposer will ensure that the HWF truck remains on the pier long enough to service the ships. If unforeseen events prohibit the Disposer from servicing a pier customer, the situation will be immediately reported to the Supervisor.

- d) If the Disposer determines that it will require more time or resources to off-load a ship than is allowed by the Weekly Waste Pick-Up Schedule, the Disposer shall immediately contact the Supervisor for instructions.
- e) The Ship's HW Coordinator may schedule non-routine or emergency HW turn-in by contacting the Supervisor.

### 7.3.2 San Clemente Island Pick-Ups

San Clemente Island (SCI) has a 90-day HW storage site. The Naval Base San Diego (NBSD) Supervisor will coordinate transportation of HW from San the Clemente Island site as follows:

- a) Customer faxes or emails the inventory and SDSs to the Supervisor at NBSD.
- b) A flight is scheduled for a Technician to travel to the island.
- c) The Supervisor establishes a point of contact (POC) who will be at SCI and assume responsibility for getting the waste loaded on the barge.
- d) The Technician inspects and segregates the waste.
- e) The Technician prepares shipping paperwork, manifest and labels and prepares the containers for shipment.
- f) The Supervisor coordinates transportation by barge through the POC.
- g) Before the Technician leaves SCI he/she will:
  - i) Attempt to get the Barge Captain's (or authorized representative) signature on the manifest(s)
  - ii) Have the Barge Captain retain all manifest copies except the Generator Initial Copy. The Disposer will bring the Generator Initial copy of the manifest(s) back to NBSD and deliver to the HWF Supervisor.
  - iii) Brief the SCI POC.
  - iv) If a signature cannot be obtained from the Barge Captain or representative, the Technician briefs the SCI POC and turns all manifests over to them.
  - v) If all of the manifests were turned over to the SCI POC, the HWF Supervisor will inform the CSW Manager and NAVFAC NTR.
- i) The Technician receives the waste at the pier and transports it by truck to the NBSD HWF. (If it is after hours the pier will be locked and the waste will be picked-up the next morning).

### 7.3.3 Shipyard Service Pick-Ups

- a) For off-site collection and transportation of HW, ship's HM Coordinators, or a representative from the Southwest Region Maintenance Command (SWRMC) will call the Supervisor to arrange for services.
- b) The ship's representative must provide detailed information to the Supervisor about the HW being collected and the location.
- c) The Supervisor will complete the Hazardous Waste Pick-Up Scheduling Record (Enclosure 2), documenting the pick-up details.

- d) The Supervisor must confirm the pick-up appointment and provide the activity representative with a service date and time.
- e) The Disposer will follow the steps in 7.3.1 above when picking up the waste.

#### 7.4 Labeling Hazardous Waste

HW must be labeled in accordance with local, state, Federal and Navy regulations. A Hazardous Waste Label (Enclosure 5) is used. Labels can be obtained from any HWF. For waste that is transported on a Hazardous Waste Manifest over public roads, an Off-Base Hazardous Waste Label needs to be used (Enclosure 7). General instructions for completing the hazardous waste label are as follows:

- a) Generator Information:
  - Name
  - Address
  - City/State/Zip
  - Contents/Composition" Describe the contents of the container
  - (For example: latex paint, debris/paint chips, and oil soaked rags).
  - Any hazardous constituents must be listed on the label. If there are two or more, at least two must be on the label.
- b) Physical State: Check the box that describes the physical state of the hazardous waste.
  - Solid: The waste composition is a dry solid.
  - Semi Solid: The waste composition is a thick sludge.
  - Liquid: The waste composition is liquid.
  - Gas: The waste is a gas at standard temperature and pressure.
- c) Hazardous Properties: Check the box that describes the hazard of the waste.
  - Ignitable: Flash point below 140 F or is an oxidizer.
  - Corrosive: pH less than or equal to 2 or greater than or equal to 12.5.
  - Toxic: Harmful to humans, or the environment.
  - Reactive: Ex. Reacts violently when mixed with water.
- d) Accumulation Start Date (ASD): The date entered on the label should be the date that the waste or material was determined to be a hazardous waste and the decision was made to dispose of it. .
- e) Labeled by: Enter the initials of person completing the label.
- f) The container weight, control number and profile number must also be written on the label.

#### 7.5 Overpacked Container Labeling

While in storage, multiple overpacked or shrink-wrapped containers of hazardous waste, i.e. numerous 5-gallon containers of HW on a single pallet, ***need not*** be individually labeled with a HW label until they are being readied for transportation on the public roadway. At that time, each individual container must be labeled with a proper DOT HW label and other proper DOT labels and markings for transportation. Specific regulations:

- a) 49 CFR 171.8 defines the shrink-wrapping of individual packages secured to a pallet as an overpack.
- b) 49 CFR 173.25 states the requirements of DOT labeling and marking of the overpack. The inside packages are considered individual packages and should be labeled and marked individually as required by DOT.

## **7.6 Documentation Requirements**

### **7.6.1 Waste Turn-In Forms**

- a) Each HW turn-in requires the completion of the customer section of the Waste Turn-In Form (Enclosure 3).
- b) Disposers will complete the "Use" section of the Waste Turn-In Form and if necessary, will provide guidance to ship's personnel on the completion of the "Customer Use" section. Additional information required is:
  - Field test results (visual check, ph test, halogen test meter readings)
  - Copies of new MSDS's &/or analytical
  - Where a container has more than one applicable MSDS, a copy of each may be attached to the outside of the container.
- c) Each form must have a valid Control Number (see Enclosure 3) before waste can be picked-up.
- d) Each product item described should include the name of the product or the NSN with the name of the manufacturer.
- e) A copy of the Waste Turn-In Form will be left with the ship's representatives at the time of the turn-in. This copy serves as a receipt for wastes, which were turned in to the HWF facility for disposal.
- f) Disposers will characterize the HW being turned in, assign a profile number, and weigh each waste type (by hazard class or profile), documenting the weight on the Waste Turn-In Form.
- g) Disposers will select the appropriate "type service" code for each type of HW.

### **7.6.2 Uniform HW Manifest and Land Disposal Restriction (LDR) Notification**

- a) For off-site pick-ups of HW, the Disposer shall prepare a manifest, and if necessary, LDR notification. Refer to SOP HW-05-006 for instructions on completing a Uniform HW Manifest.
- b) If the manifest is not prepared ahead of time, the Supervisor shall allow sufficient time for manifest and LDR preparation to avoid interference with the scheduled pick-up time.

### **7.6.3 Safety Data Sheets (SDS)**

In most instances, the ship's HW Coordinator will be asked to provide SDS when turning in HW. SDS will be required if the HW is:

- a) A material being turned in as waste that may be unused or out-of-date where the Supervisor does not already have a copy of the SDS.
- b) Open Purchase, lacking a Navy Stock Number (NSN).
- c) Mixed or consolidated HW for which the components are known.

#### 7.6.4 Lab Analysis Reports

Occasionally, certain HW will require lab analysis reports to resolve uncertainties and properly dispose the HW item. Lab services can significantly impact the final cost of HW disposal; therefore, it is important for ship's personnel to keep accurate documentation of all HM including a description of the process generating the waste. HWF personnel will provide technical assistance for properly specifying and ordering analytical testing services, or documentation necessary to properly characterize the HW. To obtain technical assistance, ship's representatives should, contact the respective HWF facility at 619-545-6520.

The following types of waste will require analysis:

- a) Mixed or consolidated HW from processes where SDS and the Generator's knowledge are insufficient to properly characterize the waste.
- b) Products that have been used for their intended purposes (ie. cleaners, degreasers, etc.) where SDS and Generator's knowledge are insufficient to properly characterize the waste.
- c) Unknown HW.
- d) Non-routine and open purchase HW lacking documentation.

#### 7.7 HW Profile Sheet

Standardized profiles for routine waste streams are maintained and are on file at the HWF facility. On occasion, it may be necessary to establish a new HW profile to facilitate disposal. If requested, HWF personnel will provide technical assistance to help ship's personnel characterize and profile HW. A sample profile is provided in Enclosure (4). Profiling assistance can be obtained by calling the respective HWF at 619-545-6520.

#### 7.8 HW Container Packaging, Marking and Labeling

The HWF will accept HW in containers, which are in good condition and correctly marked and labeled. The Disposer will check and correct/complete any labels not properly completed prior to transport.

##### 7.8.1 Pier Service Turn-in Containers

HW turned in on the pier will be accepted in bags, boxes, and drums, contingent upon the following requirements.

- a) Containers are in sound condition and free from leaks.
- b) Lids on all containers are sealed tightly and have all bungs, nuts, and bolts in place.
- c) Whenever possible, all liquid HW is packaged in original or navy supplied DOT closed top containers.
- d) Some waste, such as paints and solvents release volatile organic compounds (VOCs) into the atmosphere. All containers holding such HW must be tightly sealed to prevent spills and the release of VOCs.
- e) Solid HW may be placed in bags and boxes only if the packages are tightly closed and sealed to prevent the release of HW.
- f) Corrosive liquids should be packaged in closed-top poly containers.

- g) Corrosive solids must be packaged in open-top poly, plastic lined steel, or plastic lined fiberboard containers.
- h) HW must be packaged and staged in a manner that completely segregates incompatible HW. Do not mix incompatible HW on the same pallet or stage in close proximity to each other.

#### **7.8.2 Pier Service Container Marking**

All HW containers must be marked in accordance with the references. HWF personnel will furnish generators with HW labels (see Enclosure 5) to fulfill the regulatory requirements for storage. If requested, HWF personnel will offer guidance and assistance in preparing HW labels.

#### **7.8.3 Shipyard Service Turn-In Containers**

HW transported on public highways must be packaged in containers that meet DOT specifications. Reference (c) outlines the specific requirements for DOT packaging. At a minimum, DOT packaging must meet the following conditions:

- a) Packaging must be in sound condition, free from rust, dents and leaks.
- b) Lids on all containers must be sealed tightly and have all bungs, nuts and bolts in place to prevent the release of HW or VOCs.
- c) Whenever possible, all liquid HW should be packaged in closed top containers.
- d) Corrosive liquids should be packaged in closed-top poly containers; however, steel containers may be used if appropriate plastic liners are in place.
- e) Corrosive solids must be packaged in open-top poly, plastic lined steel, or plastic lined fiberboard containers.
- f) HW must be packaged and staged in a manner that completely segregates the incompatible HW. Do not mix incompatible HW on the same pallet or stage in close proximity to each other. Incompatible HW should never be lab packed together.
- g) Containers must meet the packing group requirements found in Reference (c).
- h) Containers must be UN marked with DOT specifications, which are in a visible location on the container.

#### **7.8.4 Shipyard Service Container Marking**

- a) All containers transported across public highways will display DOT approved markings. Reference (c) defines marking and labeling as separate requirements.
- b) When the Disposer arrives at the pick-up site, he or she can expect to find the HW containers with the generator's HW storage labels affixed. The Disposer will ensure these labels are removed and replaced with labels containing the markings required in Reference (c).
- c) The Disposer will furnish generators with HW labels, which are easy to complete and fulfill the regulatory requirements for storing HW. However, DOT labels will not be dispensed to generators. Instead, they are reserved exclusively for HWF use.
- d) The container weight, control number and profile number must also be written on the label.

#### **7.8.5 Shipyard Service Container Label**

- a) All containers being transported across public highways shall be labeled in accordance with Reference (c).

- b) Prior to loading containers, the Disposer will affix the required DOT labels to all packages, which are transported across public highways. The label shall be placed on the container in close proximity to the DOT markings.

#### 7.8.6 Packaging, Marking and Labeling of Aerosols

- a) Aerosols must be packaged in a manner to prevent discharge while in transport or subsequent storage. Either ensuring that the protective cap for each can is securely affixed or removal of the valve stems can accomplish this.
- b) The DOT essentially adopted the requirements of DOT-SP-12842 in 49 CFR 173.306(k) with regard to when the weight of the container exceeds 66 pounds except when shipped on a common carrier unless under exclusive use. The SP is no longer needed for our purposes.

#### 7.8.7 Packaging, Marking and Labeling of Batteries

- a) Batteries must be segregated by type and packaged in a manner, which will prevent short-circuiting during transport or subsequent storage. This can be accomplished by taping one or both terminals with clear packing tape, duct tape or other suitable means to prevent short circuiting. Batteries will not be transported unless both criteria listed above are met.
- b) DOT issued an Interpretation Letter (reference g) providing relief for the packaging of used or **spent** dry, sealed alkaline and carbon zinc batteries with a marked rating of 9-volts or less and that are described as "Batteries, dry, sealed, n.o.s." in the Hazardous Materials Table in 49CFR §172.101. Batteries of this type are not subject to regulation under the Hazardous Materials Regulations if the following conditions are met:
  - i) They must be packaged separately from all other types of batteries of different sizes or chemistries.
  - ii) The batteries must be **spent**. If it cannot be confirmed that the batteries are spent, then the terminals must be protected from short circuit prior to packaging.
  - iii) Batteries connected in series must be disconnected before being packaged.
- c) Lithium Ion batteries (profile UW36) are separated from other lithium batteries (UW30). Affix a Lithium Ion Battery Caution label on the container before shipment (see enclosure 10).

#### 7.8.8 Packaging, Marking and labeling of Oxygen Generators

Unspent oxygen generators are received in Emergency Escape Breathing Devices (EEBD), Oxygen Breathing Apparatus (OBA) canisters, and Oxygen Candles. Improper handling of these items poses a great storage and transportation risk. HWF personnel preparing these materials for transport must have had the proscribed DOT approved training. Materials found not complying, will be immediately reported to the Supervisor and be made to comply before the end of the day.

**Reference (f) 49 CFR 173.168 Chemical Oxygen Generators** specifies the following acceptable means of preparing this waste for shipment:

- j) Intact mechanical/chemically actuated devices must be prevented from accidental actuation by two independent means. This may be two pins, a pin and retaining ring or a pin and securely attached cover.

- k) Electrically actuated devices must have the electrical leads mechanically shorted and then shielded in metal foil.
- l) Devices without a means of actuation must have a cover over the primer to prevent actuation from external impact.
- m) Oxygen generators installed in equipment must have actuating pins in place and be enclosed in a protective bag, pouch, case or cover. The outside container must have the following statement marked on the outside:

**“This Item Contains an Oxygen Generator”.**

- n) Before packaging, they must be capable of sustaining a 1.8-meter fall in a manner most likely to cause accidental actuation without actuating.
- o) The shipping container must comply with 49 CFR §173.168 for generators in Protective Breathing Equipment or 49 CFR §173.213 for spent generators **and** the container must be marked to indicate the presence of the generator along with the following statement:

**“This Package is not Authorized for Transportation Aboard Aircraft”.**

#### **7.8.9 Packaging, Marking and Labeling of Asbestos**

- a) 29 CFR 1910.1001(j)(2), 1926.1101(k)(8) and Title 8 CCR 5208(j)(5) are the regulatory citations requiring the asbestos warning label. As such, the package needs to be marked with the Asbestos Danger label (see Enclosure #10 CSW-022).
- b) When packaged in bulk, mark opposing sides with the asbestos warning label.

#### **7.8.10 Supplies**

HWF personnel will provide, free of charge, blank Waste Turn-In forms, blank HW storage labels, copies of Pier Pick-Up Schedules, and empty containers that meet DOT specifications. Navy clients who desire information on how to obtain these supplies can call the HWF that services their location.

#### **7.9 Alternate Turn-In Procedures**

OPNAVINST 5100.19D turn-in procedures may be used as an alternative to simplified local turn-in procedures described above. The HWF will accept HW using the procedures outlined in Reference (d). All ship's personnel who are turning in HW and are using the procedures outlined in Reference (d) must fully comply with all of the requirements of Chapter C23 of that instruction.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Waste Turn-In Procedures for Shore Activities

**References:**

- (a) Code of Federal Regulations, Title 40, Part 261-263
- (b) California Code of Regulations, Title 22, Part 66261-66264
- (c) California Health & Safety Code, Division 20
- (d) Code of Federal Regulations, Title 49, Part 171-180
- (e) 49 CFR §173.306(k) Aerosols for recycling or disposal
- (f) 49 CFR §173.168 Chemical Oxygen Generators
- (g) PHMSA Interpretation Letter, Reference No. 09-0112R

**Enclosures:**

- (1) CSW-003 (Weekly Pick-Up Schedule, Naval Base San Diego-Shoreside)
- (2) CSW-012 (Naval Base Coronado Pick-Up Schedule)
- (3) CSW-013 (Weekly Pick-Up Schedule, Naval Base Point Loma)
- (4) CSW-006 (Hazardous Waste Profile Sheet)
- (5) CSW-007 (Hazardous Waste Label)
- (6) CSW-005 (Waste Turn-In Form)
- (7) CSW-009 (Off-Base Hazardous Waste Label)
- (8) CSW-011 (Contact List for Waste not Managed at CSW)
- (9) CSW-008 (Profile Summary)
- (10) CSW-004 (Hazardous Waste Pick-up Scheduling Record)
- (11) CSW-010 (Instructions for Quantofix Peroxide Test Strips)
- (12) CSW-022 (Asbestos warning label)
- (13) CSW-087 (Lithium Ion Battery Warning Label)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed for Service Provider personnel providing services. Guidelines are provided for acceptance of Hazardous Waste (HW) and Hazardous Material (HM) generated by shore activities and for the disposal of HM that has been rejected by the Hazardous Material Minimization Center (HMMC) and the Defense Logistics Agency Distribution Services (DLA DS) in accordance with the cited references.

## 2.0 BACKGROUND

The Service Provider operates Consolidation, Storage, and Transfer Facilities (HWF) and provides HW and HM collection and disposal services to Navy and Marine Corps Installations in the San Diego area. The Environmental Protection Agency has established regulations governing the management of HW. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day HWF with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This procedure defines the HW turn-in procedures for shore activities and gives guidance to personnel on HW and HM acceptance and turn-in procedures.

#### 4.0 ACTION

This document applies to all personnel providing CSW Services, including disposal of HW and HM in accordance with federal and state regulations.

#### 5.0 DEFINITIONS

- a) **Accumulation Start Date** - date the waste was determined to be a hazardous waste and the decision was made to dispose of it.
- b) **Bio-Hazardous Waste** – any waste defined in California Health & Safety Code Division 104, part 14, §117635.
  - Laboratory waste including human or animal specimen cultures from medical or pathology labs, cultures or stock of infectious agents, waste from the production of bacteria, viruses, spores, or vaccines or devices/containers used to contain them.
  - Human tissue or specimens from surgery or autopsies suspected of being contaminated with infectious agents known to be contagious to humans.
  - Animal parts, tissues or fluids suspected of being contaminated with infectious agents known to be contagious to humans.
  - Waste which contains recognizable fluid blood, blood products or blood from animals known to be infected with diseases which are highly communicable to humans.
  - Waste containing materials contaminated with excretion, exudates or secretions from humans or animals which require isolation to protect others from highly communicable diseases.
  - Waste which is hazardous only because it contains human specimens or tissues which have been fixed in formaldehyde or other fixatives or may contain chemotherapeutic agents including gloves, gowns, towels, empty bags or tubing.
  - Waste which is only hazardous because it is comprised of pharmaceuticals which are not hazardous waste as defined by the RCRA regulations.
  - Pharmaceuticals are prescription or over-the-counter drugs for use by humans or animals.
  - Drugs are any article or compound recognized within the veterinary or medical sciences to be used or intended for use to diagnose, cure, mitigate, treat or prevent disease.
- c) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- d) **CSW**- Containerized Solid Waste
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR §261.3 and Title 22 CCR §66261.3.
- f) **Hazardous Material** – (HM) any material or substance, which even in normal use, poses a risk to health, safety, or the environment.
- g) **Label** - the shape of a diamond and it measures 3.9" on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table in §172.101, with additional information available in Subpart E of reference (c).

- h) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- i) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- j) **Unknown** – an unmarked/unlabeled material which the customer cannot identify or a material misidentified by the customer.
- k) **Waste Turn-In Form** - an accounting document used to bill activities accounts for management of their HW.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the Containerized Solid Waste (CSW) Manager (CM).
- b) Be responsible for the overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in this SOP.
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader (Leader)

- a) Report to and assist the Supervisor as required.
- b) Understand and comply with the procedures and guidance established in this Standard Operating Procedure.

### 6.3 HWF Disposer/Driver (Disposer/Driver)

- a) Understand and comply with the procedures and guidance established in this instruction.
- b) Perform all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Verify HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### 6.4 CSW Profile Specialist (Profile Specialist)

- a) Maintain Hazardous Waste Profile Sheets for waste managed by HWF management personnel.
- b) Assist Disposers and Supervisors with technical questions and waste classification.

## 7.0 PROCEDURES

### 7.1 Pick-Ups

The Service Provider provides HW and HM collection, storage and disposal services to San Diego area Navy and Marine Corps activities. Enclosures (1), (2), and (3) list the shore activity pick-up schedules for Naval Base San Diego, Naval Air Station North Island, and Submarine Base Point Loma respectively. Customers on the dry side of the Naval Amphibious Base deliver their waste to the HWF for processing. (See Section 7.6 Labeling Hazardous Waste). All other shore activity pick-ups which are not listed can be scheduled with the HWF by calling the appropriate number as listed below. The Hazardous Waste Pick-up Scheduling Record (Enclosure 10) should be completed documenting the pick up details.

Naval Base San Diego: 619-556-9600,

North Base Coronado: 619-545-6520,

Naval Base Point Loma: 619-553-1303,

If someone does not answer the phone, the phone message requests that the customer leave a message on the voice mail system. A HWF staff member will return such calls promptly.

### 7.2 Unacceptable (not permitted) wastes

The Service Provider is not permitted to process the following items as hazardous waste:

- High or low-level radioactive waste of material.
- Bio-infectious wastes, sewage, urine and feces.
- Bio-hazardous wastes including non-RCRA pharmaceuticals (see section 5.0(b), Definitions)
- Medical wastes, drugs (esp. DEA controlled substances), needles, and sharps.
- Explosives, ammunition, bombs and pyrotechnics.
- Trash, wet garbage, and inedible food

Refer to 'Contact List for Waste not Managed at CSW' (Enclosure 8) for guidance on managing the above items.

### 7.3 Actions Prior to Pickup

- a) Generating activities are encouraged to contact the Supervisor with information about materials, not currently listed on an approved profile.
- b) The Disposer loads safety gear such as hard hat, spare over pack containers (plastic bags and drum), spare container labels, and other required supplies on truck.

### 7.4 Actions at Pickup

- a) Select a suitable parking location, park and secure vehicle and place safety cones at front and rear of vehicle.

#### 7.4.1 Collect/Evaluate Information

- a) Use the Profile Summary (Enclosure 9) to categorize the materials to be picked up and determine what documentation is required.

- b) Waste that does not have a profile must have one completed prior to being picked up. Typically, the Profile Specialist will work with Environmental Personnel from the Activity generating the waste to ensure the waste is characterized and profiled correctly.
- c) For each shipping package, the Disposer will determine if the contents are unused or spent and collect any required documentation. The Supervisor or Profile Specialist will be consulted if there are questions about what data is needed.
  - The Disposer will check for a DLA DS or Fleet Industrial Supply Center (FISC) Rejection. If no Rejection, to the container and the material appears to be usable, the Disposer will request confirmation that FISC evaluated & rejected the waste. If time constraints prevent the customer from taking the appropriate action, the Disposer will contact the Supervisor and the Supervisor will take the following action:
    - i. The Supervisor will contact the FISC Zone Manager at 619-556-6210 to make arrangements for FISC to evaluate whether or not the material is acceptable for reuse. The material will be segregated from other waste and stored until FISC has accepted or rejected the material.
    - ii. If the material is rejected by FISC the Supervisor will contact the DLA DS Environmental Protection Specialist at 619-437-9800. If the material is accepted by DLA DS the Supervisor will initiate a DD-1348 form.
    - iii. If the material is rejected by DLA DS, the Supervisor will contact other interested parties e.g. IWOW to see if the material can be reused.
    - iv. Once steps i-iii above have been exhausted and it is determined that the material cannot be reused, the material will be disposed as Hazardous Waste.
- d) The collected SDS and Analytical information is compared to the approved profile list. If the SDS/Analytical is different, the Supervisor or Profile Specialist will be called to ensure proper characterization. Copies of new documents are added to the appropriate profile.
- e) Unused/unopened products must be accompanied by rejection documentation from FISC and DLA DS prior to disposal.

#### **7.4.2 Verify Contents are consistent with documentation and labeling**

- a) For small containers (< 5 gallons) of unused material, the Disposer will ensure the SDS is in hand. If it is a new SDS, it must be reviewed to ensure it is consistent with the assigned profile.
- b) Containers five gallons or larger, will be opened to verify the contents are consistent with labeling. Opening containers of some types of waste may require special consideration, i.e. equipment, or PPE.
- c) Review the SDS to determine the hazards of the material in the container. This will be used to determine appropriate PPE. If there are any questions, call the Supervisor or Profile Specialist with questions.
- d) Ensure a person is present to observe the Disposer while containers are being opened.

- e) If corrosives are being inspected, an eye wash/shower station must be with 100' or 10 seconds of where the containers are opened.
- f) Determine if the container is safe to open. Containerized materials that are "toxic by inhalation", appear to be pressurized, or present any other unsafe condition shall not be opened and cannot be visually inspected.
- g) If conditions will not allow for safe visual verification, the Disposer will call the Supervisor to see if the material can be verified at the receiving facility. The decision is documented on the Waste Turn-In Form.
- h) The Disposer weighs each item on the scale, and records weights on the Waste Turn-in Form (Enclosure 6).
- i) Utilize overpack containers for damaged containers, and when inspected containers cannot be properly secured.
- j) Secure marked bags and containers < 5-gallons in a tri-wall type box or crate or shrink-wrapped to a pallet.
- k) If a material/waste is an unknown as defined in **5.0 j** the Disposer must now follow SOP HW-05-024 [Procedures for Unknowns] to assess the hazard(s) and determine appropriate precautions before proceeding.
- l) Retrieve cones, visually inspect truck bed for loose containers and secure gates.

#### **7.4.3 Resolve Inconsistencies**

Any differences among the waste items, profile description documentation, and labeling will be resolved prior to pickup. The Disposer may verify specific aspects of the characterization by conducting field tests. These tests serve as a basis for further investigation or analytical testing. Waste is not characterized based of field tests. Discrepancies are resolved through additional dialog with the Activity's Environmental Personnel or samples are taken for testing at a certified lab. The following field tests may be conducted.

- a) The pH of mixed or spent corrosive waste is verified with colorimetric pH paper. To accomplish this, dip a pH test strip into the sample or sample of the solution. Compare the test strip color result with the color chart located on the pH test paper container to determine the sample's corrosive properties. The test strips are only effective with aqueous samples with limited coloration.
- b) Potassium Iodide-starch colorimetric test strips verify the oxidizing characteristic of mixed or spent oxidizing compounds. To accomplish this, dip an acidified Potassium Iodide-starch test strip into the sample or the sample mixed with water. The test strips are only effective with acidic samples. If the sample is neutral or basic, the test strip must be saturated with hydrochloric acid or similar pH adjusting solution before being exposed to the sample. A purple to black color is a positive result for a strong oxidizer.
- c) The presence of organic peroxide compounds in solvents known to form peroxides under unfavorable storage conditions is verified with colorimetric peroxide test strips. (See Enclosure 11 for instructions). Containers with peroxide forming compounds will be

thoroughly evaluated before handling or testing. Consult with the Profile Specialist before moving them. Based on the following information, the Profile Specialist will recommend testing or other management methods:

- Condition of the container;
  - Chemical compounds present;
  - Length and conditions of storage; and
  - Presence of crystals.
- d) Mixed POLs are checked with a corona discharge sensor for the presence of halogenated organic compounds (refer to the unit's operator manual for instructions). Results of the corona discharge sensor may be verified or quantified with a Chlor-D-Tect test kit. (Refer to instructions located on the Chlor-D-Tect test kit)
- e) The presence of water in waste or recyclable oil is verified with volumetric sampling devices such as a "drum thief". All drums will be sampled prior to loading on the truck. Drums with less than 10% water by volume will be accepted for recycling. Drums with more than 10% water by volume will be segregated for possible treatment at the NASNI treatment facility.

## 7.5 Packaging

HW turned in will be accepted in bags, boxes, and drums, contingent upon the following requirements:

- Containers are in sound condition and free from leaks.
- Lids on all containers are sealed tightly and have all bungs, nuts, and bolts in place.
- Whenever possible, liquid HW is packaged in DOT closed top containers.
- Some waste, such as paints and solvents release volatile organic compounds (VOCs) into the atmosphere. All containers holding such HW must be tightly sealed to prevent spills and the release of VOCs.
- Solid HW may be placed in bags and boxes only if the packages are tightly closed and sealed to prevent the release of HW.
- Corrosive liquids should be packaged in closed-top poly containers.
- Corrosive solids must be packaged in open-top poly, plastic lined steel, or plastic lined fiberboard containers.
- HW must be packaged and staged in a manner that completely segregates incompatible HW. Do not mix incompatible HW on the same pallet or stage in close proximity to each other.
- If the waste will be manifested and transported over the public highway, it must be packaged in DOT approved containers.
- DOT containers are available, free of charge, at the following locations and times:

Naval Base San Diego, Building 3458; M-F 0730-1500

Naval Base Coronado, Building 1606; M-F 0800-1500

Naval Base Point Loma, Building 375; M-F 0800-1500

Naval Amphibious Base, Building 145A; M-F 0800-1100

#### 7.5.1 Special Packaging for Asbestos

- a) Prior to being turned in for disposal, asbestos and asbestos contaminated waste which may produce airborne asbestos fibers shall be packaged in sealed, impermeable, non-returnable double bags each having a minimum thickness of 6 mil.
- b) Asbestos waste shall be made and maintained sufficiently wet to prevent asbestos fibers from becoming airborne. Asbestos waste must be marked with the OSHA Asbestos warning label as prescribed in 29 CFR 1910.1001(j)(2), 1926.1101(k)(8) and Title 8 CCR 5208(j)(5). (see Enclosure #12 CSW-022 Asbestos warning label.) For bulk containers, label opposing sides.

#### 7.5.2 Special Packaging for Batteries (Except Auto Type Lead Acid)

- a) Batteries must be segregated by type and packaged in a manner, which will prevent short-circuiting during transport or subsequent storage. This can be accomplished by taping one or both terminals with clear packing tape. Do not use Duct Tape. Batteries will not be transported unless both criteria listed above are met.
- b) DOT issued an Interpretation Letter (reference g) providing relief for the packaging of used or **spent** dry, sealed alkaline and carbon zinc batteries with a marked rating of 9-volts or less and that are described as "Batteries, dry, sealed, n.o.s." in the Hazardous Materials Table in 49CFR §172.101. Batteries of this type are not subject to regulation under the Hazardous Materials Regulations if the following conditions are met:
  - i) They must be packaged separately from all other types of batteries of different sizes or chemistries.
  - ii) The batteries must be **spent**. If it cannot be confirmed that the batteries are spent, then the terminals must be protected from short circuit prior to packaging.
  - iii) Batteries connected in series must be disconnected before being packaged.
- c) Lithium Ion batteries (profile UW36) are separated from other lithium batteries (UW30). Affix a Lithium Ion Battery Caution label on the container before shipment (see enclosure 12).

#### 7.5.3 Special Packaging for Auto Type Lead Acid Batteries

- a) Auto type lead acid batteries in good condition with caps in place and no evidence of leaking may be stacked neatly and secured to a non-metal pallet for shipment.
- b) If the batteries are double-stacked on the pallet, layers must be separated to prevent damage or short circuiting during transportation. This is typically accomplished with a corrugated cardboard insert.
- c) Broken or leaking batteries must be packaged in a DOT approved container. Metal containers are not acceptable.

#### 7.5.4 Packaging, Marking, and Labeling of Aerosols

- a) Aerosols must be packaged in a manner to prevent discharge while in transport or subsequent storage. This can be done by ensuring the protective cap for each can is securely affixed or removal of the valve stems.
- b) If the aerosols will be transported over the public roadway they must be packaged in a strong outer package, the gross weight of the container must not exceed 1,100 pounds, and they must be transported by a private or contract carrier as per Reference (e).

#### **7.5.5 Packaging, Marking and labeling of Oxygen Generators**

Unspent oxygen generators are received in Emergency Escape Breathing Devices (EEBD), Oxygen Breathing Apparatus (OBA) canisters, and Oxygen Candles. Improper handling of these items poses a great storage and transportation risk. Personnel preparing these materials for transport must have had training on this DOT Section. Materials found not complying, will be immediately reported to the Supervisor and be made to comply before transportation over the public roadway and the end of the day.

**Reference (f) 49 CFR 173.168 Chemical Oxygen Generators** specifies the following acceptable means of preparing this waste for shipment.

- a) Intact mechanical/chemically actuated devices must be prevented from accidental actuation by two independent means. This may be two pins, a pin and retaining ring or a pin and securely attached cover.
- b) Electrically actuated devices must have the electrical leads mechanically shorted and then shielded in metal foil.
- c) Devices without a means of actuation must have a cover over the primer to prevent actuation from external impact.
- d) Oxygen generators installed in equipment must have actuating pins in place and be enclosed in a protective bag, pouch, case or cover. The outside container must have the following statement marked on the outside.

**“This item contains an Oxygen Generator”**

- e) Before packaging, they must be capable of sustaining a 1.8 meter fall in a manner most likely to cause accidental actuation without actuating.
- f) The shipping container must comply with 49 CFR 173.168 for generators in Protective Breathing Equipment or 49 CFR 173.213 for spent generators **and** the container must be marked to indicate the presence of the generator along with the following statement:

**“This Package is Not Authorized for Transportation Aboard an Aircraft”.**

#### **7.6 Labeling Hazardous Waste**

Hazardous Waste must be labeled in accordance with local, state, federal and Navy regulations. The Service Provider has designed a generator's Hazardous Waste Label (Enclosure 5) that is

easily filled out. Labels can be obtained from any HWF. For waste that is transported on a Hazardous Waste Manifest over public roads, an Off-Base Hazardous Waste Label (Enclosure 7) needs to be used. The mandatory information described below must be completed regardless of the format. General instructions for completing the hazardous waste label are as follows:

a) **Generator Information:**

- Name
- Address
- City/State/Zip
- Contents/Composition" Describe the contents of the container (For example: latex paint, debris/paint chips, and oil soaked rags).
- Any hazardous constituents must be listed on the label. If there are two or more, at least two must be on the label.

b) **Physical State:** Check the box that describes the physical state of the hazardous waste.

- Solid: The waste composition is a dry solid.
- Semi Solid: The waste composition is a thick sludge.
- Liquid: The waste composition is liquid.
- Gas: The waste is a gas at standard temperature and pressure.

c) **Hazardous Properties:** Check the box that describes the hazard of the waste.

- Ignitable: Flash point below 140 F or is an oxidizer.
- Corrosive: pH less than or equal to 2 or greater than or equal to 12.5.
- Toxic: Harmful to humans, or the environment.
- Reactive: Reacts violently when mixed with water.

d) **Accumulation Start Date:** The date entered on the label should be the date that the waste or material was determined to be a hazardous waste and the decision was made to dispose of it.

e) **Labeled by:** Enter the initials of person completing the label.

f) The container weight, control number and profile number must also be written on the label.

**Note:** Currently, generators on the dry side of Naval Amphibious Base bring their waste to the NAB 90 day storage. Therefore, all waste must be completely labeled prior to being accepted by CSW personnel.

## 7.7 Documentation Requirements

### 7.7.1 Waste Turn-In Forms

- a) Each waste turn-in requires the completion of the customer section of the Waste Turn-In form(s) (Enclosure 6).
- b) Disposers will complete the "Use" section of the Waste Turn-In form and if necessary will provide guidance on the completion of the "Customer Use" section of the Waste Turn-In form to activity personnel. The following additional information is required:

- Field test results (visual check, ph test, halogen meter readings)
  - Copies of new SDS's &/or analytical
  - Where a container has more than one applicable SDS, a copy of each may be attached to the outside of the container. At a minimum, the applicable SDSs must be listed or attached.
- c) Each form must have a valid Control Number (see Enclosure 6) before the waste can be picked-up.
- d) A copy of the Waste Turn-In form will be left with the generating activity's representative at the time of the turn-in, this copy serves as a receipt for wastes, which are turned in to the HWF for processing and disposal.
- e) Disposers will characterize the HW being turned in, assign a profile number, and will weigh each waste type (by hazard class or profile) individually, documenting the weight on the Waste Turn-In form.
- f) Disposers will select an appropriate "type service" code for each type of HW i.e. 3A, 3B, 3C.
- g) The Disposers will assess how closely the waste complies with the Region's Hazardous Waste Management Plan and mark a Risk Level (1 – 5) on the front of the form. In the Comments section, specific concerns with labeling, packaging or segregation are noted.
- h) The Activity Representative signs the Waste Turn-In Form to acknowledge the pickup.

#### **7.7.2 Safety Data Sheets (SDS)**

SDS for the material may be required when the Disposer arrives to conduct the pick-up. The Service Provider recommends that each customer should keep a file of SDS in order to assist in characterizing HW and that each customer be prepared to provide other supporting documentation for the standardized profiles for the command or code.

#### **7.7.3 Lab Analysis**

Occasionally, certain HW will require lab analysis to facilitate proper disposal. Maintenance of accurate documentation for each waste stream minimizes the need for lab analysis. Lab services can significantly increase the total cost of HW disposal. The Service Provider will review available documentation and provide assistance where necessary for determining what lab analysis is required. To obtain technical assistance, Activity representatives should contact the Service Provider at 619-545-6520.

#### **7.7.4 HW Profile Sheet**

The Service Provider has prepared standardized profiles for routine waste streams. If the generating activity's HW does not conform to their established standardized profile, the activity is required to fill out the profile sheet (Enclosure 4). If the HW is recurring the Service Provider will develop a standardized profile for the waste stream.

#### **7.7.5 Off-Base Container Marking**

- a) All containers transported across public highways will display DOT approved markings. Reference (d) defines marking and labeling as separate requirements. See Enclosure (7) for a sample label that contains DOT marking information.

- b) When the Disposer arrives at the pick-up site, he or she can expect to find the HW containers with the generator's HW storage labels affixed. The Disposer will ensure these labels are removed and replaced with labels containing the markings required in Reference (d). The generator's 90-Day Accumulation Start Date or the date of pick up is placed on the label as the Accumulation Start Date. If the generator's 90-Day Accumulation Start Date was used, it is lined out and replaced at the TSDF with the date the waste is accepted. If the pick up date was used, no date change is necessary at the TSDF. The Service Provider will furnish generators with HW labels, which are easy to complete and fulfill the regulatory requirements for storing HW. However, DOT labels will not be dispensed to generators. Instead, they are reserved exclusively for the use of the Service Provider. The container weight, control number and profile number must also be written on the label.

**7.8 Supplies** The Service Provider will provide, free of charge, blank Waste Turn-In forms, blank HW storage labels, copies of Pier Pick-Up Schedules, and empty containers that meet DOT specifications. Navy clients who desire information on how to obtain these supplies can call the HWF that services their location.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Bulk Consolidation of "Solid" Toxic Hazardous Debris

**References:**

- (a) Federal Register dated December 6, 1994, "Organic Air Emission Standards for Tank, Surface Impoundments, and Containers" Final Rule
- (b) Federal Register dated November 25, 1996, "Organic Air Emission Standards for Tanks, Surface Impoundments, and Container" Final Rule
- (c) Title 40, Code of Federal Regulations (CFR), Subpart CC, §264.1080- §264.1090
- (d) Title 22, California Code of Regulations (CCR) Chapter 14, Article 28.5, §66264.1080 - §66264.1090
- (e) Title 49, Code of Federal Regulations (CFR), Parts 172 and 173
- (f) Title 22, California Code of Regulations, (CCR), Chapter 11
- (g) Title 22, California Code of Regulations, (CCR), Chapter 14
- (h) Title 29, Code of Federal Regulation (CFR) §1910.23 (c)

**Enclosures:**

- (1) CSW-014 (Hazardous Waste Characterization for Contaminated Debris Table)
- (2) CSW-016 (Packing List)
- (3) CSW-005 (Waste Turn-In Form)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) provides guidelines for consolidation and management of "solid" toxic hazardous debris in bulk containers. Hazardous debris profiles include HT8A, HT45, HT50, HT54, HT55, HT85, HT95 and ND11.

## 2.0 BACKGROUND

Under the contract, the Service Provider operates Consolidation, Storage, and Transfer (CST) facilities and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day HWF with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, and disposal arrangements. The Service Provider has implemented bulk consolidation management procedures for "solid" toxic hazardous debris to maximize efficiency, lower disposal costs, and ensure proper waste management.

The Environmental Protection Agency has established regulations governing the management of HW. On December 6, 1994, the US Environmental Protection Agency promulgated air emission standards affecting the bulk containerization and storage of HW containing specific volatile organic compounds, reference (a). The rule applies to bulk containers managed in the permitted unit and the on-site generated 90-day waste storage area. The effective date of the final rule was June 5, 1995 with established compliance dates for different requirements of the rule. On November 25, 1996, the EPA promulgated amendments and clarified the regulatory text of the

final rule, giving facility owners and operators increased flexibility in meeting the requirements of the rule, reference (b). This SOP has been revised to ensure compliance with these standards.

### 3.0 SCOPE

This procedure defines the characterization, consolidation and storage of “solid” toxic hazardous debris into bulk containers that are subject to Subpart CC requirements, References (c) and (d).

### 4.0 ACTION

This document applies to all personnel providing CSW Services, including disposal of HW and HM in accordance with federal and state regulations.

### 5.0 DEFINITIONS

- a) **Action Levels** – The average volatile organic (VO) concentration action level for “solid” toxic hazardous debris that is required to be managed in a container using air emission controls is 500 parts per million weighted (ppmw). Containers holding “solid” toxic hazardous debris that have an average VO concentration less than 500 ppmw are not required to use air emission controls. This applies only to “Specific Volatile Organic Compounds” [Reference d].
- b) **Container** – Any bulk container with a design capacity greater than 119 gallons and used to manage HW that do not meet the definition of “in light material service”. For purposes of this SOP the term “Container” will be used interchangeably with the term “Roll-off”. For additional details consult Title 22, CCR §66264.1086 (b) (2) (B) [Reference d].
- c) **COR** – Contracting Officer’s Representative is the DLA DS representative with whom we interact.
- d) **Container Level 1 Standards** - Bulk container management is subject to Container Level I standards outlined in Title 22 CCR §66262.1086 [reference d]. This standard is a container that meets the applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation on then public roadways. For detail consult 49 CFR Part 172 and §173.240 [Reference e].
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR §261.3 and Title 22 CCR §66261.3.
- f) **Hazardous Material** – (HM) any material or substance, which even in normal use, poses a risk to health, safety, or the environment.
- g) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- h) **CSW**- Containerized Solid Waste
- i) **Debris** - Any inert material that is contaminated by a HM. This definition of debris includes soil, absorbent, and any other “solid” material with a particle size greater than 60 millimeters in diameter.
- j) **DGR** – Designated Government Representative is the Government representative authorized to approve requests related to the activities under this SOP.
- k) **DLA DS** – Defense Logistics Agency Distribution Services is the agency through which transportation and disposal services, for operations under the contract, are acquired. Exceptions can be authorized by the DGR.

- l) **Form DD1348-1** is a standard Defense Department document used to requisition material or services. For the purpose of this contract, it is generally used to request containers, transportation and disposal services. See SOP HW-05-031 for instructions.
- m) **Henry's Law Constant** - Henry's Law Constant is a number that is commonly used to predict the potential of a compound to volatilize. When a compound volatilizes it passes off, or evaporates, a vapor, which may require air emission, control. Henry's Law, from which this Constant is derived, states that at a given temperature, the amount of gas dissolved in a substance is directly proportional to the pressure of the gas above that substance. By using Henry's Law Constant we are able to determine which substances require air emission controls.
- n) **"In Light Material Service"** - Management of a HW where the vapor pressure of one or more of the components in the material is greater than 0.3 kPa at 20 deg.C (or .04 psi), and the total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 deg.C is equal to or greater than 20 percent by weight. A bulk roll-off weighing an average of 15,000 lbs would need to contain at least 3,000 lbs of one or more "Specific Volatile Organic Compounds" to be considered "In Light Material Service" Refer to Title 22, CCR §66260.10.
- o) **Roll-off** – A large metal container (typically 20, 30, or 40 cubic yards in capacity) used to store and transport solid materials.
- p) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) services to the Navy.
- q) **Sift Proof Packaging** - A packaging impermeable to dry contents, including fine solid material produced during transportation. Refer to 49 CFR, §171.8.
- r) **"Solid" Toxic Hazardous Debris** - Any non-liquid, non-saturated debris that exhibits the HW characteristic of toxicity in accordance with reference (f). The Hazardous Waste Characterization Table for Contaminated Debris (Enclosure 1) provides a list of commonly received toxic hazardous debris.
- s) **"Specific Volatile Organic Compounds"** - Any compound with Henry's Law Constant greater than or equal to 0.1 Y/X, (mole-fraction-in-the-gas phase/mole-fraction-in-the-liquid-phase). Consult Title 22, CCR §66264.1084 for waste determination procedure [Reference d].

## 6.0 RESPONSIBILITIES

### 6.1 CSW Manager (CM)

- a) Ensures the SOP conforms to applicable regulatory requirements and policies.
- b) Ensures the guidelines promote safe and efficient work practices.
- c) Ensures employees conducting work covered by the SOP have been adequately trained.
- d) Periodically reviews the SOP and makes modifications as appropriate.

### 6.2 HWF Supervisor (Supervisor)

- a) Trains employees conducting work covered by the SOP.
- b) Ensures the work is performed in accordance with the SOP as applicable.
- c) Reports instances of non-conformance to the CM and takes corrective action as necessary.
- d) Recommends changes which maintain regulatory compliance and promote safe and efficient work practices.
- e) Processes a DD Form 1348-1 when requesting a roll-off.
- f) Submits completed DD Form 1348-1 to DGR and DLA DS.
- g) Determines when a replacement roll-off is needed.
- h) Ensures proper placement location of roll-off.
- i) Inspects roll-off on arrival.
- j) Ensures 90-day accumulation time limit is not exceeded.
- k) Ensures waste is tracked and records maintained.
- l) Reviews and signs the Uniform Hazardous Waste Manifest and LDR.

### **6.3 HWF Leader/Disposer (Leader/Disposer)**

- a) Understands and complies with guidelines described in this SOP.
- b) Performs all work in a safe manner.
- c) Reports instances of non-conformance to the Supervisor, Compliance Manager or CM.
- d) Recommends changes which maintain regulatory compliance and promote safe and efficient work practices.

## **7.0 PROCEDURES**

### **7.1 Obtaining a Toxic Hazardous Debris Roll-off**

The process to obtain a toxic hazardous debris roll-off, which meets the sift-proof packaging criteria as required by 49 CFR, §173.240 (c) [Reference e], is as follows.

- a) Determine when a new or replacement “solid” toxic hazardous debris roll-off will be required. Allow sufficient time for the placement of the roll-off to ensure the full roll-off does not exceed the 90-day accumulation time limit. Request that the roll-off be fully lined and equipped with a cover that fully closes and is free of defects. Note: Replacement roll-offs will be exchanged for full roll-offs.
- b) Create a DD-1348-1 Form requesting a roll-off per SOP HW-05-031.
- c) Submit the completed the 1348-1 Form to the DGR for approval. Once approved, submit to the DLA DS COR.
- d) Oversee the proper removal of the full roll-off (including documentation) and placement of the replacement. Inspect both roll-offs as they are moved to ensure they are free of defects. If the integrity of either roll-off is unacceptable, notify the CM. If the replacement roll-off is unacceptable notify the DLA DS COR and request a different roll-off be placed onsite.
- e) The accumulation start date for the new roll-off is the earliest accumulation start date of material placed in it.

### **7.2 Waste Acceptance and Characterization**

Prior to consolidating a waste in the roll-off, it must have undergone the following processes:

- a) Waste Characterization - SOP HW-05-021
- b) Verification & Labeling– SOPs HW-05-003 or HW-05-004
- c) QC and Acceptance – SOP HW-05-028
- d) Waste Tracking – SOP HW-05-028

### **7.3 Visual Verification and Consolidation of “Solid” Toxic Hazardous Debris in the Tipping Hopper**

- a) Wastes are typically consolidated into a tipping hopper prior to being placed into the Solid Toxic Debris Roll-off. This is done to reduce the number of times the roll-off is opened and closed and to increase the efficiency of the consolidation process.
- b) The tipping hoppers are kept closed when material is not being added or removed. They are appropriately labeled, stored in a containment area and emptied into the roll-off prior to the end of the work day. Waste is not stored in the tipping hoppers overnight.
- c) Don the proper personal protective equipment (PPE), taking into consideration all chemical and physical hazards. If overhead work will be done, a hard hat should be worn.
- d) Attempt to consolidate onsite waste into the roll-off on the same day it is received. Waste manifested to the HWF (Naval Base San Diego or Naval Base Coronado) cannot be placed into the roll-off until the roll-off is manifested.
- e) Contents of each received container are removed (including any inner containers or bags) and compared to the label to verify their identification prior to being placed in the tipping hopper. Only appropriate wastes are placed in the tipping hopper. Indicate in the Drum # (s) column on the Waste Turn-In Form (Enclosure 3), which wastes are placed in the roll-off bin by placing the letters ‘RO’ (Roll-Off) in the column. Removed labels are shredded or defaced and placed in a separate container to be disposed as solid waste. All dry oil filters are also placed in separate containers for disposal.
- f) No liquids or containers with liquid residues are allowed in the roll-off. Materials such as adhesives and resins should be thoroughly inspected to determine if the material is fully cured. Fully cured adhesives and resins are solid and generally not flexible. Material not fully cured should not be consolidated with other solid waste. This will minimize the potential of chemical reactions and other potential hazardous conditions during and after waste consolidation.
- g) Any items found to be inconsistent with debris profiles or the Hazardous Waste label are reported to the Supervisor immediately.

### **7.4 Consolidation of “Solid” Toxic Hazardous Debris in Roll-off**

- a) Don the proper personal protective equipment (PPE), taking into consideration all chemical and physical hazards. If overhead work will be done, a hard hat should be worn.
- b) Attempt to consolidate onsite waste into the roll-off on the same day it is received. Waste manifested to the HWF (Naval Base San Diego or Naval Base Coronado) cannot be placed into the roll-off until the roll-off is manifested.

- c) Carefully open the rolling cover on the roll-off. Consolidate the debris into the roll-off starting from the middle and working back to each end of the roll-off. Consolidate into the roll-off, utilizing the tipping hopper. Employees are not to stand on top of the roll-off or enter the roll-off. Use the rake attachment to redistribute debris and be sure to secure the rake to the forklift. For additional details consult 29 CFR §1910.23 (c) OSHA Fall Protection Standard [Reference h].
- d) Roll-off contents may be compacted to maximize the weight
- e) When consolidation is complete, replace the roll-off cover ensuring the cover fits securely over all the edges of the roll-off. Lock the roll-off cover and door at the end of each shift.

## 7.5 Container Air Emission Standards

These standards are the required air emission controls for containers with VO concentrations greater than 500 ppm and are subject to the Subpart CC regulations [References (c) and (d)].

- a) The roll-off must meet the applicable DOT regulations on packaging HM materials for transportation as per 49 CFR §173.240 [Reference e].
- b) The roll-off shall be promptly closed and secured with the closure devices upon completion of the following activities: [Reference (c) and (d)]:
  - Consolidating quantities or batches of waste intermittently into the roll-off.
  - Filling the roll-off to its intended final level.
  - Consolidation activities cease and no additional material will be added to the container within 15 minutes.
  - The person performing the loading operation leaves the immediate vicinity of the roll-off.
- c) Containers and their covers and closure devices shall be inspected as follows:
  - Conduct a daily inspection of the roll-off.
  - When a defect is detected for the roll-off, cover, or closure devices, efforts to correct the deficiency shall be made no later than 24 hours after detection.
  - Repair shall be completed as soon as possible, but no later than 5 calendar days after detection.
  - If repair of the defect cannot be completed within 5 calendar days, then the hazardous waste shall be removed from the roll-off and the roll-off shall not be used to manage HW until the defect is repaired.

## 7.6 Tracking and Final Disposition

- a) Waste tracking shall be conducted in accordance with reference (g). All onsite debris profiles are consolidated into the Solid Toxic Debris Roll-off within two working days of receipt, the Supervisor will document the control number of the first and last item added on the Packing List (Enclosure 2). A detailed description of the contents of the roll-off can be printed from the EWBATS database. If all onsite debris profiles are not consolidated in the roll-off within two working days, all items added to the Solid Toxic Debris Roll-off are individually recorded on the Packing List. Any other materials added to the roll-off, will be individually entered on the Packing List with the following minimum information:

- Date Consolidated
  - Control Number
  - Description of the Waste
  - Profile# from the label
  - Initials of the person consolidating the material.
- b) The Supervisor monitors the level in the roll-off and the accumulation start date to determine when it must be prepared for disposal.
- c) Follow steps outlined in section 7.1 above.
- d) Review and sign the DLA DS contractor generated Uniform Hazardous Waste Manifest UHWM and associated Land Disposal Restriction Notifications (LDR). Ensure all records are accurate.
- e) Prior to transfer to the final disposal facility, the DLA DS contractor will weigh and record the roll-off weight on the manifest and delivery order documentation. Ensure all records reflect any corrections in weight.
- f) Update the environmental tracking system (EWBATS) by entering all pertinent information related to the removal of the roll-off. This will include: disposition date, delivery order number, manifest number and final weight for each item described on the Packing List.
- g) Maintain documentation per SOP HW-05-014.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Waste Manifesting

**References:**

- (a) Title 49 Code of Federal Regulations
- (b) Title 40 Code of Federal Regulations
- (c) Title 22 California Code of Regulations
- (d) U.S. Navy Environmental and Natural Resources Program Manual – OPNAVINST 5090.1 (Series)

**Enclosures:**

- (1) CSW-017 (EPA ID Number List)
- (2) CSW-018 (Waste Acceptance Form)
- (3) CSW-019 (Uniform Hazardous Waste Manifest)
- (4) CSW-020 (Manifest Correction Letter)
- (5) CSW-021 (Exception Report)
- (6) CSW-037 (Driver Vehicle Inspection Report)
- (7) CSW-006 (Hazardous Waste Profile Sheet)
- (8) CSW-023 (Completing the Manifest)
- (9) CSW-024 (Manifest Tracking Log)
- (10) CSW-025 (Management Method Codes)
- (11) CSW-026 (Manifest Flow Chart)
- (12) CSW-027 (Completing/Reviewing the LDR)
- (13) CSW-082 (Manifest Data Sheet)
- (14) CSW-094 (Pre-Transport Inspection Checklist)

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### 1.0 PURPOSE

The purpose of this procedure is to establish a Standard Operating Procedure (SOP) for personnel providing manifesting services.

### 2. BACKGROUND

The Service Provider manages EPA Identification Numbers (Enclosure 1) for Naval and Marine Corps activities in the San Diego area and provides manifesting services for Hazardous Waste (HW) generated by those activities. Manifesting services are provided for:

- a) Waste generated by federal activities and transported by a private hauler under government contract.
- b) Waste generated by federal activities and transported by employees of the Service Provider.
- c) Waste generated by a private company that is providing services to a Naval or Marine Corps activity under a government contract if the contract states that the Navy is the generator or co-generator of the waste.

The HW manifested includes such items as gasoline, solvent, paint thinner, asbestos, oil, fuel, spent abrasive blast media, Safety Kleen solvent, and bulk pumping waste. The Service Provider does not manifest infectious medical wastes, non-HW, unknown materials, or any solid wastes to be disposed in a Class III landfill (explosives may not be received at any HWF and must be manifested off-site directly from the generator's location).

### 3. SCOPE

This procedure defines manifest preparation and distribution, signature authorizations, transporter vehicle inspections (Enclosure 6 and Enclosure 14), and other certification requirements.

The SOP describes the duties and responsibilities of personnel associated with the manifesting process and include procedures for customers to obtain manifesting services. The step-by step procedure for preparing a Uniform Hazardous Waste Manifest (UHWM-Enclosure 3) is included in this SOP, however, references (a), (b), and (c) and the manifest preparation procedures detailed on the back of the last copy of any UHWM contain additional clarification.

### 4. ACTION

This document applies to all Service Provider personnel in the San Diego area, who are manifesting HW as authorized by the contract and CNRSW.

### 5. DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Hazardous Waste (HW)** – is any waste as defined in 40 CFR Part 261.3 and Title 22 CCR §66261.3.
- d) **Hazardous Material (HM)** – is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- e) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- f) **Uniform Hazardous Waste Manifest (UHWM)** – is a shipping paper required by Title 40 CFR and Title 22 CCR to document shipment of HW or non-RCRA HW.
- g) **Waste Turn-In Form** - is an accounting document used to bill activities accounts for management of their HW.

### 6. RESPONSIBILITIES

#### 6.1 CSW Manager (CM)

- a) Ensure that Supervisors are kept informed of customer/contractor manifesting issues that may result in command level attention.
- b) Maintains this SOP and incorporates changes and revisions.
- c) Ensures that manifest policy changes are communicated, in writing, to Service Provider personnel providing manifesting services prior to implementation.
- d) Ensures that Service Provider personnel who provide manifesting service are properly trained and authorized to sign manifests on behalf of CNRSW.

#### 6.2 HWF Supervisor (Supervisor)

- a) Ensures Disposers receive required training prior to being authorized to sign manifests.
- b) Ensures Leaders receive required training prior to being authorized to sign manifests.
- c) Ensures Disposers/Leaders training and signature authorization requests, and material requisitions for manifesting supplies are processed in a timely manner.

- d) Ensures Disposers/Leaders follow provisions of this SOP and that any necessary changes be proposed to the CM for approval prior to implementation.
- e) Ensures that "facility copies" of UHWMs are filed, kept on site, and are readily available for examination during regulatory inspections (this requirement only applies to the permitted TSDFs at NBSD and NBC).
- f) Ensures that the CM is kept informed of manifesting issues that may come to Business Line level attention (including Manifest Correction Letters, Exception and Discrepancy reporting requirements).

### **6.3 HWF Disposers (Disposers)**

- a) Prepare UHWMs in accordance with this SOP and references (a), (b), and (c).
- b) Adhere to the requirements of the SOP, submitting proposed changes or revisions to the Supervisor as necessary.

### **6.4 HWF Leaders/Record Keeper (Leader)**

- a) Immediately notify the CM or Compliance Manager when a situation arises that may require a Manifest Correction Letter, Exception Report or Manifest Discrepancy reporting for Significant discrepancies.
- b) Report questions about manifest tracking requirements of this SOP which may require communication with federal, state and local regulatory agencies, transporters and owners/operators of Treatment, Storage and Disposal Facilities (TSDF) to the Compliance Manager or CM.
- c) Initiate and complete the entries into the manifest tracking database to track the flow of manifests from initiation to final destination. Perform manifest filing as required.
- d) Obtain and post the required copies of manifests to the State of California Department of Toxic Substance Control.
- e) Maintain a stock of blank manifests on hand to fulfill CSW manifesting requirements.
- f) Adhere to the requirements of this SOP, submitting proposed changes or revisions to the CM as necessary.
- g) Maintain a secure filing system for UHWMs and Land Disposal Restriction Notifications. Ensure that the files are organized to accommodate quick search capabilities. Maintain all copies indefinitely. (EPA retention 3 years; DOT retention 3 years unlike HM which is 2 years)

### **6.5 CSW Compliance/QC Manager (Compliance Manager)**

- a) Resolve questions regarding the manifest tracking requirements of this SOP by communicating with federal, state and local regulatory agencies, transporters and owners/operators of Treatment, Storage and Disposal Facilities (TSDF), as required regarding manifesting concerns. Brief CM as necessary to ensure communication with outside parties is authorized at the appropriate level.

- b) Randomly audit manifests pre-use for compliance, audit completed manifests prior to submittal to DTSC, monitor preparation, tracking, and filing operations periodically to ensure compliance with this SOP and references (a), (b) and (c).
- c) Assist in the preparation, review, authorization and distribution of Manifest Correction Letters, Manifest Exception Reports, Manifest Discrepancy reporting and Un-manifested Waste Reports.

#### **6.6 CSW Profile Specialist (Profile Specialist)**

- a) Assists in the review or creation of waste determinations, profiles and LDRs in preparation for shipment of hazardous waste.
- b) Participates as the manifest files expert in regulatory agency inspections and environmental compliance evaluations, as necessary, to provide requested manifest copies and to describe the filing system.

### **7.0 PROCEDURES**

#### **7.1 Obtaining Service**

HWF clients can obtain manifesting services, Monday through Friday, from 0730-1600, by calling (619)545-6520. There may be an additional charge for this service for non-Navy organizations as authorized by the DGR. Off-base manifesting will not be scheduled after 1400. If there is a manifest service request, the Manifest Data Sheet (Enclosure 13) should be provided to the person requesting service for completion. The Manifest Data Sheet will be used to record the below information and shall be retained with the manifest for filing.

- a) Contract, task order or job order number (JON) the service will be billed to
- b) Name and contact information of the person requesting manifest
- c) If the waste is generated by a contractor, the name of the contracting officer and phone number, the name of the prime contractor and contract manager.
- d) Location of the waste
- e) Name of generating activity and activity code and EPA ID#
- f) Name, address, EPA ID#, and facility phone# of the designated TSDF.
- g) Name and EPA ID# of the transporter(s).
- h) Waste determination or waste profile information.
- i) Who is responsible for generating the manifest and LDR form?
- j) Place and time of shipment.

#### **7.2 Pre-Manifest Requirements**

Manifest requests are normally received from government contractors, staff civil engineering offices, FEAD (Facilities Engineering & Acquisition Division) offices or the Contracting office. Manifesting requests from government contractors must be approved, in writing, by the applicable government contracting office.

- a. Upon receipt of a request, the Profile Specialist determines if the requester has manifesting authority (refer to Enclosure 1). If not, the requestor is directed to the proper

- manifesting authority. Notify appropriate Navy Asbestos Program Representative of pending asbestos shipments.
- b. Verify funding is available for the JON.
  - c. If the manifesting services are being requested for bulk pumping then a Waste Acceptance Form must be initiated (Enclosure 2) for waste destined to the Industrial and Oily Waste Treatment Plant.
  - d. Verify the names and EPA ID#s of the Generator, Transporter and TSDf. If the EPA ID#s are not found in Enclosure 1, get assistance from the Compliance Manager to verify them.
  - e. Verify waste determination with profile information.
  - f. Assign the most appropriate CSW profile number(s) to the waste ensuring that the all the aspects of the profile are consistent. If a profile does not exist, work with the Profile Specialist to create one. Record that/those profile numbers on the Manifest Data Sheet.
  - g. A UHWM (Enclosure 3) is initiated in accordance with this SOP and references (a), (b) and (c).
  - h. When preparing manifests, the name of the actual waste generating activity and location (building number or street address) must be included in Box #5 under Generator's site address.
  - i. The following address is used in Block #5 under Generator's name and mailing address if the Service Provider is the manager of the EPA ID number.

**Commander, Navy Region SW**

**P.O. Box 181470**

**Coronado, CA 92178-1470**

**619-545-6520**

- o For waste transported by the Service Provider:
- j. Block 6 (left) reads: **Clean Harbors Environmental Services, Inc.**
- k. Block 6 (right) reads: **MAD039322250**
- l. Emergency Contact: **619-545-6520** (used for transport issues beginning and ending same day during normal working hours).
- m. Emergency Contact: **800-483-3718** (for transport before or after normal working hours, response must be coordinated with the CM in advance).
  - o For Navy Facilities receiving the waste, generator name should read:
- n. NASNI HW Facility Complex or NBSD HW Facility Complex
- o. Block 13 of all UHWMs must contain federal (as appropriate) and state waste codes to describe each waste stream (up to six). State waste codes are not to be redundant with federal waste codes.
- p. Title 22 Part 66268 and 40 CFR Part 268 describe written notifications generators, transporters and TSDf's are required to communicate about the land disposal restrictions

(LDR) which apply to the waste they ship. The generator or TSDF is required to determine if the waste can be landfilled without additional treatment, what treatment standards must be met and if there is a specific treatment technology required for the waste. In general, a one-time notification is required with copies maintained by both the generator and TSDF. If the waste or TSDF change, a new notification must be sent and maintained. Enclosure 12 contains additional clarification and direction on how to complete or review the LDR form. The LDR must comply with references (b) and (c). The shipment of a new waste stream necessitates a LDR with the first shipment. The regulations have changed significantly over time. Please contact the Profile Specialist with questions about how to properly complete an LDR. The person signing the manifest cannot assume an LDR already exists and must check before the manifest is signed.

### **7.3 Manifesting Process**

(Enclosure 8), "Completing the Manifest", describes the specific tasks to complete the UHWM. Where the Service Provider does not complete the manifest, this enclosure can be used to guide the review of the manifest prior to signature.

### **7.4 Actions at the Time of Shipment Prior to Signing the Manifest (document on CSW-094 Enclosure 14)**

- a) Inspect the driver's license to ensure it is current and has a hazardous materials endorsement (H or X).
- b) Inspect the DOT medical certificate to ensure it is current.
- c) Ensure the generator, transporter and TSDF EPA ID #s are valid (see Enclosure 1).
- d) Ensure the transporter has a current California DMV Motor Carrier Permit (if required), State of California Hazardous Materials Transportation License (if required) , Department of Toxic Substances Control Hazardous Waste Transporter Registration, US DOT Hazardous Materials Certificate of Registration (if required), a Hazardous Materials Safety Permit (if required) , and Certificate of Liability Insurance.
- e) Ensure the vehicle and container(s) conform to the applicable DOT regulations. (i.e. power unit must be lockable and driver must have two-way communications).
- f) For any waste streams not already verified, review the profiles (see Enclosure 7 for example) and lab analyses to ensure proper waste determination. For containerized waste shipped in cubic yards, put an estimated weight in block #14 of the manifest.
- g) If the HW pick-up requires bulk pumping, a Waste Acceptance Form must be completed. (See Enclosure 2)
- h) After the waste is loaded, it must be inspected to ensure proper segregation and the containers are secure IAW reference (a).
- i) Verify that the container count; container marking, labeling and the manifest(s) are the same.
- j) Any discrepancies observed during the inspection must be resolved prior to signing the manifest.

- k) If the waste will be transported by the Service Provider, follow SOP HW-05-003 or HW-05-004.
- l) Document the pre-transport inspection at the time of shipment before signing the manifest using (Enclosure 14).

## 7.5 Manifest Distribution at the Time of Shipment

- a) The Service Provider manages the EPA ID#, is the transporter and manages the TSDF (Enclosure 1).
  - The driver will sign the manifest (if authorized) as the generator and the transporter.
  - The driver will sign the LDR (if appropriate and authorized).
  - The driver will provide a photocopy of the manifest to the local environmental officer and will take all copies of the original manifest and transport the waste to the designated TSDF.
  - A legible copy of the "Generator initial copy" is delivered to NBC building 1606 within 48 hours.
- b) The Service Provider does not manage the EPA ID #, but is the transporter and TSDF (Enclosure 1).
  - The driver will sign the manifest (if authorized) as the transporter.
  - The "Generator initial copy" will be left at the local environmental office and the driver will take the remaining manifest copies with the waste to the TSDF.
- c) The Service Provider manages the EPA ID#, but is not the transporter or TSDF (Enclosure 1).
  - The Service Provider employee will sign the manifest and LDR as the generator (if authorized).
  - The Service Provider employee will provide a legible copy of the "Generator initial copy" to NBC building 1606 within 48 hours. The manifest data sheet and the Land Disposal Restriction Notification, if applicable, and copies of analyses must be filed with the manifest
  - The remaining copies are given to the driver.
- d) If the shipment is not as described above, the Service Provider employee will discuss proper procedure with the CM prior to manifest signature.

## 7.6 Manifest Distribution After Shipment

The distribution of manifests depends largely on the role that the Service Provider plays in the generation, transportation, and disposal of the subject HW. The Manifest Flow Chart (Enclosure 11) describes how manifests are handled after shipment has started.

- a) The Record Keeper ensures the manifest has been filled out completely, including the Hazardous Waste Report Management Method Codes (Enclosure 10) in box 19 and enters the manifest information on the Manifest Tracking Log (Enclosure 9).

- b) Manifests will be reviewed by designated personnel prior to distribution and filing. Discrepancies are directed to the Compliance Manager or CM for resolution prior to distribution and filing. Wastes reported in Y (yards), although regulatory compliant, are preferred in P (pounds) to facilitate more accurate reporting; follow-up weight is permissible.
- c) The Record Keeper records the subsequent filing and distribution status for each manifest on the Manifest Tracking Log. Enclosure 9 shows an example of how the data is organized.
- Manifest # Manifest Tracking Number in block 4 of the manifest
  - Date Signed Generator's/Offeror's Signature Date in block 15
  - Date Declared Designated Facility Signature Date in block 20
  - Location Notes Description of manifest distribution
- d) The Generator Initial manifest copy is maintained in a three-ring binder organized by date of shipment until the TSDf returned copy is received. The Record Keeper matches the TSDf returned copy to the Generator initial copy and files them together in the completed manifest file cabinet. Completed manifests are filed in the manifest file cabinet in folders by month and EPA ID#.
- e) The Record Keeper reviews the three-ring binder with Generator initial copies of manifests, weekly, to ensure the TSDf returned copies are received within 30 days. If not, (see 7.8 Exception Reports) the Record Keeper calls the receiving TSDf after 30 days (Keep a written record of attempt to reconcile.) and notifies the Compliance/QC Manager. If not received within 40 days, the Compliance/QC Manager is notified again. An exception report (Enclosure 5) is written to the DTSC if not received within 45 days. This document is reviewed by the DGR and the Appropriate Base Environmental Office.
- f) Waste shipments into and out of HWF's are entered in the EWBATTS database by the Record Keeper.
- g) File manifest and related paperwork according to SOP HW-15-037 Retention of Waste Management Documents.

## 7.7 Correction Letters

- a) Significant discrepancies are differences in quantity or type of HW designated on the manifest, and the quantity or type of HW a facility actually receives; either must be noted on the manifest
- b) Significant discrepancies in quantity are variations greater than 10% in weight for bulk waste and any variation in piece count for containerized shipments.
- c) Significant discrepancies in waste type are obvious differences, which can be discovered by visual inspection or waste analysis, such as solvent substituted for acid, or toxic constituents not reported on the manifest.
- d) Other discrepancies (such as improper EPA ID number, missing signatures, incorrect dates, etc.) that appear on a manifest must be corrected before the manifest is considered complete.

- e) Upon discovery of a significant or other discrepancy, an attempt shall be made to reconcile it by telephone or written correspondence with the generator, transporter, or TSDF as applicable. Corrections to manifests following the shipment must be corrected on all copies. When a manifest is corrected after shipment for "other" discrepancies, the authorized correction is initialed; for "significant" discrepancies, documentation describing who was contacted and how the discrepancy was resolved is maintained with the manifest. If the discrepancy has not been corrected prior to distribution of one of the copies to DTSC, a Manifest Correction Letter (Enclosure 4) shall be sent to the DTSC describing the discrepancy and attempts to reconcile it. Copies of Correction Letters are filed with the manifests.
- f) Upon discovering a discrepancy involving a HW of concern, as defined in Title 22, §66261.111(a), if the waste at issue represents a reportable quantity or a reportable difference in type, as specified in §6626.111(b) and (c), the Service Provider shall attempt to reconcile the issue with the generator or transporter. If the issue is not reconciled within 24 hours, after discovery, the Service Provider shall immediately notify the DGR and CNRSW Environmental and the DTSC will be notified by calling 1-800-698-6942 and providing the following information:
- Facility name and EPA ID number
  - Generator name and EPA ID number
  - Transporter name, EPA ID number and registration number
  - Manifest number, information from line 9, 10, 11, 12 and 13 of the manifest (including proper shipping name, hazard class, identification number, packing group, number of containers, container type, quantity or volume at issue, weight or volume units, and waste codes)
  - If missing, the potential location or transportation routes where the HW of concern may have gone missing.
- g) The Base Environmental Office must review all Service Provider drafted agency correspondence. Copies are provided to the DGR and concerned persons as appropriate.

## **7.8 Exception Reports**

- a) If the Navy is the generator of the manifested HW and does not receive a copy of the manifest with the hand written signature of the owner or operator of the designated facility within 30 days of the date the waste was accepted by the initial transporter, the Service Provider shall contact the transporter and/or the designated TSDF to determine the status of the HW. (Keep a written record of attempt to reconcile.)
- b) If 45 days pass from the date the original transporter accepted the HW, and the Service Provider has not received a copy of the manifest with the handwritten signature of the owner/operator of the designated TSDF, an Exception Report shall be submitted to DTSC

through the Base Environmental Office. Copies of Exception Reports shall be kept on file in the HWF Office. The Exception Report (Enclosure 5) shall include:

- A legible copy of the manifest for which the generator does not have confirmation of delivery.
  - A cover letter signed by the designated representative that explains the efforts taken to locate the signed HW manifest copy and the results.
- c) The Base Environmental Office must review the Service Provider drafted Exception Report and a copy must be provided to the DGR.

#### **7.9 Un-manifested Waste Report**

- a) If off-site waste is received at the TSDF without a manifest, an “Un-manifested Waste Report” must be prepared in accordance with Title 22 CCR, §66264.76.
- b) The Base Environmental Office must review the Service Provider drafted Report and a copy must be provided to the DGR.

#### **7.10 Training Requirements**

- a) The tasks related to preparing HW manifests and efficiently managing a manifesting service, requires a great deal of knowledge and skill. A working knowledge of federal and state regulations regarding the transportation and handling of HW, as well as local policies and practices is essential to be an effective manifestor. In addition, knowledge and experience in subjects such as HW identification and management, government contract management, correspondence preparation, Occupational Safety and Health issues, and HWF Permits are necessary.
- b) The following are the minimum requirements that must be completed by employees assigned to manifesting duties:
- Occupational Safety and Health training which meets the requirements of 29 CFR 1910.120. (24-hour initial and 8 hour annual refresher).
  - Basic manifest training includes: 49 CFR §172.704 initial HAZMAT Employee & recurrent training every three years; 40 CFR and Title 22 CCR requirements with annual refresher training.
  - HWF operations – permit restrictions and requirements.
- c) Regardless of training and experience, personnel must be explicitly authorized to sign manifests on behalf of CNRSW per section 7.11 before doing so.

#### **7.11 Manifest Signature Requirements**

- a) UHWMs are prepared and signed by the generators of the HW or a designated representative. Command Navy Region South West (CNRSW) has given authority to the Service Provider for signing and managing of manifests.
- b) When signing manifests, the signer is acting on behalf of the Commanding Officer. With that in mind, and in accordance with reference (d), each HW generator signatory must be

authorized in writing by the installation commander or Permit holder, as appropriate. A complete list of authorized persons is on the contractor's portal.

c) In order to receive a signatory authorization from the Commanding Officer, the following steps must be taken:

- Complete manifest training
- Supervisors prepare and submit a written request for signatory authorization. Include in the request a statement that the prospective manifestor has completed all required training and is recommended to receive the signatory authorization.

## 8.0 Temporary EPA ID# Acquisition

It may be necessary for Service Provider personnel to acquire a temporary EPA ID # for an off base generator. These occurrences are one time events and the temporary ID # will allow for the movement of a certain amount of waste. The Profile Specialist is the preferred lead on obtaining Temp EPA ID numbers. The following steps must be followed:

- Go to website: <https://dtsc-web01.dtsc.ca.gov/epaid/default.aspx>
- Enter e-mail address at the bottom of the page
- Click on the link in the new e-mail
- For Navy waste, select "Generator" option
- Fill out the first form as follows:
  - Generator Name: Commander, Navy Region SW
  - Federal Employer ID: 34-0727612
  - BOE Number: *<leave blank>*
  - SIC Code: 9711 – National Security
  - Enter the physical location of the waste in the remaining fields
- Click "Next"
- Fill out the second form as follows:
  - Mailing Information:
    - P.O. Box 181470
    - Coronado, CA
    - 92178-1470
  - Contact Information
    - DGR\*
    - 1220 Pacific Highway
    - Building 110
    - San Diego, CA
    - 92132
  - Owner Information (click on "Copy from Mailing"):
    - Commander, Navy Region SW
    - P.O. Box 181470
    - Coronado, CA
    - 92178-1470
    - 6195324954

- Click “Submit Site Data”

\* DGR – Designated Government Representative

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# STANDARD OPERATING PROCEDURE

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**Subject:** Spill Clean Up Procedure

**References:** (a) Code of Federal Regulations, Title 49 CFR 172.700  
(b) Code of Federal Regulations, Title 29 CFR 1910.120; .134 and .151

**Enclosures:** (1) CSW-028 (Spill Response Form)  
(2) CSW-029 (Instructions for Completing the Spill Response Form)

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## 1. PURPOSE

The purpose of this procedure is to establish a standardized procedure for responding to hazardous substance spills or requests to pick up abandoned hazardous materials or waste during normal working hours (M-F 7:30-16:00).

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. The federal facilities supported by the Service Provider conduct many ground and maintenance operations utilizing hazardous materials. In addition, hazardous materials/wastes are regularly transported to and from these federal facilities. Although unlikely, it is possible for an accidental release to occur while handling or transporting hazardous materials/wastes.

## 3. SCOPE

This procedure defines the steps to be taken in the event Service Provider personnel must respond to an accidental release. The Federal Fire Department is the first responder to all accidental releases. Federal Fire personnel will identify and contain the spilled substance. Service Provider personnel act as the second responder and will commence clean up efforts as directed. It is the responsibility of Base Environmental &/or the customer to determine when cleanup requirements are met.

## 4. ACTION

This document applies to all Service Provider personnel, who are responding to spill clean-ups in the San Diego area.

## 5. DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste

- c) **Customer** – the Navy group or Navy subcontractor who has the waste and has a proper Job Order Number with funding set up with the Navy Residual Organization.
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- f) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.

## 6. RESPONSIBILITIES

### 6.1 Spill Response Personnel

- a) Maintain personal spill equipment bag.
- b) Have cell phone accessible.
- c) Be familiar with and known location of this SOP.
- d) Limited to cleaning up operations requiring no higher than Level C PPE.

### 6.2 HWF Supervisor (Supervisor)

- a) Verifies if the spill is contained or poses a health or safety threat.
- b) Makes sure Federal Fire (9-911) and the CDO has been contacted if either party is not the reporting agency.
- c) Ensures that all employees meet the training requirements outlined in Ref. (a).
- d) Maintains this SOP is in a central location at their HWF.
- e) Replenishes equipment for spill equipment bags.
- f) Ensures that each emergency response vehicle is maintained in accordance with SOP HW-05-008.

### 6.3 CSW Manager (CM)

- a) Takes requests for spill clean-ups and contacts the appropriate parties.
- b) Evaluates the spill and verifies the waste identification.
- c) Determines the safest and most efficient method to clean up the spill, appropriate containerization, and the proper paperwork to be used for safe and legal transport of the waste generated.
- d) Verifies that there is a valid Job Order Number with funding and will notify the Navy Residual Organization when a cleanup will exceed \$1,000.00
- e) Determines the appropriate PPE to be worn based on spill information provided.

## 7. PROCEDURES

### 7.1 Spill Clean Up During Normal Working Hours

Upon request, the Service Provider will respond to clean up hazardous substance releases during normal working hours. The following procedures will apply:

- a) Requests for spill clean-up will be taken from Federal Fire, the base Command Duty Officer (CDO), or the CM. Requests will not be taken from personnel at the spilling activity. Part 1 of

- the Hazardous Waste Spill Report (Enclosure 1) will be completed by the service provider employee receiving the request. Refer to Enclosure 2 for instructions on completing the Hazardous Waste Spill Report. The request and Spill Report will be routed to the appropriate Supervisor at Naval Station, North Island, Naval Amphibious or Submarine Base.
- b) The Supervisor will verify if the spill is contained or poses a health or safety threat. If the spill is not contained or poses a health or safety threat and Federal Fire has not yet been contacted, the command representative will be instructed to call Federal Fire (9-911).
  - c) The CM or Supervisor will ensure there is a valid Job Order Number with funding. If the spill will exceed \$1,000.00, the Navy Residual Organization will be contacted and approval obtained prior to continuing.
  - d) The Supervisor will determine what the initial appropriate response shall be based on the information provided to him or her by the reporting activity.
  - e) Service Provider personnel are limited to clean up operations requiring no higher than Level C Personal Protective Equipment (PPE).
  - f) The Service Provider will respond to spills, which occur during normal working hours within one hour of being notified of the occurrence. It is the responsibility of the Navy Environmental group &/or the customer to determine when cleanup is complete and satisfactory.

## 7.2 Clean Up Operations

During all clean up operations, the safety of personnel shall be considered the first priority. The following guidelines will be followed when responding to all hazardous substance spills.

- a) Federal Fire is the first responder for all spills. The Service Provider will respond when requested, to hazardous substance releases on all Naval Bases located in the San Diego area when authorized by Federal Fire, the base CDO, or other authorized personnel.
- b) In all cases, the Service Provider will not start clean up of the spill until Federal Fire or the Program Manager has determined it is safe to do. Federal Fire or the authorized command personnel must provide to the Service Provider, the identification of the spilled material and authorize the Service Provider to proceed with the clean up. If the spill substance is not identified, Service Provider personnel will not commence clean up until the unknown substance is identified.
- c) The CM will determine the appropriate PPE to be worn based on the information provided. Service Provider personnel are limited to clean up operations requiring no higher than Level C PPE. In all cases the CM is to consider personnel safety above all other requirements. If the CM is not satisfied with the information provided by persons on scene, or the first responder has not addressed all concerns about the spill, clean up efforts will not begin until the concerns are met.
- d) The CM will evaluate the spill and verify the waste identification, determine the safest and most efficient method to clean up the spill, package the spill clean up waste into the

appropriate packaging, and determine the proper paperwork to be used for safe and legal transport of the waste generated.

- e) The supervisor must complete Parts 2-4 of the Hazardous Waste Spill Report and submit to the CSW Manager upon completion. The CSW Manager will then submit the completed Spill Report to the Designated Government Representative within 48 hours.
- f) The CM will notify and get approval from the Navy CDO, Regional Representative or other authorized Navy representative at the spill when the spill cleanup will exceed \$1,000.00 before proceeding.
- g) The RO must be notified of the spill and provided details of the clean up no later than the completion of the spill clean up.
- h) The Navy Environmental group &/or customer will determine when cleanup is complete.

### 7.3 Resources

Each Supervisor and each HWF employee will be provided the necessary tools, equipment and support required to successfully respond to a spill clean up. The personnel shall ensure they have the following tools and resources at their disposal.

- a) Emergency personal and agency contact telephone numbers.
- b) A cell phone.
- c) A personal spill equipment bag containing the necessary tools and equipment needed to respond to a spill.
- d) Know location of this SOP for reference.

**Note: Responding to mercury releases in excess of ½ pound (approximately one tablespoon) requires corporate approval.**

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# STANDARD OPERATING PROCEDURE

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**Subject:** Facility and Vehicle Inspections

**References:**

- (a) Code of Federal Regulations, Title 40
- (b) California Code of Regulations, Title 22
- (c) Hazardous Waste Facility Permits (NBSD/NASNI)
- (d) Code of Federal Regulations, Title 49 CFR Parts 396.11 & 396.13
- (e) Title 13 CCR
- (f) DMV California Commercial Driver Handbook
- (g) DOD 4145.19-R-1

**Enclosures:**

- (1) CSW-030 (Daily 90-Day Inspection Form)
- (2) CSW-031 (Daily TSDF Inspection Form)
- (3) CSW-032 (Weekly 90-Day Inspection Form)
- (4) CSW-033 (Weekly TSDF Inspection Form)
- (5) CSW-034 (Monthly 90-Day Inspection Form)
- (6) CSW-035 (Monthly TSDF Inspection Form)
- (7) CSW-036 (Forklift Operator's Pre-Operation Inspection Checklist)
- (8) CSW-037 (Driver Vehicle Inspection Report – CMV)
- (9) CSW-037b (Driver Vehicle Inspection Report – Light Duty)

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## 1. PURPOSE

The purpose of this procedure is to establish the requirements to perform facility and vehicle inspections.

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (CST) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

Facility, equipment, and vehicles used to provide the specified services must be maintained in optimum condition at all times in order to adequately protect personnel, prevent possible unauthorized releases to the environment, and comply with existing statutes, regulations, and policies. References (a) through (c) address requirements for facility related inspection requirements and references (c) through (g) address vehicle inspection requirements. This document provides local guidance and direction to accomplish the requirements listed in the references.

### 3. SCOPE

This procedure defines the steps to perform and document inspections related to facilities, operational and emergency equipment, and vehicles. This procedure provides guidance to Service Provider personnel.

### 4. ACTION

This document applies to all Service Provider personnel who are performing facility and vehicle inspections.

### 5. DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **NBCNI** – is the Naval Base Coronado North Island
- d) **NBSD** – is the Naval Base San Diego
- e) **NBPL** – is the Naval Base Point Loma
- f) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.

### 6. RESPONSIBILITIES

#### 6.1 HWF Supervisor (Supervisor)

- a) Ensures all items listed on enclosed inspection forms are inspected IAW this SOP and the results are accurately annotated.
- b) Verifies that all drivers/operators have the proper license with endorsement for each vehicle being operated.
- c) Ensures that all inspection reports are kept at the facility for a minimum of three years.

### 7.0 PROCEDURES

The Supervisor will ensure all items listed on (Enclosures 1 through 10) are inspected and the results accurately annotated.

#### 7.1 Facility Inspection Form Completion

Complete the top portion of the appropriate Inspection Form (Enclosures 1 - 6) by checking the appropriate block indicating the inspection location (e.g., NBCNI, NBSD, etc.), listing the date and time of inspection, and printing the name (first and last) of the inspector. The column labeled "INSPECTION AREA" lists the different general areas and items to be inspected.

- a) In the column labeled Yes/No, assess the general condition of each area/item being inspected. If the item is judged to be satisfactory, mark the appropriate box with a "Y". If the item inspected is discrepant, mark the appropriate box with an "N".
- b) In the column labeled DEFICIENCY, briefly describe the reason an "N" was placed in the "Yes/No" column. Leave this column blank if there is a "Y" in the "Yes/No" column.
- c) In the column labeled REPAIR/REMEDY, describe the method used to correct the unsatisfactory condition.
- d) In the column labeled REPAIR DATE, write the date of the deficiency was actually corrected.

- e) In the column labeled VERIFIED BY, write (print) the last name and sign the initials of the person who verified the discrepancy was corrected.

**NOTE: Discrepancies affecting the safety of personnel or which, if not remedied, would result in a statutory/regulatory violation of an environmental threat, must be reported to the CM and corrected immediately.**

## 7.2 Daily Inspections

The Supervisor will ensure the following areas are inspected daily (use Enclosures 1 and 2 to record results). If the daily inspection was delegated, the Supervisor will verify the results and sign the acknowledgement at the bottom of the inspection form.

- a) HEADING: Annotate the facility being inspected by checking the appropriate block (NBSD, NBCNI CST-1, NBCNI CST-2, NAB or NBPL). Fill in the blanks for Date, Time, and the Name of the person conducting the inspection.
- b) LOADING/UNLOADING AND CONSOLIDATION AREAS: Check the area for spillage of hazardous waste, block access and for unsealed cracks, holes, or chips in the deck.
- c) STORED WASTE CONTAINERS: Inspect containers for damage; including dents, holes, severe corrosion, or bulges. Ensure the lids and bungs are securely in place. Ensure each container is properly labeled and have been marked with appropriate inventory tracking information. Ensure containers have been stored to ensure chemical compatibility should a leak occur. The site conforms to other site specific requirements for waste tracking, storage location, capacity and maximum time limits.
- d) PALLETS: Inspect pallets for dry rot, missing fasteners, split or broken slats, inspect metal pallets for severe corrosion or deteriorated welds. Inspect all pallets for hazardous waste residue, which may be an indication or a leaking container.
- e) aisle SPACE: For permitted facilities, ensure the aisle space complies with the requirements of each permit (three feet). For non-permitted facilities, ensure the aisle space is no less than two feet. Also inspect to ensure the aisles are not blocked and "Emergency Exits" are easily identifiable and accessible.
- f) SPILL CONTAINMENT: In accordance with 66264.175(b), inspect berms, sumps, trenches, and other containment for unsealed cracks or gaps in the side walls or decks. Ensure the containment equipment is free of standing liquid and in good repair. The Supervisor is notified if storm water has accumulated in the containment area and the Supervisor will ensure it is removed within 24 hours and managed in accordance with the Storm Water Management Plan. Evidence of any other release will be immediately reported to the Supervisor and CM. The Supervisor will identify the material released and ensure proper PPE and equipment is used to remove it from the containment area.

If the material is hazardous waste, it will be managed in accordance with Title 22 Chapters 12 through 16.

- g) COMMUNICATIONS EQUIPMENT: Test all telephones and two-way radios for proper operation. Ensure all the required equipment is available for use and is in good repair. Ensure accesses to fire and hazard alarms are not blocked.
- h) SAFETY SHOWERS/EYEWASH STATIONS: Inspect safety showers and eyewash stations for easy access. Ensure required signs are posted and clearly visible.
- i) SPILL CONTROL EQUIPMENT & SUPPLIES: The site has adequate spill control equipment and supplies.
- j) ODORS AND FUMES: While performing daily inspections, be alert for unusual odors or fumes.
- k) STORAGE IN CLOSED HAZARDOUS WASTE MANAGEMENT UNITS: Inspect facilities that are undergoing formal environmental closure or are subject to post-closure care (old hazardous waste storage facilities waste piles, surface impoundments, etc.) for unauthorized storage of waste or material.
- l) DRUM INVENTORY(NBCNI CST-1, CST-2 & NBSD 1-year CST only): The storage limits for each permitted HWF are as follows:

NBCNI CST – 1: Total 1,160: 840 - 55 gal drums or equivalent (inside), 320 - 55 gal drums or equivalent (outside cage)

NBCNI CST – 2: 2,380 - 55 gal drums or equivalent (inside)

NBSD 1-year: 972 – 55 gal drums or equivalent (inside).

All waste will be placed on pallets, with a maximum of 3 - 55 gal drums or equivalent per pallet. Waste will be stacked no more than 2 pallets high. At no time will permit mandated storage requirements (aisle space, placement, containment capacity, and stacking requirements) be compromised to allow storage space for equipment or other non permit-regulated items.

- CONTAINER STORAGE LIMITS: The container storage limits for each facility are as follows:
  - NBCNI CST-1 & CST-2: 1 year permitted TSDF
  - NBCNI OS1 & OS2: 90 day storage area
  - NBSD CST: 1 year permitted TSDF
  - NBSD BAY 10 & 11: 90 day storage area
  - NBPL HW FACILITY: 90 day storage facility
  - NAB HW FACILITY: 90 day storage facility

-At NAB and NBPL 90 day storage areas, any containers within 15 days of expiration must be notated on the daily inspection form (Enclosure 1) in the column, "Are there any containers that exceed 75 days in storage."

-At NBCNI OS1, OS2, and NBSD 90 day storage areas(bay 10 and 11), any containers that are within 5 days of expiration must be notated on the daily inspection form (Enclosure 1) in the column, "Are there any containers that exceed 85 days in storage."

-At NBCNI CST-1, CST-2, and NBSD 1 CST, any containers within 60 days of expiring must be notated on the daily inspection form (Enclosure 2) in the column, "Are there any containers that exceed 305 days in storage."

Anytime the above referenced columns on the daily inspection forms are answered with a deficiency the supervisor must submit an email to the Compliance Manager that contains the following information for every container that exceeds the facilities identified storage limitations: Drum #, Accumulation Start Date(ASD), Profile #, DO #(if applicable), Scheduled Ship Date(if applicable). This email must be printed and filed with the corresponding daily inspection form. Containers that are within 15 days of expiring at NBPL and NAB that are not already scheduled to be shipped offsite, must immediately have arrangements made for the containers to be shipped to NBCNI CST-1, CST-2, or NBSD CST. Containers within 5 days of expiring at NBCNI OS1, OS2, and NBSD 90 day storage area should be moved into the TSDF within 2 days of being documented. Containers that exceed 305 days in storage at NBCNI CST-1, CST-2, and NBSD CST should have a 1348 prepared to be included on the next Delivery Order for shipment offsite. (refer to HW-05-031).

### 7.3 Weekly Inspections

- 1) The Supervisor will ensure the following areas and equipment are inspected weekly (use Enclosures 3 and 4 to record results).
  - a) HEADING Annotate the facility being inspected by checking the appropriate block (NBSD, NBCNI CST-1, NBCNI CST-2, NAB or NBPL). Fill in the blanks for Date, Time, and the Name of the person conducting the inspection.
  - b) EMERGENCY SUPPLIES: Inspect all personal protective and general emergency equipment to ensure serviceability. Check for cracks, holes, rips, tears, cuts, broken fasteners, deterioration, sufficient quantities and expired shelf life. Typical items include:
    - Air Purifying Respirators and Cartridges
    - Chemical Splash Masks and Goggles
    - Over boots, Gloves and Body Coverings
    - Recovery Drums

- Absorbents/neutralizing agents
  - First Aid Kits
  - Tools (brooms, shovels, squeegee)
  - Test kits (Clor-D-Tect, Hydroclor-Q, pH)
- c) FIRE EXTINGUISHERS: Ensure all fire extinguishers are of the required types, in their proper location, not blocked, contain the proper signs, and adequately charged.
- d) SAFETY SHOWERS/EYEWASH STATIONS: Inspect safety showers and eyewash stations for easy access. Activate each system to ensure proper operation.
- e) LIGHTING EQUIPMENT: Ensure all lighting is functional and adequate for the required work schedule.
- f) FACILITY SECURITY: Ensure all doors are operable and locks are in working order. Check for broken windows and window locks. Walk the facility fence-line to ensure the fence fabric is in tact. Ensure all gate locks and locking hardware are in good working order.
- g) SIGNS: Check all warning signs (HAZARDOUS WASTE AREA, NO SMOKING, CAUTION, etc.) to ensure they are present, properly attached and visible.
- h) Chemical Handling Equipment: Ensure all chemical handling equipment including drum dollies, pallet jacks and drum grabbers are in good condition.
- i) Facility Utilities: Ensure facility utilities including electric, gas, water and ventilation are in good working order.
- j) Recycle Bins: Recycle bins are inspected for free liquids, hazardous waste labels, solid residues, ensure all containers are open and either cut, punctured, or crushed and drained.

#### 7.4 Monthly Inspections

The Supervisor will ensure the following areas and equipment are inspected Monthly (use Enclosures 5 and 6 to record results).

- a) HEADING: Annotate the facility being inspected by checking the appropriate block (NBSD, NBCNI CST-1, NBCNI CST-2, NAB or NBPL). Fill in the blanks for Date, Time, and the Name of the person conducting the inspection.
- b) FACILITY: Inspect the general condition of facility for the following:
- Deteriorating paint on the walls and flooring.
  - Physical damage to the structure
  - Openings in the roof or doors that could cause leaks.
  - Proper operation of electromechanical doors.
  - Growth of vegetation in containment and storm water drainage areas.
  - Condition and accuracy of signage.
- c) FIRE ALARMS: Inspect fire alarms for accessibility and proper markings.

- d) FIRE EXTINGUISHERS: Perform a visual inspection of the extinguisher's casing, hose, nozzle and pressure gauge. Check for cracks, breaks, deterioration, low pressure, and missing seal. If discrepancies are discovered, replace the extinguisher or consult local fire prevention authority or safety personnel for appropriate repair procedures. Annotate monthly inspections on the fire extinguisher's INSPECTION RECORD.
- e) SPILL CONTINGENCY PLAN OR BUSINESS PLAN: Review each plan to ensure information is accurate and up-to-date. If errors are discovered, immediately notify the CM (changes to spill contingency plans or business plans may require permit modifications or other regulatory agency involvement). Ensure the plans are conspicuously posted and easily accessible by all employees.
- f) AUTOMATIC FIRE SPRINKLER SYSTEMS: If the site is equipped with a sprinkler system, observe the last date the system was inspected by a qualified vendor. These are due every five years. Inspect each sprinkler nozzle to ensure it is in good condition.

## 7.5 Vehicle Inspections

- a) VEHICLES TO BE INSPECTED: The Supervisor will ensure all vehicles, including forklifts, are inspected, using Driver Vehicle Inspection Reports (DVIR) (Enclosures 7 - 9) prior to each day's work on each vehicle operated in accordance with 49 CFR 396.11 and company policy.
- b) ITEMS TO BE CHECKED: Vehicle operators must ensure vehicle registration and odometer information is properly recorded on each inspection checklist. The following general areas are inspected for each vehicle:
  - Leaks
  - Fuel levels
  - Belt/hose condition
  - Battery corrosion
  - Tire condition, wheels, and rims
  - Cleanliness
  - Emergency/Safety equipment (fire extinguisher, warning devices, first aid kits, etc.)
  - Controls, equipment settings, and instruments
  - Steering
  - Windshield wipers
  - Brakes, including parking brake
  - Lighting devices and reflectors
  - Horn
  - Rear vision mirrors
  - License plates, registration, and permits

- c) MARKING THE FORMS: Check any defective item with an X and provide details in the remarks section. All defects or deficiencies are to be brought to the Supervisor's attention when they are noted so it may be determined if the vehicle is safe to operate.
- d) TURNING THE FORMS IN: Leave a copy of today's DVIR in the vehicle for the next driver and turn in the remaining copies. Before driving a motor vehicle, the driver shall review the copy of the last DVIR left by the previous driver to learn if the previous driver noted defects or deficiencies and to confirm with the Supervisor that any issues have been resolved before operating the vehicle. Copies of the DVIRs with deficiencies are maintained in the Vehicle Maintenance Folder. All other DVIRs are only maintained for 90 days.

#### **7.6 Other Periodic Inspections and Calibrations**

- a) Scale certification/calibration is done quarterly by a scale service vendor
- b) Forklifts are serviced quarterly by an industrial equipment vendor
- c) Torque wrenches are replaced annually rather than being calibrated due to cost effectiveness
- d) Washers discharge pipes are cleaned out weekly
- e) Dryer lint screens are cleaned out prior to each use
- f) Drop Tests are performed on Fire Doors at NBCNI, NBSD and NBPL in September
- g) Fire extinguishers are recharged annually in December or January
- h) Building 1606 sprinkler system is recertified every 5-years

#### **7.7 Repairs**

The Supervisor arranges all repairs, services and periodic state and federal inspections with a vehicle repair service provider. Quotes are submitted to Fleet Maintenance for approval and PO.

#### **7.8 Record Keeping Requirements**

- a) Supervisors need to ensure all Drivers have proper licenses with endorsements as appropriate for each vehicle being operated. Each vehicle must meet company policy safety requirements, maintain a current Permit Book and meet all requirements of the Federal Motor Carrier Safety Administration (FMCSA).
- b) All state and federal inspection reports are to be kept at the facility for a minimum of three years.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Management of Polychlorinated Biphenyls (PCB)

**References:** (a) Code of Federal Regulations, Title 40 CFR Part 761  
(b) California Code of Regulations, Title 22 CCR Parts 66261 - 66262  
(c) Code of Federal Regulations, Title 49 CFR Parts 171 – 178  
(d) H&S Code Part 25250.1

**Enclosures:** (1) CSW-005 (Waste Turn-In Form)  
(2) CSW-019 (Uniform Hazardous Waste Manifest)  
(3) CSW-039 (PCB Waste Tracking/Disposal Log)  
(4) CSW-040 (PCB Labels)  
(5) CSW-041 (PCB Description Code List)  
(6) CSW-096 (Unmarked non-PCB Ballasts)

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### 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel performing environmental services with guidelines for acceptance, management and the transportation of Polychlorinated Biphenyls (PCB) hazardous waste (HW).

### 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

The Environmental Protection Agency (EPA) and the Department of Toxic Substance Control (DTSC) have established regulations governing the management of hazardous waste. The Service Provider operates a Part B permitted hazardous waste facility with a storage area designed specifically for the storage and management of all PCB waste streams regulated by the Toxic Substance Control Act (TSCA).

### 3. SCOPE

This procedure defines PCB hazardous waste management procedures and guidance for Service Provider personnel.

### 4. ACTION

This document applies to all Service Provider personnel receiving, storing and managing PCB hazardous waste.

## 5. DEFINITIONS

- a) **Accumulation Start Date** – is the date the material was determined to be a PCB waste and the decision was made to dispose of it. This date is the date the PCB article was removed from service for disposal or storage.
- b) **Accumulation Time Limit** – Any PCB waste is required to be disposed of within 1 year of the accumulation start date (40 CFR Part 761.65).
- c) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- d) **CSW**- Containerized Solid Waste
- e) **Customer** – the Navy group or Navy subcontractor who has the waste and has a proper Job Order Number with funding set up with the Navy Residual Organization.
- f) **Hazardous Material** – is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- g) **PCB's** – are manufactured synthetic liquids that are fireproof when highly pure. Their properties made them commercially attractive which included: a high degree of chemical stability, high heat capacity, low electrical conductivity, and favorable dielectric constant. Because of their persistence, toxicity, and ecological damage via water pollution their manufacture was discontinued in the U.S. in 1976.
- h) **PCB Item** – Any PCB article, PCB container or PCB equipment that deliberately or unintentionally contains any PCB's.
- i) **PCB Article** - Any manufactured item, other than a container, which has been in direct contact with PCB's. Examples: oil-filled transformers, capacitors, oil filled switches, oil fused cutouts (O.F.C.).
- j) **PCB Equipment** - Any manufactured item, other than a PCB container, which contains a PCB article. Example: fluorescent light ballasts.
- k) **PCB Container** - Any package, can, bottle, bag, barrel, drum, tank or other device used to contain PCB's or PCB articles and has been in direct contact with PCB's. Examples: drums of oil, drums of leaking capacitors, sample bottle of oil, drum of soil/debris.
- l) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.

## 6. RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Ensures all items listed in PCB Management Procedure.
- b) Certifies all personnel have the proper personal protective equipment.
- c) Manages all documentation required for PCBs.

## 7.0 PROCEDURES

## 7.1 Regulatory Requirements

Under section 18 of the Federal Toxic Substance Control Act (TSCA), the states are given the right to apply more stringent PCB regulations. TSCA regulates PCB waste at greater than or equal to 50ppm and allows drained PCB-contaminated transformers to be disposed of in municipal landfills. California DTSC regulations are more stringent and are as follows:

- a) Liquid PCB waste: California Code of Regulations Title 22 regulates PCB's as a hazardous waste when the concentrations are equal to or greater than 5 ppm in a liquid. Any transformers which contain oil containing PCB concentrations equal to or greater than 5 ppm must be handled as a hazardous waste.
- b) Non-liquid PCB Waste: California Code Regulations Title 22 regulates PCB's as a hazardous waste when concentrations are equal to or greater than 50 ppm in a non-liquid.
- c) Extremely Hazardous Waste: When the total concentrations of PCB's are greater than 5,000 ppm in a waste, DTSC then regulates this waste as an Extremely Hazardous Waste
- d) Recycling PCB Oil: CA Health and Safety Code instructs that PCB oil can only be managed as exempt "used oil" if concentration of PCB's is 2mg/kg or less. (H&S Code 25250.1(a)(3)(B)(vii).

## 7.2 PCB HW Pick-Ups

- a) PCB waste is stored at Naval Air Station, North Island. All PCB containing waste should be scheduled for pickup by HWF personnel regardless of the location of the waste. Customers requiring PCB waste disposal should contact the HWF Office at 545-6520 to schedule a pick up. HWF personnel will note the Out of Service (OOS) date, quantity and the type of PCB HW (drums, transformers, etc.) to be picked up and will arrange for the customer representative to be present at the pick-up site with a "Waste Turn-In Form" (Enclosure 1), a certified laboratory analysis, and a waste profile sheet. The environmental laboratory can provide sampling services for customers who do not currently have laboratory analysis. The Environmental Laboratory's phone number is 545-8431.
- b) PCB waste can not be picked up without laboratory analysis, with the exception of sealed items such as ballasts and capacitors:
  - If the ballast does not have a sticker that states 'No PCB's' see Enclosure (6) to determine if it is listed as a non-PCB ballast. Copies of Enclosure (6) are located in the non-PCB Ballast Binder as well as the Enclosure Binder. If it isn't listed contact the CM or Compliance Manager with the information (mfg., model #, photo) so it can be researched. Hold ballast as "pending research" and follow-up with CM or Compliance Manager.
- c) Free flowing liquid from PCB Equipment, such as transformers, should be removed and placed into drums or other proper containers before pick up is scheduled. This will reduce chances of leaks or spills during transportation to the storage facility.

- d) The Supervisor shall dispatch a HWF Disposer to conduct the pick-up. A spill kit should be available during pick-ups to provide spill containment supplies in the event of an accidental release.
- e) Upon arrival at the site at the scheduled pick-up time, the Disposer shall inspect the documents for accuracy and completeness. The Disposer shall also inspect the PCB hazardous waste for the correct packaging and labeling, and for any obvious or potential leaks that may be caused by loading, unloading, or transportation. The PCB waste shall be weighed and the weight shall be recorded in pounds on the Waste Turn-in Form for their records.
- f) Electrical equipment shall be adequately secured to pallets and then secured to the truck bed if considered unstable for transport.
- g) If use of public highways is necessary to transport the PCB hazardous waste to the PCB hazardous waste facility at NASNI, it shall be done in accordance with Reference (c).
- h) The transport vehicle must display PCB warning labels on all four sides in accordance with Reference (c).
- i) All Uniform Hazardous Waste Manifest copies (Enclosure 2) shall be forwarded to the NASNI HWF for proper mailing and filing. Copies of the manifests must be kept for three years in the Facility PCB records.

### 7.3 Storage of PCB HW

- a) Store all PCB hazardous waste inside the storage building in Bay 1 designed according to regulations to store PCB waste.
- b) For areas other than the permitted hazardous waste facility, the following PCB items may be stored temporarily up to 30 days in an area that does not comply with requirements (notification of the out of service date and description of PCB item must be attached).
  - Non-leaking PCB Articles and PCB Equipment.
  - Leaking PCB Articles and PCB Equipment if the PCB items are placed in a non-leaking PCB container that contains sufficient absorbent materials to absorb any liquid PCB's remaining in the PCB Items.
  - PCB containers containing non-liquid PCB's such as contaminated soil, rags, and debris.
  - PCB containers containing liquid PCB's at concentrations of  $\geq 50$  ppm provided a Spill Prevention, Control and Countermeasure Plan has been prepared for the temporary storage area
- c) Regardless of the date the PCB hazardous waste is brought into the storage facility, PCB hazardous waste shall be disposed of within 1-year from the date it was determined to be a hazardous waste and was removed from service.
- d) Each PCB article or equipment containing or contaminated with PCB waste must be labeled with a special PCB label (Enclosure 4) specified by 40 CFR 761.45.

- e) Leaking PCB Articles and PCB Equipment shall be stored in a non-leaking PCB Container that contains sufficient absorbent materials to absorb any liquid PCB's remaining in the PCB Items in accordance with 761.65(c)(1)(22).
- f) A 1348-1 document is prepared by the Supervisor and is submitted to the DGR for approval. The approved document is then sent to the Defense Logistics Agency Distribution Service (DLA DS).
- g) The PCB hazardous waste will remain in the storage area until the DLA DS contractor performs a scheduled inspection and arranges for removal and transportation to a final disposal facility.

#### **7.4 Personal Protective Equipment**

When handling any PCB waste or materials containing PCB's, HWF personnel must wear or use PPE that will protect against dermal contact with PCB's. If accidentally spilled on hands or other parts of the body, wash the skin thoroughly with soap and water. Eye contact may result in painful irritation; flush eyes with large amounts of water then report to a physician immediately for treatment.

#### **7.5 Documentation**

##### **7.5.1 Required Records**

All PCB waste must be accompanied by the proper documentation. This includes, but is not limited to, profile sheets, laboratory analysis, and Safety Data Sheets (SDS). The sample ID or equipment serial number must be placed in the top right hand side of the documents. This will assist in the completion of the 1348-1 disposal documents. Make a copy of the documentation for each different waste and attach it to the appropriate container or PCB equipment. The original copy should be filed with the Waste Turn-in form.

##### **7.5.2 Annual Document Log**

Each facility using or storing PCB HW shall develop and maintain at the facility a written annual document log in accordance with Reference (a) for the disposition of PCB's and PCB items. The written annual document log must be prepared for each facility by July 1 covering the previous calendar year (January through December). The written annual document log shall include the following:

- a) Name, address, and EPA identification number of the storage or disposal facility and the calendar year covered by the annual document log.
- b) For each manifest generated or received by the facility during the calendar year, the unique manifest number and the name and address of the facility that generated the manifest and the following:
  - For Bulk PCB waste: the weight in kilograms, the first date PCB waste placed in tanker or truck was removed from service, the date received at the facility, the date placed in transport for off-site disposal (if applicable), and the date of disposal (if known).

- For PCB container or PCB article containers: Unique number assigned by generator identifying container, weight in kilograms of PCB waste in the PCB article, the date removed from service for disposal, the date placed in transport for off-site facility (if applicable), and the date of disposal (if known).
- For PCB article not in a PCB container of PCB article containers: Serial number or other means of identifying each weight in kilograms of PCB waste in the PCB article, the date removed from service for disposal, the date placed in transport for off-site facility (if applicable), and the date of disposal (if known).

## 7.6 Annual Records

Each facility using or storing PCB HW shall develop and maintain at the facility annual records in accordance with Reference (a) to include:

- a) All signed manifests generated or received at the facility during the calendar year.
- b) All Certificates of Disposal that have been generated or received by the facility during the calendar year shall be attached to the corresponding manifest. The HWF Office manages all PCB manifests and Certificates of Disposal.
- c) Records of inspection and cleanups.

## 7.7 Tracking

All waste stored at the PCB storage facility must be tracked. The required information must be entered into the appropriate columns in the PCB Waste Tracking/Disposal Log (Enclosure 3).

The following information is a description of what each column must contain:

- a) Unique Containers ID#: In this column enter the unique 7 digit ID# given to all containers and items received at the HWF.
- b) Control #: In this column enter the control # assigned to the waste prior to the waste being transported to the HWF.
- c) Description Code: In this column enter the description code from the "PCB Description Code Listing" (Enclosure 5). This description is important for creation of the annual document log.
- d) ACC Date: In this column enter the date the waste is received at the facility.
- e) Size and Type of Container: In this column enter the size of the container as well as the type of container (DF= poly, DM = metal).
- f) Weight: In this column enter the weight of the waste in kilograms. The conversion from pounds to Kg is to divide the total pounds by 2.2.
- g) Out of Service Date: In this column enter the date the equipment or waste was removed from service. *With PCB's, this date is important because federal regulation requires PCB's to be disposed of within one year from this date.*
- h) D.S.P. #: In this column enter the disposal serial number.
- i) Sample I.D. #: In this column enter the Sample I. D. # from any laboratory analysis used to identify the contamination levels.

- j) Incoming Manifest # and Date: If the PCB waste is brought to the facility from offsite, then the waste will arrive on a Manifest. In this column enter the number and the date of the manifest used to transport the PCB waste to the HWF.
- k) Outgoing Manifest # and Date: In this column enter the number and the date of the outgoing Manifest used to transport the PCB waste to the final disposal facility.

## 7.8 Accumulation Time Limits

- a) Storage Limitation: Any PCB waste shall be disposed of within 1 year from the date it was determined to be PCB waste and the decision was made to dispose of it. This date is the date of removal from service.
- b) Accumulation Time Limit Extension: In accordance with Reference (a), the EPA Regional Administrator for the region in which the PCB waste is stored may be modified in writing to request a 1-year time limit extension if it is necessary for the proper disposal of PCB waste. The following conditions must be met:
- Continuing attempts to dispose of or secure disposal for waste have been unsuccessful.
  - Requires a written record documenting all continuing attempts to secure disposal is maintained until waste is disposed of.
  - The notification is received by the EPA Regional Administrator at least 30 days prior to the initial 1-year time limit expires.

Failure to initiate and continue attempt to secure disposal throughout the total time the waste is in storage shall automatically disqualify the notifier from receiving an automatic extension. In addition, a separate request must be submitted to Department of Toxic Substance Control (DTSC) to request an extension under part B permit conditions if the PCB hazardous waste is expected to exceed the 1-year facility acceptance date.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Empty Container Management

**References:** (a) California Code of Regulations, Title 22, Part 66261.7  
(b) California Fact Sheet of March 2003 Managing Empty Containers

**Enclosures:** (1) CSW-042 (Hazardous When Empty Sticker)

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## 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel providing environmental services with guidelines for the management of empty containers

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. As part of this service the Service Provider manages containers that previously held hazardous material to ensure their proper disposition.

## 3. SCOPE

This procedure does not cover empty container eligibility and preparation (by cutting) for the recycling bin. It does, however, define empty containers and is guidance for HWF personnel on the management of empty containers. This includes processes and controls for containers to be recycled.

## 4. ACTION

This document applies to HWF personnel who receive, store, and otherwise manage, including preparation for recycling, empty containers at the HWF.

## 5. DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use, poses a risk to health, safety, or the environment.

- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- f) **Empty Container** – A container, or an inner liner removed from a container, which previously held a hazardous material, including hazardous waste, is empty if the container or the inner liner removed from a container has been emptied so that:
  - If the hazardous material which the container or inner liner held is pourable, no hazardous material can be poured or drained from the container or inner liner when the container or inner liner is held in any orientation (e.g. tilted, inverted, etc.).
  - If the hazardous material which the container or inner liner held is **not** pourable, no hazardous material remains in or on the container or inner liner that can feasible be removed by physical methods (excluding rinsing) which comply with applicable air pollution control laws which are commonly employed to remove materials from that container or inner liner. Following material removal, the top, bottom and sidewalls of such a container shall not contain remaining adhered or crusted material resulting from buildup of successive layers of material or a mass of solidified material. A thin uniform layer or dried material or powder is considered acceptable. A person who treats a container or inner liner onsite by employing physical methods to satisfy the standard in this subsection is authorized to perform such treatment for purposed of Health and Safety Code Section 25201.

## 6. RESPONSIBILITIES

### 6.1 HWF Personnel

- a) Determine if container meets the definition of empty.
- b) Assign appropriate profile number to empty container.
- c) Manage and mark empty containers properly.
- d) Remove hazardous labels for empty containers.
- e) Ensure threaded bung caps are maintained on empty containers.

## 7.0 PROCEDURES

The following procedure shall be used to manage containers that previously held hazardous material.

- 7.1 When waste is first offered for disposal, review the supporting documentation and investigate the container to determine whether or not it is empty.
  - a) Set up additional empty container for collection of possible excess liquids.
  - b) If liquid drips out of the container when tipped for ten seconds or if the container rattles when shaken, manage the container as if it were full.
  - c) When the container is empty such that all material has been removed by any practicable means, proceed to next bullet.

- 7.2 Determine by reading the container label and/or by review of any associated records, i.e. SDS, turn-in form, analysis, or other supporting documentation, whether the container previously contained an acutely hazardous or extremely hazardous material (including any material with an “\*” in Title 22 CCR Appendix X)
- a) Containers that previously contained an extremely hazardous or acutely hazardous material will have affixed a special sticker, stating “**ATTENTION – THIS CONTAINER HAZARDOUS WHEN EMPTY**” (Enclosure 1). These containers shall be managed as hazardous material.
  - b) If the container did not previously contain an extremely hazardous or acutely hazardous material, proceed to next bullet.
- 7.3 Separate the containers greater than five gallons in capacity from those five gallons or less in capacity.
- a) Containers five gallons or less in capacity that meet the definition of “empty” and did not previously contain extremely or acutely hazardous waste do not require marking as stated in the next bullet and are exempt from further regulation. Base Recycle requires rendering the containers unusable.
  - b) Containers greater than five gallons in capacity must be marked as stated in next bullet and must be managed within one year of being processed.
  - c) The following are not considered containers for the purpose of this SOP:
    - Used oil filters.
    - PCB or PCB contaminated electrical equipment.
- 7.4 Empty containers greater than five gallons and all containers being reused, mark the outside of the containers as follows:
- a) The word “empty” or the letters “MT” to let personnel know that this container is empty.
  - b) The date that the container was emptied.
  - c) The type of material that the container previously contained.
- 7.5 Empty containers must be managed by one of the following methods:
- 7.5.1 Reissue Containers
- a) Previously held:

RP12 (oil, JP-5, Diesel)	RT30 (antifreeze)
NL17 (AFFF) is re-issued.	HE21 (non-ignitable aerosols)
HP22 (oily rags w/metals)	HT11 (liquid w/metals, oils & fuels)
HT12 (ethylene glycol)	ND12 (non-hazardous grease)
NL12 (detergents)	NL13 (floor wax)
RT32 (drained Oil Filters)	RT61 (rags w/POL)
  - b) minimum container condition criteria prior to re-issue:
    - UN markings clearly legible
    - No evidence of rust pitting
    - No dents > ¼” deep

In good overall condition

- c) Place a label on each drum which reads as follows:

“For Antifreeze, POL, and POL contaminated materials only.

Call (619) 545-6520 with questions.”

**7.5.2** If plastic containers will not be reused - drain and render unusable by cutting, drilling or other method and place in plastic recycle bin.

**7.5.3** If metal containers cannot be reused – drain, crush or puncture bottom, and place in metal recycling bin.

**Drum Crusher Operation:**

1. Inspect the drum to make certain it is empty and all plugs/bungs are removed from the lid
2. Release the door latch and open door
3. Slide drum into middle of the chamber
4. Close door and secure latch
5. To start crushing press the “Down” button.

**7.5.4** Contact Recycler for waste pickups

**7.5.5** The HWF Supervisor (Supervisor) shall perform inspections and document Weekly Recycle Bins (metal, plastic, and cardboard) for the following:

- a) No liquids
- b) No hazardous waste labels or DOT HAZMAT labels
- c) No excessive solid residue (i.e. scrapable)
- d) No closed containers (i.e. lids must be off)
- e) No containers >5 gallons that are not cut.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Universal Waste Management

**References:** (a) Code of Federal Regulations, Title 40 Part 273  
(b) California Code of Regulations, Title 22, Part 66273  
(c) Code of Federal Regulations, Title 49 Parts 171-180  
(d) Certified Unified Program Agency

**Enclosures:** (1) CSW-043 (Straight Bill of Lading)  
(2) CSW-081 (Universal Waste Label)

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## 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidance for universal waste identification, management, and transportation in accordance with the references provided above.

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

The Environmental Protection Agency (EPA) has established regulations governing HW management. The EPA has streamlined regulations for certain widely generated wastes, known as "Universal Wastes" (UW) in an effort to ease the waste management burden and to facilitate waste recycling. UW handlers and transporters do not need special operating permits; UW is not tallied on HW generation reports; and UW is not manifested as HW when shipped. Additionally, UW is allowed increased accumulation time limits and reduced record keeping requirements.

Pursuant to regulatory definitions and in accordance with the references, the HWF shall operate as a large quantity generator and a handler of UW by receiving UW from other handlers, accumulating the UW for less than one year and sending the accumulated UW to a destination facility for ultimate treatment, recycling or disposal.

## 3. SCOPE

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These standard policies and procedures are applicable to all Operator personnel, except where superseded by regulations or Navy requirements.

This procedure defines the guidance for HWF personnel to conduct UW operations.

#### 4. ACTION

This procedure applies to HWF personnel receiving, shipping and otherwise managing UW.

#### 5. DEFINITIONS

- a) **Accumulation Start Date (ASD)** – The date a generator decides to discard a UW or the date a UW handler receives a UW.
- b) **Accumulation Time Limit** - UW generators and handlers are allowed one year to accumulate UW.
- c) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- d) **CSW**- Containerized Solid Waste
- e) **Destination Facility** - A facility that treats, recycles, or disposes of a particular category of waste.
- f) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- g) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- h) **Large Quantity Universal Waste Generator (LQUWG)** - A UW generator or handler who accumulates 5,000 kilograms (11,000 lbs) total of a UW category at any time.
- i) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- j) **Universal Wastes** – (UW) Six categories of widely generated waste governed by modified waste regulations: batteries, tube or bulb lamps, mercury containing devices, dental amalgam, electronic devices, and CRTs as described in Title 22 CCR 66273.
- k) **Universal Waste Handlers** - A generator of UW and/or the operator of a facility that accumulates UW received from other UW generators or handlers.

#### 6. RESPONSIBILITIES

##### 6.1 HWF Supervisor (Supervisor)

- a) Responsible for overall compliance of the HWF with this SOP.
- b) Reports any non-compliance with this SOP to the CSW Manager (CM).
- c) Ensures that HWF personnel are proficiently trained on the procedures and guidance established in this SOP.
- d) Procures the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency UW operations.
- e) Trains HWF personnel on the proper use of PPE and response equipment.
- f) Ensures unsafe work conditions and operational deficiencies are corrected.

##### 6.2 HWF Leader/ Disposer (Leader/Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.

- b) Performs all work in a safe manor so as not to cause personal harm or injury, or endangers the health and safety of others.
- c) Understands the associated hazards, and takes the necessary health and safety precautions.
- d) Reports observed and perceived non-compliance with this instruction to the Supervisor.

## 7.0 PROCEDURES

### 7.1 Descriptions

- a) Universal Waste Lamps
  - Lamp types include but are not limited to: neon, high intensity discharge, mercury vapor, high-pressure sodium, low pressure sodium, metal halide lamps and, most commonly, fluorescent lamps. These lamp types shall be accepted as UW and labeled as, Universal Waste – Lamp(s).
  - Broken, damaged, or leaking lamps are managed as a UW, but must be immediately cleaned up and placed into an airtight container. Label the container Universal Waste – Lamp(s) and it is recommended that “accidentally broken” be written on the label.
- b) Universal Waste Batteries
  - Battery types include but are not limited to: NiCad, lithium, alkaline, carbon zinc, nickel metal hydride, mercury, magnesium, and small sealed lead acid.
  - Spent automotive type lead acid batteries are not universal waste.
- c) Universal Waste Mercury Containing Articles
  - Mercury containing articles include but are not limited to: thermostats, thermometers, mercury switches (motor vehicle switches & non-automotive switches), pressure and vacuum gauges, and mercury containing novelties.
- d) Universal Waste Dental Amalgam
  - Dental amalgam tooth filling materials including waste amalgam, bits and pieces from chair side traps, and spent wastewater filters.
  - Dental amalgam has the potential of being a biohazardous waste instead of a Universal Waste if it contains human blood. Dental amalgam that has not been segregated from human blood must be managed as a biohazardous waste and is not acceptable under our storage permit. (Have Activity representative sign Non-biohazard Certification.)
- e) Universal Waste Cathode Ray Tubes (CRTs)
  - Cathode ray tubes, also known as picture tubes, are found in devices that include but are not limited to, televisions and computer monitors.
- f) Universal Waste Electronic Devices
  - Electronic devices include any electronic equipment without a CRT - i.e. cell phones, telephones, computer CPUs, printers, VCRs, and portable DVD players.

## 7.2 Notification

- a) Waste Operations: As the HWF is currently in possession of an EPA identification number, UW operation notification to a federal, state, or local agency is not required.
- b) Rejection of Shipment: Generators or handlers of UW shipments shall be notified of rejected UW shipments to, as necessary, make arrangements to return the rejected UW shipment.
- c) Illegal HW Shipment: DTSC must be notified when the HWF receives HW incorrectly shipped as UW. Notification shall include: the name and address of the offending UW handler, the shipment date, and the type of quantity of HW. DTSC will provide instructions for managing the HW,

## 7.3 Picking Up UW

When picking up UW from activities:

- a) Ensure that the generator has affixed "Universal Waste" labels (Enclosure 2) that include the accumulation start date (ASD) to each container. If not, affix a label and enter the ASD as the date of pick-up.
- b) Ensure Waste Turn-In Forms are correct and complete.
- c) If the UW lamps, batteries, mercury containing articles, electronic devices, or CRTs are broken, damaged, or leaking, immediately place into a sealable, airtight container and label accordingly.
- d) Verify that all UW items are segregated according to type and physical state (wet versus dry).
- e) UW lamps must be containerized and packaged so as to prevent breakage. The lamp's original box or a CH provided box and packaging is usually preferred.
- f) Weigh the lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or, CRTs and record the weight on the Waste Turn-In Form.
- g) Give the customer the Waste Turn-In Form pink copy; keep the white and yellow copies with the shipment.

## 7.4 Transporting UW

After ensuring the above, when transporting UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's to the HWF on public roadways:

- a) Ensure that the generator has affixed "Universal Waste" labels that include the ASD to each container. If not, affix a label and enter the ASD as the date of pick-up.
- b) List UW lamps, batteries, mercury containing articles, dental amalgam, CRTs, or electronic devices on a bill of lading (see Enclosure 1).

**NOTE:** UW lamps, batteries, mercury containing articles, dental amalgam, CRTs, and electronic devices are not manifested as HW.

**REMINDER:** Do not use the "Hazardous Waste" proper shipping name or modify a proper shipping name with the word "Waste" when describing UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's, on the bill on lading or container marking.

- c) Label containers with the appropriate hazard class, if applicable.
- d) Placard the transporting vehicle as required for shipments greater than 1001 pounds of one DOT hazard class.
- e) UW lamps transported to the HWF shall always be adequately containerized or packaged and loaded or braced to prevent breakage or leakage.
- f) UW transported on public roadways shall be in compliance with Department of Transportation (DOT) Title 49, CFR 171-180 regulations as applicable.

#### 7.5 Receiving UW

When receiving UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRTs into the HWF:

- a) Unload vehicles in the waste receiving area.
- b) Ensure container markings and labels are legible and correct.
- c) Consolidate small quantities of UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's, with previously accepted UW of the same type.

#### 7.6 UW Management

- a) Containerize in DOT approved drums, pails, or boxes so as to prevent breakage and leakage.
- b) Segregate UW by type and store in the appropriate UW storage area/bay.
- c) Although low pressure sodium lamps could be water reactive if broken, the manufactures have not classified them as a hazardous material for water reactivity as a manufactured article. The DOT defers to the manufacturer's classification determination and as such they are not subject to the hazardous material regulations. However, CHES has decided to use a combination packaging; sealed plastic bag containing the intact lamps packed inside of a non-UN fiberboard box. The Universal Waste markings still apply.

NOTE: 49 CFR §173.307 – Exceptions for compressed gases: (a)(6) Light bulbs, provided they are packaged so that the projectile effects of any rupture of the bulb will be contained within the package.

- d) Ensure that the storage container/bin/area is properly labeled with a "Universal Waste" label affixed with the ASD.
- e) Consolidate lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's, and stack containers safely so as to maximize storage space and prevent damage.
- f) As part of the normal weekly routine, inspect and document all UW storage bins/areas to ensure proper labeling, packaging, and storage time limits.
- g) Store with container marking visible.
- h) Ship to a destination facility within one year of receipt into the HWF.

**NOTE:** Report UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's, nearing the expiration of the one-year accumulation time limit to the Supervisor.

**7.7 UW Accumulation Time Limits**

The HWF is allowed to accumulate UW for one year from the date of receipt into the facility. UW accumulation times shall be tracked based on the date the UW is received into the facility.

**7.8 Shipping UW**

When shipping UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, or CRT's, to a destination facility:

- a) Ensure UW lamps, batteries, mercury containing articles, dental amalgam, electronic devices, CRT's, and containers are in the same good condition as when received and comply with applicable DOT regulations.
- b) Ensure that each container has a "Universal Waste" label (Enclosure 2) affixed with an ASD.
- c) Label containers with the appropriate DOT hazard class label, if applicable.
- d) List UW on a bill of lading (See Enclosure 1)
- e) Do not use the "Hazardous Waste" proper shipping name or modify a proper shipping name with the word "Waste" when describing UW lamps, batteries, mercury containing articles, or dental amalgam on the bill of lading or container marking.
- f) Close out UW entries in EWBATS, i.e. indicate that the waste has been sent out for disposal.
- g) Give the bill of lading to the transporter, keeping a copy for HWF disposal files.
- h) Placard the transporting vehicle as required for shipments greater than 1001 pounds of one DOT hazard class.

**7.9 Common Proper Shipping Description**

The proper shipping description includes the ID number, proper shipping name, hazard class, and the packing group assigned from the 49 CFR 172.101 Hazardous Material Table.

Refer to the Hazardous Material Table 172.101 for lamps not listed below. Keep in mind that not all UW's are regulated as HM by the Department of Transportation.

Common Name	Shipping Description
Fluorescent Lamps, High Intensity Discharge Lamps, Mercury Vapor Lamps, Metal Halide Lamps, Neon Lamps, and High and Low Pressure Sodium Lamps	Given the amount of mercury in each lamp and the 1 lb RQ limit for mercury, no package will contain more than 1 lb hence the lamps are not considered to be a hazardous substance and not regulated as a DOT material. Although 40 CFR 273.34(e) Universal Waste Lamp(s), Waste Lamp(s), or Used Lamp(s) are acceptable labels/markings, Title 22 CCR 66273.34 now only allows Universal Waste – Lamps etc.
Alkaline Batteries	Batteries, dry, sealed, n.o.s.
Carbon-Zinc Batteries	Batteries, dry, sealed, n.o.s.
Lead Acid Batteries – small, sealed	Batteries, wet, non-spillable, 8, UN2800, PGIII

Lithium Batteries	Lithium battery, 9, UN3090, PGII
Magnesium Batteries	Batteries, dry, <i>not subject to the requirements of this subchapter</i> , (magnesium batteries)
Mercury Batteries	Batteries, dry, containing potassium hydroxide solid, 8, UN3028, PGIII
NiCad Batteries - Dry	Batteries, dry, containing potassium hydroxide solid, 8, UN3028, PGIII
NiCad Batteries - Wet	Batteries, wet, filled with alkali, 8, UN2795, PGIII
Nickel-metal hydride Batteries	Batteries, dry, containing potassium hydroxide solid, 8, UN3028, PGIII
Manufactured articles containing mercury	Mercury, <i>contained in manufactured articles</i> , 8, UN2809, PGIII
Dental Amalgam	Environmentally hazardous substances, solid, N.O.S. (silver, mercury), 9, UN3077, PGIII
Cathode Ray Tubes	CRTs are not classified as a hazardous substance, therefore they are not regulated as a DOT hazardous material
Electronic Devices	Electronic devices are not classified as a hazardous substance, therefore they are not regulated as a DOT hazardous material

**7.10 Tracking**

- a) UW is tracked using the waste received on bills of lading and from the HW Turn-in Forms.
- b) UW storage area or container signage, or individual UW markings shall indicate the UW category and the earliest UW receipt date as means to track accumulation start dates (ASD).

**7.11 Record Keeping**

The following hard copy records and EWBATS system database shall be kept for three years from task completion:

- a) UW receiving and shipping documentation and EWBATS.
- b) HWF personnel training.
- c) UW related notifications.
- d) Spill response reports.

**7.12 Spills and Releases**

Clean up and report spills and releases to the Supervisor. Manage clean-up debris with HW characteristics as HW.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Lab Pack Preparation

**Reference:** (a) Code of Federal Regulations, Title 40, Part 262.30  
(b) Code of Federal Regulations, Title 40, Part 264.316  
(c) Code of Federal Regulations, Title 40, Part 265.316  
(d) Code of Federal Regulations, Title 49, Part 173  
(e) Code of Federal Regulations, Title 49, Part 178  
(f) Code of Federal Regulations, Title 49, Part 179  
(g) California Code of Regulations Title 22, Sections 66264.316 & 66265.316

**Enclosures:** (1) CSW-016 (Packing List)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) identifies the steps required for the preparation of lab pack quantities of various waste streams in lab pack containers. Lab packing is the process by which similar waste streams of small quantities (sealed containers) are consolidated into one or more containers for easier disposal.

## 2.0 BACKGROUND

The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

## 3.0 SCOPE

This documented procedure is required to support the operations of the Service Provider under contract ID # N62473-10-D-43009, further defined in the Performance Work Statement Section 3.3 and 3.3.2.2. This procedure details the steps necessary to prepare lab pack containers for storage and DOT Transportation.

## 4.0 ACTION

This procedure applies to Service Provider personnel conducting waste consolidation, packaging and storage activities at the Hazardous Waste Facilities (HWF) managed by the Service Provider.

## 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **EPA** – Environmental Protection Agency
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use, poses a risk to health, safety, or the environment.
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- f) **Label** - the shape of a diamond and it measures 3.9” on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table &172.101, with additional information available in Subpart E of reference (c).
- g) **Level D Protection**
  - Safety glasses with side shields
  - Work Uniform
  - Nitrile Inner gloves with puncture resistant outer gloves – PVC or Powerflex
  - Leather Steel-toed boots
- h) **LDR** – Land Disposal Restriction notification and certification form(s)
- i) **Powerflex** - When used in the context of this SOP, a type of protective glove
- j) **PPE** — Personal Protective Equipment
- k) **PVC** – Poly Vinyl Chloride; when used in the context of this SOP, a type of protective glove
- l) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- m) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy.
- n) **TSDF’S** – Transfer, Storage & Disposal Facilities.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Reports to and assists the CSW Manager (CM).
- b) Is responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedure and guidance established in the SOP.
- e) Ensures that the lab pack job is properly scheduled, there is a proper Job Order Number (JON) with available funding, and the crew has the proper packaging materials.

- f) Procures the proper personal protective equipment (PPE), supplies, and appropriate response equipment for routine and emergency HW management.
- g) Trains HWF personnel on the proper use of PPE and response equipment.
- h) Ensures unsafe work conditions and operational deficiencies are corrected.

## 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others.
- c) Accurately identifies, characterizes, and segregates waste materials.
- d) Accurately completes container contents packing lists and container labels.
- e) Accurately applies container labels and markings.

## 7.0 PROCEDURE

### 7.1 Health & Safety Requirements

- a) Whenever possible there shall be two personnel present during this procedure.
- b) PPE: While lab packing sealed material containers, the minimum level of protection is modified Level D protection.
  - Safety glasses with side shields
  - Work Uniform
  - Nitrile inner gloves with puncture resistant outer gloves – PVC or Powerflex
  - Leather steel-toed boots

### 7.2 Disposal Facility Guidelines

Receiving TSDF's may have specific packaging requirements concerning Lab packs. Leaders/Disposers must familiarize themselves with the specifics of these instructions as applicable.

### 7.3 Lab Packing Procedure

- a) Don Appropriate PPE. Level D PPE is appropriate for preparing lab pack containers
- b) Identify all chemical items to be lab packed
- c) Segregate waste items in terms of compatibility and treatment
- d) Place a four to six inch (4"-6") layer of absorbent material on the bottom of the outer container. Vermiculite is the preferred industry standard.
- e) Place a single layer of sealed lab pack items of containerized waste (top up) on the absorbent with at least two inches (2") of absorbent between the item containers and the inner container wall.
- f) As lab pack item containers are being placed into the outer container, complete container-contents packing list (Enclosure 1) noting chemical name, quantity, size, physical state, and EPA waste codes if applicable.
- g) Continue to pack lab pack item containers into the outer container and cover the container layers with two to three inches (2"-3") of absorbent.
- h) Fill the outer container, alternating layers of lab pack item containers and absorbent.

These standard policies and procedures are applicable to all Operator personnel, except where superseded by regulations or Navy requirements.

- i) Top off the container with four to six inches (4"-6") of absorbent material to complete the packaging.
- j) Affix the cover, gasket, ring and closure.
- k) Affix the appropriate container label, markings and container-contents packing list.
- l) Decontaminate as needed (i.e., tools, work area and personnel).
- m) Dispose of decon materials appropriately.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Lead Acid Battery Recycling

**Reference:**

- (a) Code of Federal Regulations, Title 40, Part 266
- (b) Code of California Regulations, Title 22, Part 66266, Article 7
- (c) Code of Federal Regulations, Title 49, Part 171-180
- (d) California H&SC Article 10.5 & 25215
- (e) Title 22 CCR 66260.1 – Definitions
- (f) Title 22 CCR 66273.2 – Universal Waste Management – Applicability – Batteries
- (g) Title 22 CCR 66261.6 – Requirements for Recyclable Materials
- (h) Title 22 CCR 66266.1 – 66261.12 – Recyclable Materials (Recyclable Hazardous Waste)
- (i) Title 22 CCR 66266.80 – 66266.81 – Requirements for Management of Spent Lead-Acid Storage Batteries
- (j) DTSC Letter dated December 14, 1994 - No requirement for Annual Report
- (k) 49 CFR 173.159 – DOT packaging requirements - Batteries, wet

**Enclosures:**

- (1) CSW-078 (Spent Lead Acid Battery Label)
- (2) CSW-043 (Straight Bill of Lading)
- (3) CSW-079 (Off-base Hazardous Waste marking label)
- (4) CSW-019 (Uniform Hazardous Waste Manifest)

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## 1.0 PURPOSE

To establish standard operating procedures and guidance for spent lead-acid battery identification, management, transportation, and recycling in accordance with the references.

## 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

The Environmental Protection Agency (EPA) has established regulations governing the management of hazardous waste (HW). The EPA has streamlined regulations for spent lead-acid batteries in an effort to ease the waste management burden and to facilitate battery recycling. Under the regulations, generators recycling spent lead-acid batteries are not required to maintain special operating permits; do not tally lead-acid battery quantities on HW generation reports; and

do not require a HW manifest to ship lead-acid batteries. Additionally, the recycling of spent lead-acid batteries allows increased accumulation time limits. Pursuant to regulatory definitions and in accordance with the references, Service Provider personnel shall pick up and transport spent lead-acid batteries from generators, store the batteries, and prepare them for shipment to an approved battery recycling facility. Spent Lead-Acid Batteries are not Excluded Recyclable Materials. According to H&S Code 25143.2, recyclable materials can be excluded from the hazardous waste classification if the material is: used or reused as an ingredient if the material is not being reclaimed; used or reused as a safe commercial products substitute if the material is not being reclaimed; or returned to the original process without first being reclaimed. The spent lead-acid batteries shipped out are being reclaimed first before the lead can be returned to make new batteries. Therefore, they do not qualify as Excluded Recyclable Materials. Examples of “Excluded Recyclable Materials” are spent acids and bases used by the waste treatment plant as a pH adjuster. Automobile “Spent Lead-Acid Batteries” are not “Universal Waste. Title 22 CCR Section 66273.2 (b) (1) specifically excludes automobile type spent lead-acid batteries from the Universal Waste regulations. “Spent Lead-Acid Batteries” are “Recyclable Material/Recyclable Hazardous Waste.” Spent Lead-Acid Batteries are classified as recyclable materials – Title 22 66261.6 (a) (2) (C) and regulated under Title 22 Chapter 16 (Recyclable Material/Recyclable Hazardous Waste). Additionally, EPA specifically notes that “Spent Lead-Acid Batteries” can be exempted from a portion of hazardous waste management requirements but not all - 40 CFR 266.80. The procedures outlined herein are based on Title 22 CCR 66266.81 (a) (6). Automobile batteries stored in quantity of one ton or more and for more than 180 days shall be managed as hazardous waste per Title 22 CCR 66266.81 (a) (7).

### 3.0 SCOPE

This instruction defines spent lead-acid battery management procedures and guidance for Service Provider personnel. This documented procedure is required to support the operations of the Service Provider under contract ID # N62473-10-D-4009, further defined in the Performance Work Statement Section 3.3 and 3.3.4.2. This instruction applies to Service Provider personnel receiving, storing, shipping, and otherwise managing spent lead-acid batteries.

### 4.0 ACTION

This instruction applies to Service Provider personnel receiving, storing, shipping, and otherwise managing spent lead-acid batteries.

### 5.0 DEFINITIONS

- a) **Accumulation Start Date – (ASD):** The date the spent lead-acid batteries are received into the HWF. Accumulation start date shall be written as dd mmm yy. (For example, 06 Jul 01).
- b) **Accumulation Time Limit:** If there is more than one ton in storage, the time allowed to accumulate batteries at the HWF is within 180 days of receipt. Other UW and HW storage limits apply if less than one ton in storage.

- c) **Hazardous Waste Facility – (HWF):** a consolidation, storage, and transfer facility for hazardous waste and hazardous materials.
- d) **Hazardous Waste – (HW):** any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- e) **Hazardous Material – (HM):** any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- f) **CSW:** Containerized Solid Waste.
- g) **Damaged Lead-Acid Battery:**
  - Cracked or damaged battery that is leaking or has the potential to leak.
  - Battery missing one or more cell caps.
- f) **Service Provider:** The company or entity operating a HWF and providing CSW management services to the Navy under contract N62473-10-D-4009.
- g) **Spent Lead-Acid Battery:** Discarded lead-acid batteries, which are equivalent to, or smaller in size, than lead-acid batteries removed from motor vehicles.
- h) **Lead-acid batteries that can be recycled:**
  - Starting batteries designed to deliver a high burst of energy necessary to crank an engine until it starts.
  - Motive power battery designed to provide the sources of power for propulsion or operation.
  - Stationary standby battery which is designed to be used in systems where the battery acts as a source of emergency power, serving as a backup in case of failure or interruption in the flow of power from the primary source.
  - Batteries must be <11 pounds.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Reports to and assists the CSW Manager (CM).
- b) Is responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedure and guidance established in the SOP.
- e) Procures the proper personal protective equipment (PPE), supplies, and appropriate response equipment for routine and emergency HW management.
- f) Trains HWF personnel on the proper use of PPE and response equipment.
- g) Ensures unsafe work conditions and operational deficiencies are corrected.
- h) Ensures that any recyclable material check is turned over to the CM so that manager can turn it over to the Navy RO Hazardous Waste Services Manager.

## 6.2 Hazardous Waste Leader/Disposer (Leader/Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.

## 7.0 PROCEDURE

### 7.1 Picking up from activities:

When picking up from activities, ensure that the batteries meet the spent lead-acid battery definition and are packaged, marked and labeled as required by the following procedures.

#### 7.1.1 Intact lead-acid batteries:

- a) Shall be properly packaged to prevent damage or short-circuiting of the battery terminals during transit in accordance with Reference (c).
  - o Ensure exposed terminals are protected with non-conductive caps, non-conductive tape, or by other appropriate means.
- b) Pallets must be sound and strong enough to hold the battery load while in transit. Batteries must be neatly arranged and secured to the pallet so as to prevent damage by short circuiting while in transit.
- c) Batteries may be triple stacked provided the battery terminals are adequately insulated with a corrugated cardboard pad.
- d) Stacked batteries must be tightly wrapped or banded to prevent the load from shifting during transit.
- e) Batteries must be properly marked with a "Spent Lead-Acid Battery" marking label (Enclosure 1). Ensure the shipping description is correct as per Reference (c).
  - o UN2794, Batteries, wet, filled with acid, 8, PGIII

#### 7.1.2 Damaged lead-acid batteries:

- a) Damaged lead-acid batteries must be adequately packaged in accordance with Reference (c) to prevent the release of corrosive material. Approved packaging for damaged lead-acid batteries includes 1H2 plastic drums, 3H2 plastic drums, or 4H2 plastic boxes. Metal (1A) drums are not authorized packaging for lead-acid batteries.
- b) Mark each container with an off-base hazardous waste marking label (Enclosure 3)

### 7.2 Off-site activity pickups:

When picking up from off-site activities the following procedures shall apply:

- a) Ship batteries on either a Uniform Hazardous Waste Manifest (Enclosure 4) or a Bill of Lading (Enclosure 2) per the requirements outlined in Reference (k). Damaged and intact batteries may be transported together, but damaged batteries shall be packaged to prevent any leaks or spills.
- b) Identify the batteries as a hazardous material on the shipping document.  
Ensure that the shipping address is correct and complete. In addition, ensure the shipping description is correct as per Reference (c).

- c) Do not use the word "Waste" to modify the proper shipping name for spent lead-acid batteries.
- d) Each battery must be properly marked and labeled as per Reference (c) with the "Spent Lead Acid Batteries" marking label (Enclosure (1) and with the DOT corrosive label. If each marking and/or label cannot be seen, i.e. if stacked on the pallet, the pallet must be marked on opposing sides with the "Spent Lead Acid Batteries" marking label and the DOT hazard class label. One label is **NOT** acceptable for a full pallet of stacked batteries.
- e) Ensure that the transporting vehicle is placarded if applicable as required in accordance with Reference (c) if transporting batteries on public roadways.

### 7.3 Receiving Spent Lead-Acid Batteries into the HWF:

When receiving batteries into the HWF ensure the following conditions are met:

- a) Batteries are unloaded from vehicles in the waste receiving area.
- b) Container markings are legible and labels are affixed to each container.
- c) Batteries are tracked and staged in the Acid Storage Bay.
- d) Batteries are segregated and consolidated with previously accepted batteries of the same type.
- e) Do not commingle different types of batteries on the same pallet.

### 7.4 Battery Management at the HWF:

- a) Spent lead-acid batteries managed at the HWF shall be:
  - Properly segregated by battery type;
  - Containerized and/or palletized so as to prevent breakage and leakage. Pallets containing intact batteries shall be marked with a "Spent Lead-Acid Batteries" marking label (Enclosure 1) and the ASD shall be written on marking label.
- b) Damaged battery containers shall be marked with a Hazardous Waste marking label that includes the ASD.
- c) Store all collected lead-acid batteries in the Acid Storage Bay.
  - More than one ton may not be stored for more than one hundred and eighty (180) days. Ensure batteries are shipped to a recycler within the one hundred and eighty (180) day timeframe.
  - Report lead-acid batteries that are nearing the expiration of the accumulation time limit to the Supervisor.
- d) Ship intact batteries to the battery recycling center within the accumulation time limits.

### 7.5 Shipping from the HWF to a Recycling Center:

When shipping spent lead-acid batteries to a recycling center ship in accordance with Reference (c) and ensure the following guidelines are met:

- a) Batteries are still in the same condition as when they were received into the HWF.
- b) Pallets shall be prepared properly for shipment. Pallets must be sound and strong enough to

hold the battery load while in transit. Use a wooden pallet that extends beyond the batteries.

- c) Batteries must be neatly arranged and secured to the pallet so as to prevent damage or short circuiting while in transit. This is accomplished by placing the batteries snug to each other on the pallet and separating layers with a corrugated cardboard pad.
- d) Batteries can be triple stacked. Ensure the batteries do not overhang the pallet and do not stack additional layers in a manner which causes them to overhang the layer below.
- e) Batteries will be shipped on a Bill of Lading as long as the requirements outlined in Reference (c) and (k) are met.

**7.6 Batteries not to be shipped to recycling center:**

Any damaged or compromised lead acid battery must be managed as HW and as such, may not be shipped to the recycling center.

**7.7 Accumulation Time Limits:**

- a) If there are more than one ton of lead acid batteries in storage, the HWF may only accumulate the lead-acid batteries up to 180 days of receipt.
- b) Accumulation times shall be tracked in the EWBATS database as lead-acid batteries are received into the HWF. In addition, the marking labels which are placed on the lead-acid battery containers shall reflect the accumulation start date.

**7.8 Transportation:**

- a) Spent lead-acid batteries transported to the HWF shall always be adequately containerized, packaged, loaded, and braced to prevent breakage or leakage.
- b) Spent lead-acid batteries shall be transported on public roadways in accordance with Reference (c).

**7.9 Record Keeping:**

Spent lead-acid battery Bills of Lading (Enclosure 2) for receipt and off-site shipments shall be kept for three years.

**7.10 Spills and Releases:**

Spills and releases shall be cleaned up immediately in accordance with the Spill Plan and reported to the CM. Clean-up debris displaying HW characteristics shall be managed as HW.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Disposal of Containerized Waste

**References:** (a) Code of Federal Regulations, Title 40, Part 261 - 263  
(b) California Code of Regulations, Title 22, Part 66261- 66263  
(c) Department of Transportation Special Permit – DOT SP-12842  
(d) Code of Federal Regulations, Title 49, Part 173.168  
(e) California Health and Safety Code, Section 25143.2(b)

**Enclosures:** (1) CSW-045 (Disposal Serial Log)

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### 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide support to Service Provider personnel performing operations under contract ID # N62473-10-D-4009, with guidelines for disposing of containerized waste including but not limited to Hazardous and Non Hazardous Solid Waste, asbestos, PCB, Universal Waste and excluded recyclable material.

### 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides hazardous waste and hazardous material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. As part of this service, the Service Provider will research, document, and recommend the most economical disposal option available to provide disposal services.

### 3.0 SCOPE

This procedure defines the process for disposing of containerized waste under contract ID # N62473-10-D-4009, at Naval Base Coronado, Naval Base San Diego, Naval Amphibious Base and Naval Base Point Loma. The Service Provider will maintain sufficient capacity to handle surge requirements. The Service Provider will also schedule shipments to minimize truck traffic through the various communities around the naval facilities.

### 4.0 ACTION

This procedure applies to the Service Provider's personnel responsible for outbound shipments of hazardous waste for final disposal.

### 5.0 DEFINITIONS

a) **Asbestos-** As mentioned under Title 22 CCR 66261.126 Appendix 12.

- b) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- c) **CSW** - Containerized Solid Waste.
- d) **DGR** is the Designated Government Representative.
- e) **DLA DS** - Defense Logistics Agency Disposition Services
- f) **Excluded Recyclable Material - (ERM)** is recyclable hazardous material excluded from classification as a hazardous waste because it is being managed in accordance with reference (e).
- g) **Hazardous Waste - (HW)** is any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- h) **Non Hazardous Waste - (NHW)** Items identified as waste but does not meet the definitions of hazardous waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- i) **PCB Waste**- As identified in SOP HW-05-009.
- j) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.
- k) **Universal Waste - (UW)** Three categories of widely generated waste governed by modified waste regulations; batteries, tube or bulb lamps, and mercury containing articles as described in California Code of Regulations (CCR) 66273. Universal Waste also includes empty aerosol cans, CRT's, dental amalgam, and consumer electronics.

## 6.0 RESPONSIBILITIES

### 6.1 CSW Manager – (CM)

- a) Ensures personnel responsible for shipment of waste have been provided adequate training to perform in compliance with regulations, policies, and procedures.
- b) Ensures waste is shipped for disposal or recycling prior to allowable storage time limits.
- c) Ensures documentation for shipment of waste is maintained per SOPs.
- d) Assists in the review of alternative disposal options for recommendation to the DGR.
- e) Updates SOPs as appropriate.

### 6.2 HWF Supervisor – (Supervisor)

- a) In conjunction with the CM and Profile Specialist, the Supervisor researches the most economical disposal option and selects appropriate TSDF.
- b) Documents and recommends best disposal option to DGR no later than 30 days prior to the allowable storage time limit.
- c) Upon DGR approval, coordinate and document disposal.
- d) Finalizes disposal documentation within 5 days of shipment.
- e) Reviews characterization of waste and ensures that it matches waste profile.
- f) Has all supporting documentation, including lab reports, SDS's, and profiles on file.
- g) Understands and complies with the procedures and guidelines established in this instruction.
- h) Generates DD-1348 documents for materials disposed of through the DLA DS.

- i) Performs all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others.
- j) Coordinates with DLA DS for inspection and final preparation of drums.
- k) Prepares waste for shipment including but not limited to proper marking, labeling, packaging and manifesting per SOP HW-05-006.
- l) Tracks waste out of inventory per SOP HW-05-028 and maintain associated records.

### 6.3 HWF Leader/Disposer – (Leader/Disposer)

- a) Understands and complies with the procedures and guidelines established in this instruction.
- b) Performs all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others.
- c) Conducts final inspection of containers and assists with loading.

### 6.4 United States Navy (DGR)

- a) The cost for disposal for all containerized waste will be government provided when authorized by the DGR.
- b) Approval of alternative disposal options.
- c) Setting up funding for disposal for the various commands.

## 7.0 PROCEDURES

### 7.1 Identification of waste ready for shipment to disposal/recycling sites.

- a) The wastes held in inventory are monitored and prepared for shipment based on the following criteria:
  - Containerized waste age is approaching 30 days prior to the allowable storage time limit.
  - Storage facility is reaching buffer storage capacity.
  - Sufficient quantity of waste has been accumulated to allow for economical shipment for disposal/recycling.

### 7.2 Pre-shipment Preparation

- a) Segregate waste for shipment based on disposal option. Where a new disposal option has been identified, get approval from the DGR before proceeding.
- b) For each disposal option, create a Delivery Order Folder per Appendix A and a Disposal Serial Log per Appendix B.
- c) Collect back-up characterization documentation for containers listed on the Disposal Serial Log. This may include packing lists, SDSs, or analytical results.
- d) For wastes disposed of through the DLA DS prepare and submit DD-1348 forms per SOP HW-05-031 and submit to DGR for approval. Submit approved DD-1348s and backup documentation to DLA DS for scheduling.
- e) For non-DLA DS shipments, make arrangements with the disposal or recycling facility for pickup or delivery following DGR approval.

### 7.3 Shipment Preparation

- a) Review other scheduled shipments to minimize truck traffic impact to local communities.

- b) Finalize shipment date.
- c) Prepare all shipment paperwork as outlined in Hazardous Waste manifesting SOP HW-05-006. Shipment paperwork for DLA DS shipments is prepared by the DLA DS contractor.
- d) Update preview paperwork as appropriate prior to shipment.

#### 7.4 Shipment

- a) Segregate waste to be shipped.
- b) Perform final inspection of containers.
- c) Perform or review labeling of containers.
- d) Load the truck.
- e) Complete manifest as outlined in Hazardous Waste manifesting SOP HW-05-006.

#### 7.5 Post Shipment

- a) Finalize and file the Delivery Order Folder with all data and documentation within 5 days of shipment.
- b) Resolve any applicable shipment discrepancies if necessary.
- c) Modify the site inventory tracking documents to reflect the shipment.
- d) The completed delivery order folder is used to close out inventory entered into EWBATS.

##### 7.5.1 Appendix A (Delivery Order Folder)

The Delivery Order Folder contains information necessary to move containers from inventory to the chosen disposal or recycling facility including:

- a) The Disposal Serial Log as described in Appendix B.
- b) Back-up characterization documents for containers listed on the Disposal Serial Log including packing lists, SDSs, or analytical results.
- c) Copies of DD-1348s completed per SOP HW-05-031.
- d) A copy of the initial Delivery Order Form DD-1155, for wastes disposed of through the DLA DS.
- e) A copy of the completed Delivery Order Form DD-1155 and any modifications, for wastes disposed of through the DLA DS.
- f) Copies of shipping papers (with generator and transporters signatures) including Bill of Ladings, Hazardous Waste Manifests, Land Disposal Restriction forms.

##### 7.5.2 Appendix B (Disposal Serial Log)

The Disposal Serial Log (Enclosure 1) is a list of containers disposed of on a particular shipment. It is identified by the Base and a Julian Date roughly corresponding to the date it was created.

The following information is listed for each container:

- a) Waste Stream Name
- b) Disposal Number – Sequential 4 digit number which may represent more than one container of like material (corresponds to the grouping of material into lines on a Hazardous Waste Manifest).
- c) Profile Number

- d) Container Number from the site's inventory tracking system.
- e) Weight of each container.
- f) Size and Type of each container.
- g) Bay Number where the container is stored.
- h) Accumulation Start Date
- i) Control Numbers from the site's inventory tracking system.

### 7.5.3 Appendix C (Wastes with Special Conditions for Shipment)

The following waste streams have additional requirements:

- a) **Batteries** must be segregated by type and packaged in a manner which will prevent short-circuiting during transport or subsequent storage. Additional requirements for lead-acid batteries are addressed in SOP HW-05-013. Batteries shipped as Universal Waste are addressed in SOP HW-05-011.
- b) **Aerosols** must be packaged in a manner to prevent discharge while in transport or subsequent storage. This can be done by ensuring the protective cap for each can is securely affixed or removal of the valve stems. If the aerosols will be transported over the public roadway and the gross weight of the container exceeds 66 pounds, the Disposer must ensure the requirements of DOT-SP-12842 are complied with. Although the exceptions granted by this SP have been incorporated into the regulations and is no longer needed, DLA DS continues to use it for reasons of their own.
- c) **Unspent oxygen generators** must be shipped in accordance with requirements outlined in Reference (d).

### 7.5.4 Appendix D (Excluded Recyclable Materials)

- a) **Rationale for Recycling Conditions:** Hazardous materials excluded from classification as a hazardous waste because they are managed as an Excluded Recyclable Material must meet one of the following conditions:
  - It is used or reused as an ingredient in an industrial process to make a product if the material is not being reclaimed.
  - It is used or reused as a safe and effective substitute for commercial products if the material is not being reclaimed.
  - It is being returned to the original process from which the material was generated, without first being reclaimed, if the material is returned as a substitute for raw material feedstock and the process uses raw materials as principal feed stocks.

- b) **Management and Storage Conditions:**

- Containers or tanks holding an ERM should be labeled, marked and placarded in the same manner as hazardous waste except that the words “Excluded Recyclable Material” replace the words “Hazardous Waste” on the label.
  - The owner or operator of the site where the ERM is stored, has a Business Plan that meets the requirements of California Health and Safety Code, Section 25504, including but not limited to emergency response plans and procedures.
  - The material is stored and handled in compliance with all local ordinances and codes.
- c) **Documentation:** The following documentation must be available to substantiate the classification of material classified and managed as ERM:
- A description of the ERM including the process that generates the waste.
  - The name, street and mailing address, and telephone number of the owner or operator of any facility that manages the material.
  - Copies of all ERM shipping records for the previous three years.
  - A description of how your material is being recycled.
  - Records that show there is a known market for the product after recycling,
  - If the recycler is located in California, maintain a copy of the unified program biennial excluded recyclable materials reports received from the recycler in the previous three years. The recycler is required by California Health and Safety Code, Section 25143.10 to provide this information to the generator of ERM biennially.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Textile Recycling

**Reference:** (a) Code of Federal Regulations, Title 40, Part 261-263  
(b) California Code of Regulations, Title 22, Part 66261- 66264  
(c) Clean Harbors SOP HW-05-004

**Enclosures:** None

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) outlines the steps necessary for the collection, management, laundering, distribution and disposal (when necessary) of textile rags and towels utilized by U.S. Naval Base operations in San Diego

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) pickup and disposal services to all bases in the San Diego area under contract ID # N62473-10-D-4009. The services also include the management of soiled textiles. The Environmental Protection Agency has established regulations governing the management of HW. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. The Service Provider's employees are trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This documented procedure is required to support the Service Provider's operations under contract ID # N62473-10-D-4009, further defined in the Performance Work Statement Section 3.3 and 3.3.4.1. Recycled textile management service will be provided to requesting commands and ships.

## 4.0 ACTION

This procedure applies to Service Provider personnel operating under contract ID # N62473-10-D-4009.

## 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste.
- c) **Hazardous Waste- (HW)** is any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 66261.3.
- d) **Level D Personal Protection Equipment (PPE)**
  - Safety glasses with side shields
  - Work Uniform
  - Nitrile Inner gloves with puncture resistant outer gloves – PVC or Powerflex

- Leather Steel-toed boots.
- e) **PVC** – Poly Vinyl Chloride; when used in the context of this SOP, a type of protective glove
- f) **Powerflex** - When used in the context of this SOP, a type of protective glove
- g) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Reports to and assists the CSW (CM).
- b) Is responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedure and guidance established in the SOP.
- e) Procures the proper personal protective equipment (PPE), supplies, and appropriate response equipment for routine and emergency HW management.
- f) Trains HWF personnel on the proper use of PPE and response equipment.
- g) Ensures unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Accurately identifies, characterizes, and segregates waste materials.
- d) Properly operates laundering equipment
- e) Packages textiles for return to commands and ships.

## 7.0 PROCEDURE

### 7.1 Collection – Red Rags

#### 7.1.1 Schedule & location

Red Rags are collected on Wednesday each week at customer locations on the North Island Naval Air Station

#### 7.1.2 PPE

Level D PPE is to be worn at all times while managing textile materials

#### 7.1.3 Collection and Quality Control

- a) Red Rags are to be bagged when received from customer
- b) Bags are to be loaded on transport vehicle and secured properly for transportation to the North Island Naval Air Station HWF.
- c) Upon arrival at the North Island Naval Air Station HWF, bags are to be opened and contents are to be examined for the presence of foreign objects or materials.
- d) Foreign objects or materials that are found to be in the textile bags are to be removed and stored appropriately for disposal.

- e) Textiles are to be examined for excessive oil, solvent, or other hazardous material contamination, which may foul or otherwise impair the laundering process.
- f) Textiles found to contain excessive oil, solvent or other hazardous material contamination are removed and placed in the appropriate HW container for disposal.
- g) Remaining textiles are to be placed in the designated containers in building 1096 prior to proceeding with laundering activities.

## **7.2 Collection – Shop Towels**

### **7.2.1 Schedule & Location**

Shop Towels are collected during pickups at pier locations only at the U.S. Naval Base in San Diego.

### **7.2.2 PPE**

Level D PPE is to be worn at all times while managing textile materials.

### **7.2.3 Collection and Quality Control**

- a) Shop towels are to be bagged when received from customer.
- b) Bags are to be loaded on transport vehicle and secured properly for transportation to the HWF.
- c) Upon arrival at the HWF, bags are to be opened and contents are examined for the presence of foreign objects or materials.
- d) Foreign objects or materials that are found to be in the textile bags are to be removed and stored appropriately for disposal.
- e) Textiles are to be examined for excessive oil, solvent or other hazardous material contamination, which may foul or otherwise impair the laundering process.
- f) Textiles found to contain excessive oil, solvent or other hazardous material contamination is to be removed and placed in the appropriate HW container for disposal.
- g) Remaining textiles are to be placed in transportation containers designated for shop towel laundering.
- h) Transportation to the North Island Naval Air Station laundry facility and exchange of the containers are to be arranged by contacting and coordinating with the HWF Leader.

## **7.3 Laundering**

### **7.3.1 Schedule and Location**

Laundering operations will take place on a daily workday basis at the North Island Naval Air Station HWF, building 1096.

### **7.3.2 PPE**

Level D PPE is to be worn at all times while managing textile materials.

### **7.3.3 Laundering Operation**

- a) Shop Towels are to be manually loaded from the designated container into rolling bins and moved to building 1096.
- b) Red Rags and Shop Towels are to be kept separate and not commingled during laundering operations.

- c) Red Rags are to be manually loaded into laundering machines; load level is not to exceed the height of the lower level indicator bar.
- d) Shop Towels are to be manually loaded into laundering machines, load level is not to exceed the height indicated by the mid-point between the lower level indicator bar and the upper level indicator bar.
- e) Add cleaning agent and close doors.
- f) Depress start button to initiate wash cycle, which will last approximately 45 minutes. If the cleaning agents are getting low, the HWF Leader or Supervisor must be notified so an order for more cleaning agent can be placed.
- g) Laundering machine doors are to remain closed at all times until completion of the cycle. At no time during the ongoing laundering cycle operation should the doors be opened. Spillage of liquid materials and oxidant contamination may occur should the doors be opened.
- h) Upon completion of laundering cycle, textile materials are to be removed from the laundering machines, and transferred to the drying units via rolling bins.
- i) Dryer units are to be loaded with textile materials
- j) Depress start button to initiate dryer cycle, which will last approximately 30 minutes.
- k) Upon completion of drying cycle, textile materials are to be removed from the drying units, and transferred to the packaging area via rolling bins
- l) Textile materials are to be bagged in burlap bags and placed on pallets for return to customers. Bags should weigh approximately 27 pounds. Red shop towels are bagged in smaller plastic bags – approximately 100 rags per bag.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Oil and Fuel Recycling

**References:** (a) Executive Order 12856 of 03 Aug 93  
(b) OPNAVINST 5090.1B, Environmental and Natural Resources Program Manual  
(c) State of California Health and Safety Code Section 25250  
(d) Code of Federal Regulations part 40

**Enclosures:** (1) CSW-046 (Recyclable Oil Label)  
(2) CSW-047 (Fuel Label)

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### 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel operating under contract ID # N62473-10-D-4009, with the guidelines for recycling of fuel and oil. Reference (a) mandates federal facility compliance with the Pollution Prevention Act of 1990, which requires reducing pollution by reusing and recycling hazardous materials to the maximum extent possible. Reference (b) directs Navy shore activities to establish and maintain programs for the segregation, reuse and recycling of used oils.

### 2. BACKGROUND

Under contract N62473-10-D-4009, the Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities, and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. The Service Provider will research, document, and recommend the most economical recycling option available to provide disposal and recycling services. All revenue received from the recycling of waste shall be returned to the government. Recycling used oil, petroleum products and reclaiming aviation fuel is a key part of NAVFAC's hazardous waste minimization effort. The oil is diverted from the waste stream and refined into other products such as marine diesel, heating oil and asphalt products by a petroleum recycling company.

### 3. SCOPE

This procedure defines the process for recycling fuel, specific petroleum products and oils, and is guidance for Service Provider personnel.

#### 4. ACTION

This document applies to Service Provider personnel who manage containerized waste for disposal and recycling of used fuel and oils

#### 5. DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Fuels** – (fuels includes JP-5, PD 680, and diesel) Fuel that is clear and bright, contains no dyes, and when swirled contains no evidence of contamination other than particulates and water is reclaimable. Fuel cannot be mixed with oil. Fuel that contains dyes or is suspected of contamination other than particulates or water is hazardous waste and must be managed accordingly.
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- f) **Recycling** - Process of collecting, sorting, and reprocessing old materials into useable raw materials.
- g) **Recyclable Oil** – Lubricating oil and hydraulic fluid which meets the requirements of California Health and Safety Code (CH&SC), section 25250.1(b) which includes:
  - The oil meets the standards of purity set forth in CH&SC 25250.1(a)(3)(B):
    - i. Flash Point > 100F
    - ii. Total lead < 50 ppm
    - iii. Total arsenic < 5 ppm
    - iv. Total chromium < 10 ppm
    - v. Total cadmium < 2 ppm
    - vi. Tested to confirm total halogen < 1,000ppm
    - vii. Total PCBs < 2 ppm
  - The oil has not been mixed with listed hazardous waste.
  - The oil is not classified as hazardous per 40 CFR.
- h) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

#### 6. RESPONSIBILITIES

##### 6.1 HWF Leader/Disposer

- a) Confirms material meets recycling criteria.
- b) Places material on pallet in designated area for recycling.
- c) Schedules pick up with designated vendor when sufficient volume dictates.

- d) If at 90 day site manifests and sends to 1 year TSDF.

## 7. PROCEDURES

The following procedure shall be used to recycle all oil and fuels on U.S. Naval Bases in San Diego.

- a) Oil and Fuel are collected at pier or shore activities per SOP's HW-05-003 and HW-05-004.
- b) Conduct halogen detection test before the oil container is consolidated, placed in storage or moved from the consolidation area and perform water content test if halogens are <1000ppm.
- c) Consolidate small containers of oil and fuel in appropriate containers in designated consolidation areas per SOP HW-05-032.
- d) Label containers in accordance with this SOP.
- e) Contact designated vendor or Shaw IWOW Chemist when sufficient volume is attained to arrange disposal.
- f) Oversee removal of recyclable material.
- g) Properly document transfer of containers with a Waste Acceptance Form or BOL/manifest as appropriate.

### 7.1 Recyclable Oil

#### 7.1.1 Turn-In Procedure

When the driver picks up the oil, be sure there is a waste turn-in form. It will show the quantity, type of oils and the date of the pick-up. If a form is not completed, one is filled out with the assistance of the customer, and a copy left with the customer. Follow SOP HW-05-003 or HW-05-004 for pickups.

#### 7.1.2 Labeling

In California, recyclable oil is a hazardous waste until it's at the refinery. Affix a complete HW label to the drum. The contents section should include the words, "Used Oil." Mark the "Toxic" box and fill in the accumulation start date (see enclosure 1).

#### 7.1.3 Test for Halogens

CA Health and Safety Code section 25250.1 requires used oil handlers (e.g. generators, used oil collection centers, transporters, transfer facilities and used oil-recycling facilities) to determine that the total halogen content of each used oil shipment does not exceed 1000 ppm. Used oil containing more than 1000 ppm total halogens is presumed to have been mixed with halogenated HW and must be managed as a RCRA HW unless it can be demonstrated that such mixing has not occurred.

- a) Upon receipt of oil at the HWF each drum will be tested for halogens using a halogen detector (sniffer) and/or Chlor-D-Tect kit as appropriate.
- b) For Halogen Detector operation, refer to the instructions located on the side of the detection unit. The probe of the Halogen Detector should be placed within two inches of the surface of the oil and held for ten seconds to take a reading.

- c) Instructions for the Clor-D-Tect tests kits are located inside each kit.
- d) If an oil container tests positive for halogens, it will be assumed to exceed 1000 ppm and managed as a HW. Check with the Profile Specialist for assignment of the proper profile number. Discuss the test result with generating activity to determine the source of the halogen contamination. Modify the Waste Turn-In Form and Label to reflect the changes. If an oil container, identified by the generating activity as recyclable oil tests negative for halogens it will be managed as recyclable oil.
- e) Prior to each shipment or pumping of recyclable oil, a composite sample of all drums will be tested for halogen content using a Clor-D-Tect kit. If the composite result is > 1000ppm, additional composite tests are done by dividing the shipment in halves, quarters, etc. to determine which individual container(s) tests >1000 ppm. Container(s) verified >1000 ppm will be removed from the shipment and managed as hazardous waste. Refer to step (c) above for additional steps to be taken for the contaminated oil.

#### **7.1.4 Record Keeping**

The same record keeping and tracking requirements for Hazardous Waste also apply to recyclable wastes. Follow SOP HW-05-028.

### **7.2 Reclaimable Fuels**

#### **7.2.1 Turn-In Procedure**

When the driver picks up the fuel, be sure there is a waste turn-in form. It will show the quantity, type of fuel, the date of the drum, and the date of the pick-up. If a form is not completed, one is filled out with the assistance of the customer, and a copy left with the customer. Follow SOP HW-05-003 or HW-05-004 for pickups.

#### **7.2.2 Label**

Affix a complete HW label to the drum. The contents section should contain the words JP-5 or Diesel. Mark the "Toxic" box and fill in the start date. (see enclosure 2)

#### **7.2.3 Transfer to IWOW**

Upon receipt of the waste, each container is subject to the same tracking requirements as HW. See SOP HW-05-028. A new Waste Acceptance Form (WAF) is generated for the material to be treated at the IWOW plant. The IWOW Chemist will review the WAF and visually inspect each container to be treated. Afterward, the HWF Supervisor and the IWOW Chemist will determine a date for the waste to be transferred to the IWOW plant for disposal.

#### **7.2.4 Record Keeping**

The same record keeping and tracking requirements for Hazardous Waste also apply fuel. Follow SOP HW-05-028.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Toner Cartridge

**References:** (a) Executive Order 13101

**Enclosures:** None

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### 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel at the U.S. Naval Bases in San Diego with the guidelines for acceptance of spent or used Toner Cartridges. Further, this SOP contains local turn-in and recycling of spent or used Toner Cartridges.

### 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. As part of this service, the Service Provider will research, document, and recommend the most economical recycling option available to provide disposal and recycling services. All revenue received from the recycling of the waste shall be returned to the Government.

### 3.0 SCOPE

This procedure defines the process for recycling of spent or used toner cartridges and is guidance for HWF personnel

### 4.0 ACTION

This document applies to HWF personnel who manage used or spent toner cartridges

### 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Hazardous Material** – (HM) is any material or substance, which even in normal use, poses a risk to health, safety, or the environment.
- d) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- e) **Recycling**- system of collecting, sorting, and reprocessing old materials into useable raw materials.
- f) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Disposers (Disposers)

- a) Collection of used toner cartridges
- b) Placement and packing on pallet
- c) Shipment to Station recycling centers

## 7.0 PROCEDURES

The following procedure shall be used to recycle all toner cartridges on U.S. Naval Stations in San Diego

- a) Toner cartridges are collected at pick up points
- b) Inspect to make sure they're intact
- c) Only Dry ink type toner is accepted
- d) Should be repacked in manufacturer's box
- e) Packed on pallets
- f) Shipped to station recycling centers on U.S Naval Installations
- g) Properly document and track transaction

Disposers will complete a Waste turn-in form with generator activity and date. This form should also include proper profile (RT55), type service, disposition, and weight (in lbs.).

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## STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Materials Contingency and Emergency Response Plan

Hazardous Waste Accumulation Site, BLDG 145A, Naval Amphibious Base (NAB) Coronado

**Reference:** (a) Code of Federal Regulations, 40 CFR 264, subpart D  
(b) CA Code of Regulations, Title 22, Chapter 14, Article 4  
(c) CA Health & Safety Code, Div. 20, Chapter 6.95  
(d) Spill Cleanup Procedures, SOP HW-05-007  
(e) EPCRA §302 Extremely Hazardous Substances

**Enclosures:** (1) CSW-049 (Emergency Coordinator List)  
(2) CSW-051 (Emergency Contingency Plan Site Map)

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### 1.0 PURPOSE

This Emergency Contingency Plan is developed to meet the requirements of references (a), (b), and (c), as applicable to the operations conducted by the Service Provider on contract no. N62473-10-D-4009. This plan applies to all HWF employees for emergencies, occurring at the HWF or at other locations where HWF employees are conducting Hazardous Waste (HW) operations unless superseded by higher authority.

### 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides HW and HM collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

- a) NAB HWF is a limited access facility that operates 7:30 to 11:00 M-F. It is located on the southern boundary of the city of Coronado, CA on the western edge of the San Diego Bay. Entrances to the installation include three gates located off the Silver Strand Highway.
- b) This Standard Operating Procedure (SOP) was developed to provide guidance to Service Provider personnel. HW is routinely generated from operations such as machining, painting, metal surface treatment, and maintenance and repair of vehicles, ground support equipment and small boats. Wastes typically handled at the HWF include paints, solvents, thinners, corrosives, reactives, fuels, lubricants, hazardous debris, lamps, and batteries.
- c) The Federal Fire Department (Fed Fire) provides both fire protection and hazardous material and waste spill response actions. Furthermore, Fed Fire is the first responder to any hazardous substance incident which requires immediate response. NAB also maintains a full-time police department to fulfill security and criminal investigation requirements. Fed Fire provides initial

emergency medical services, with follow-up care for civilian employees provided by Sharp Coronado Hospital.

### 3.0 SCOPE

This procedure defines the required actions in case of an emergency or spill at NAB Coronado.

### 4.0 ACTION

This procedure applies to all Service Provider personnel at NAB Coronado.

### 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- d) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- e) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

### 6.0 RESPONSIBILITIES

**6.1 Emergency Coordinator** – each facility that accumulates hazardous waste and/or maintains hazardous material inventories over the Threshold Planning Quantities for EPCRA Extremely Hazardous Substances (reference e), has designated employees who are Emergency Coordinators. These employees have the authority and responsibility for coordinating all emergency response actions.

The names of persons qualified to be Emergency Coordinators for each HWF are found in Enclosure 1 which is posted on the facility community bulletin board. This list also includes their home telephone numbers. In the case of a release of a hazardous material or waste, fire, or other emergency, the Emergency Coordinator will:

- a) Identify the nature of the incident and appropriate actions to be taken to mitigate the problem.
- b) Notify required personnel of any danger using the procedures listed herein.
- c) Notify Fed Fire as required by the severity of the incident or emergency. (spills > 5-gallons and any fire)
- d) Report the spill to the CNRSW Environmental staff responsible for oversight regarding both internal and external reporting.
- e) Coordinate and direct trained HWF personnel regarding proper control and clean-up of the release.

**6.2 HWF Supervisor (Supervisor)** – shall ensure all HWF personnel receive proper and adequate training in hazardous substance/waste spill response clean-up procedures and HWF general emergency procedures. The Supervisor shall also ensure that required personal protective equipment (PPE) is available and used by all employees involved in emergency response and spill

cleanup; ensure that HWF emergency equipment is properly maintained and in working condition; ensure that communication systems, including fire alarms, radios, telephones, and personal notification devices are in working order; ensure that all employees are thoroughly familiar with the contents of this plan; conduct regular safety training; be familiar with the duties of the Emergency Coordinator and function as such when required; and ensure that this SOP is followed.

**6.3 HWF Leaders/Disposers** - shall be familiar with this SOP; immediately report releases of hazardous material or waste, fire or other emergencies to the Supervisor &/or Emergency Coordinator; follow the directions of the Emergency Coordinator; warn others in the area of the emergency; attend emergency procedure and spill response training; perform spill clean-up operations in accordance to SOP HW-05-007; ensure that all required PPE is worn when handling hazardous substances/waste; stand-by to assist other response agencies as required; perform all work in a safe and responsible manner.

## **7.0 PROCEDURE**

**7.1 Evacuation Procedures:** Notify personnel to evacuate by use of the evacuation alarm, air horn, cell phone, or shouting. Notify Fed Fire as appropriate [see 6.1 c)]. Employees will evacuate through the nearest exit (Enclosure 2). The Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or, in their absence, the discoverer assumes responsibility until the Federal Fire Department arrives.

**7.2 Notification Procedures:** In the event of an emergency situation including: fire; explosion; injury; release or threatened release of hazardous material; and hostage situations, the Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or in their absence, the discoverer will notify the following agencies:

- a) **Federal Fire Department**, telephone on-base 9-911. Upon notification/arrival on scene, the Federal Fire Department response person becomes the Emergency Coordinator and is responsible for coordinating all emergency response efforts. This responsibility includes ambulance dispatch and communication with Navy medical centers, local police departments, and local fire departments.
- b) **Designated Government Representative (NAVFAC SW)**. Contact the DGR at (619) 532-2058 within 30 minutes after contacting Fed Fire.
- c) **Commanding Officer – Naval Base Coronado**, through the Command Duty Officer (CDO) (619) 778-4862.
- d) **Commander Navy Region Southwest Installation Program Director Office**. The CNRSW Environmental staff is responsible for oversight regarding both internal and external reporting. The CNRSW telephone numbers are:
  - CNRSW Environmental NASNI Site Team Office: (619) 545-4944;
  - CNRSW Environmental Duty Officer: (619) 954-4331 (cell phone) or (619) 965-6759 (pager) for calls after 1600hrs and on weekends and holidays.

- e) **State Office of Emergency Services**, The State Office of Emergency Services (800-852-7550) will be contacted immediately by Southwest Region Environmental upon notification by the emergency coordinator that a release or emergency situation requiring notification has occurred.
- f) **Information Required:** For spill response, the Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or, in their absence, the discoverer shall gather and have available to report to the Federal Fire Department and the DGR NAVFAC SW, the following information:
- Exact location of spill or potential spill including: base building number; area of building; and media affected (soil, water, air, and pavement);
  - Hazardous material involved;
  - Quantity spilled or that could potentially spill;
  - Potential hazard presented by the spill (toxic, flammable, etc.);
  - Date and time of spill;
  - Source and cause of spill;
  - Immediate actions taken;
  - Spill related injuries; and
  - Reporting person's name and telephone number.

**Note: discharges of hazardous materials to secondary containment and hazardous material discharges controlled onsite are not considered releases. As such, discharges of this nature do not activate this contingency plan and may not be subject to the notification requirements outlined in 22 CCR 66264.56.**

### 7.3 Emergency Procedures:

- a) **Main concerns:** Fire, explosion, injuries, and release or threatened release of hazardous waste, materials or substances. **Other concerns:** Hostage Situations.
- b) **Fire/Explosion:** Employees will evacuate following paragraph (7.1) above. Notify Fed Fire as appropriate [see 6.1 c)]. If safe, Emergency Coordinator or Supervisor will shut off power and attempt to control fire using an appropriate local fire extinguishing agent.
- c) **Injuries:** Begin notification procedures in paragraph (7.2) and perform first aid/CPR on injured persons until medical assistance arrives.
- d) **Spill/Release to Groundwater, Surface Water, Air, or Soil:** Employees will evacuate following paragraph (7.1) above. Notify Fed Fire as appropriate [see 6.1 c)]. The Emergency Coordinator will immediately assess the character, source, amount, and extent of the release. At the discretion of the Emergency Coordinator, the Emergency Coordinator and Spill Response Team Members located in the HWF Complex will don appropriate personal protective equipment (PPE) and attempt to control and contain a small spill. If the Emergency Coordinator determines it appropriate, he/she will cease spill response efforts, evacuate response team members following paragraph (7.1) above.
- e) **Response to Container Spills and Leakage:** The procedures used to mitigate a container spill or leak at the HWF facility are as follows:

- Control further spread of leak or spill with dikes or berms;
  - Control the source of the leak;
  - Clean-up and containerize spilled material using absorbent, neutralizer, or coagulant, as necessary;
  - Repair or overpack failed container; and
  - Report incident in accordance with notification procedures outlined in Paragraph (7.2) of the Contingency Plan.
- f) **Timing:** A visual inspection of any hazardous substance release will be conducted by operators as directed by the emergency coordinator. The above listed control and clean-up procedures will be conducted as soon as the affected areas(s) are declared safe for entry for the clean-up crew and in as timely a manner as is necessary to prevent overflow of containment areas.
- g) **Hostage Situations:** Follow notification procedures in paragraph (7.2), above.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Materials Contingency and Emergency Response Plan  
Hazardous Waste Accumulation Site, BLDG 375, Point Loma Naval Complex  
(SUBASE)

**Reference:** (a) Code of Federal Regulations, 40 CFR 264, subpart D  
(b) CA Code of Regulations, Title 22, Chapter 14, Article 4  
(c) CA Health & Safety Code, Div. 20, Chapter 6.95  
(d) Spill Cleanup Procedures, SOP HW-05-007  
(e) EPCRA §302 Extremely Hazardous Substances

**Enclosures:** (1) CSW-050 (Emergency Coordinator List)  
(2) CSW-048 (Emergency Contingency Plan Site Map)

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### 1.0 PURPOSE

This Emergency Contingency Plan is developed to meet the requirements of references (a), (b), and (c), as applicable to the operations conducted by the Service Provider under contract N62473-10-D-4009. This plan applies to all Hazardous Waste Facility (HWF) employees for emergencies occurring at the HWF or at other locations where HWF employees are conducting Hazardous Waste (HW) operations unless superseded by higher authority.

### 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities, and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials.

The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. Included in these services is the management of HW. HW is routinely generated from operations such as machining, painting, metal surface treatment, and maintenance and repair of vehicles, ground support equipment and small boats. HW typically handled at the HWF includes paints, solvents, thinners, corrosives, reactives, fuels, lubricants, hazardous debris, lamps, and batteries. This Standard Operating Procedure (SOP) was developed to provide support to Service Provider personnel providing the specified CSW services. The Federal Fire Department (Fed Fire) provides both fire protection and HW/HM spill response actions.

NBPL HWF is a limited access facility that operates 0730 to 1600 M-F. It is located on the western edge of the San Diego Bay. Fed Fire is the first responder to any hazardous substance incident which requires immediate response. SUBASE also maintains a full-time police department to fulfill security and criminal investigation requirements. Fed Fire provides initial

emergency medical services, with follow-up care for civilian employees provided by Scripps Mercy Hospital.

### 3.0 SCOPE

This procedure defines the required actions in case of an emergency or spill at SUBASE.

### 4.0 ACTION

This procedure applies to all Service Provider personnel at SUBASE.

### 5.0 DEFINITIONS

- a) **HWF Facility – (HWF)** a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW-** Containerized Solid Waste
- c) **Hazardous Material – (HM)** is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- d) **Hazardous Waste – (HW)** any waste as defined in 40 CFR §261.3 and Title 22 CCR §66261.3.
- e) **Service Provider –** The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

### 6.0 RESPONSIBILITIES

**6.1 Emergency Coordinator –** each facility that accumulates hazardous waste and/or maintains hazardous material inventories over the Threshold Planning Quantities for EPCRA Extremely Hazardous Substances (reference e) has designated employees who are Emergency Coordinators. These employees have the authority and responsibility for coordinating all emergency response actions.

The names of persons qualified to be Emergency Coordinators for each HWF are found in Enclosure 1 which is posted on the facility community bulletin board. This list also includes their home telephone numbers. In the case of a release of a hazardous material or waste, fire, or other emergency, the Emergency Coordinator will:

- a) Identify the nature of the incident and appropriate actions to be taken to mitigate the problem.
- b) Notify required personnel of any danger using the procedures listed herein.
- c) Notify Fed Fire as required by the severity of the incident or emergency. (spills > 5-gallons and any fire)
- d) Report the spill to the CNRSW Environmental staff responsible for oversight regarding both internal and external reporting.
- e) Coordinate and direct trained HWF personnel regarding proper control and clean-up of the release.

**6.2 HWF Supervisor (Supervisor) –** shall ensure all HWF personnel receive proper and adequate training in hazardous substance/waste spill response clean-up procedures and HWF general emergency procedures. The Supervisor shall also ensure that required personal protective equipment (PPE) is available and used by all employees involved in emergency response and spill

cleanup; ensure that HWF emergency equipment is properly maintained and in working condition; ensure that communication systems, including fire alarms, radios, telephones, and personal notification devices are in working order; ensure that all employees are thoroughly familiar with the contents of this plan; conduct regular safety training; be familiar with the duties of the Emergency Coordinator and function as such when required; and ensure that this SOP is followed.

**6.3 HWF Leaders/Disposers** - shall be familiar with this SOP; immediately report releases of hazardous material or waste, fire or other emergencies to the Supervisor &/or Emergency Coordinator; follow the directions of the Emergency Coordinator; warn others in the area of the emergency; attend emergency procedure and spill response training; perform spill clean-up operations in accordance to SOP HW-05-007; ensure that all required PPE is worn when handling hazardous substances/waste; stand-by to assist other response agencies as required; perform all work in a safe and responsible manner.

## **7.0 PROCEDURE**

**7.1 Evacuation Procedures:** Notify personnel to evacuate by use of the evacuation alarm, air horn, cell phone, or shouting. Notify Fed Fire as appropriate. [see 6.1 c)] Employees will evacuate through the nearest exit (see Enclosure 2). The Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or, in their absence, the discoverer assumes responsibility until the Federal Fire Department arrives.

**7.2 Notification Procedures:** In the event of an emergency situation including: fire; explosion; injury; release or threatened release of hazardous material; and hostage situations, the Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or in their absence, the discoverer will notify the following agencies:

- a) **Federal Fire Department**, telephone on-base 9-911. Upon notification/arrival on scene, the Federal Fire Department response person becomes the Emergency Coordinator and is responsible for coordinating all emergency response efforts. This responsibility includes ambulance dispatch and communication with Navy medical centers, local police departments, and local fire departments.
- b) **Designated Government Representative (NAVFAC SW)**. Contact the DGR at (619) 532-2058 within 30 minutes after contacting Fed Fire.
- c) **Navy Region Southwest Environmental Office**. The CNRSW Environmental staff is responsible for oversight regarding both internal and external reporting. The CNRSW telephone numbers are:
  - CNRSW Environmental Pt Loma Site Team Office: (619) 553-8566.
  - CNRSW Environmental Duty Officer: (619) 954-4331 (cell phone) or (619) 965-6759 (pager) for calls after 1600hrs and on weekends and holidays.
- d) **State Office of Emergency Services**, The State Office of Emergency Services (800-852-7550) will be contacted immediately by Southwest Region Environmental upon notification by the emergency coordinator that a release or emergency situation requiring notification has occurred.

- e) **Information Required:** For spill response, the Emergency Coordinator, alternate Emergency Coordinator, Supervisor, or, in their absence, the discoverer shall gather and have available to report to the Federal Fire Department, the Service Provider office, and the PWC Duty Desk the following information:
- Exact location of spill or potential spill including: base building number; area of building; and media affected (soil, water, air, and pavement);
  - Hazardous material involved;
  - Quantity spilled or that could potentially spill;
  - Potential hazard presented by the spill (toxic, flammable, etc.);
  - Date and time of spill;
  - Source and cause of spill;
  - Immediate actions taken;
  - Spill related injuries; and
  - Reporting person's name and telephone number.

**Note: discharges of hazardous materials to secondary containment and hazardous material discharges controlled onsite are not considered releases. As such, discharges of this nature do not activate this contingency plan and may not be subject to the notification requirements outlined in 22 CCR 66264.56.**

### 7.3 Emergency Procedures:

- a) **Main concerns:** Fire, explosion, injuries, and release or threatened release of hazardous waste, materials or substances. **Other concerns:** Hostage Situations.
- b) **Fire/Explosion:** Employees will evacuate following paragraph (7.1) above. Notify Fed fire as appropriate. [see 6.1 c)] If safe, Emergency Coordinator or Supervisor will shut off power and attempt to control fire using an appropriate local fire extinguishing agent.
- c) **Injuries:** Begin notification procedures in paragraph (7.2) and perform first aid/CPR on injured persons until medical assistance arrives.
- d) **Spill/Release to Groundwater, Surface Water, Air, or Soil:** Employees will evacuate following paragraph (7.1) above. Notify Fed Fire as appropriate. [see 6.1 c)] The Emergency Coordinator will immediately assess the character, source, amount, and extent of the release. At the discretion of the Emergency Coordinator, the Emergency Coordinator and Spill Response Team Members located in the HWF Complex will don appropriate personal protective equipment (PPE) and attempt to control and contain a small spill. If the Emergency Coordinator determines it appropriate, he/she will cease spill response efforts, evacuate response team members following paragraph (7.1) above.
- e) **Response to Container Spills and Leakage:** The procedures used to mitigate a container spill or leak at the HWF facility are as follows:
- Control further spread of leak or spill with dikes or berms;
  - Control the source of the leak;

- Clean-up and containerize spilled material using absorbent, neutralizer, or coagulant, as necessary;
  - Repair or overpack failed container; and
  - Report incident in accordance with notification procedures outlined in Paragraph (7.2) of the Contingency Plan.
- f) **Timing:** A visual inspection of any hazardous substance release will be conducted by operators as directed by the emergency coordinator. The above listed control and clean-up procedures will be conducted as soon as the affected areas(s) are declared safe for entry for the clean-up crew and in as timely a manner as is necessary to prevent overflow of containment areas.
- g) **Hostage Situations:** Follow notification procedures in paragraph (7.2), above.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Personal Protective Equipment (PPE)

**Reference:** (a) OSHA 29 CFR 1910

**Enclosures:** (1) CSW - 052 (Personal Protective Equipment Guidelines)  
(2) CSW - 053 (Respiratory Protection Guidelines)  
(3) CSW - 054 (Heat Stress Guidelines)  
(4) CSW - 055 (Cold Stress Guidelines)  
(5) CSW - 056 (Hearing Conservation Guidelines)  
(6) CSW - 057 (Medical Surveillance Program)  
(7) CSW - 058 (Job Hazard Analysis)

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## 1.0 PURPOSE

This Program provides guidance for properly selecting and effectively utilizing personal protective equipment (PPE).

## 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste and Hazardous Material collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of HW. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. Included in these services is the management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. OSHA has established regulations governing the protection of HW workers.

## 3.0 SCOPE

This Program establishes Guidance Procedures for the selection, inspection, donning, doffing, proper fitting, maintenance and storage of chemical protective equipment.

## 4.0 ACTION

Procedures for the above information are outlined in the **Service Providers Health and Safety Guidance Manual (Guidance Manual)**. The **Guidance Manual (Enclosures 1-7)** should be referenced for Procedures on the following:

- a) Levels of protection and performance criteria (for the Navy Southwest Region Project, PPE levels will NOT go above a level C);
- b) Limitation of protective clothing;
- c) Selection criteria and methods;
- d) Inspection procedures;
- e) Donning, doffing and proper fitting; and,
- f) Maintenance and storage.

## 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- d) **Hazardous Waste** – (HW) any waste as defined in 40 CFR § 261.3 and Title 22 CCR §66261.3.
- e) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

It is the responsibility of the Service Provider to select and properly use the appropriate PPE for the work being done.

### 6.1 CSW Manager (CM)

The CM is responsible for communicating and enforcing the Procedures specified in the Service Provider's **Guidance Manual**. Responsibility for selecting appropriate protective equipment and clothing is jointly held between the CM and the Service Provider's Health and Safety Department. It is the CM's responsibility to confer with the Health and Safety Department to determine necessary criteria and to properly select appropriate protective clothing. All other aspects of protective equipment use rests with the HWF Supervisor/Leader. The CM:

- a) Communicates and enforces the procedures specified in the **Guidance Manual**.
- b) Advises staff of any changes to the **Guidance Manual**.
- c) Develops with Health & Safety any site-specific PPE SOP's.
- d) Makes sure the staff is trained in all of the above.

### 6.2 HWF Supervisor (Supervisor)

- a) Reports to and assists the CM.
- b) Is responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedures and guidance established in the SOP.
- e) Assists in training HWF personnel on the proper use of PPE and response equipment.
- f) Ensures unsafe work conditions and operational deficiencies are corrected expeditiously.

### 6.3 HWF Leader/Disposer (Leader/Disposer)

- a) Reports to and assists the Supervisor as required
- b) Understands and complies with the procedures and guidance established in the instruction
- c) Performs all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others.

- d) Reads the Guidance Manual and Sop's, understands the tasks at hand and the hazards, and takes the necessary health and safety precautions.
- e) Reports observed and perceived non-compliance with this instruction to the Supervisor.

## **7.0 APPLICATION**

This Policy applies throughout all CSW operations.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Waste Characterization

**Reference:** (a) CCR Title 22 §66261  
(b) 40 CFR §261

**Enclosures:** (1) CSW-059 (Hazardous Waste Characterization Flow Chart)

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## 1.0 PURPOSE

The purpose of this SOP is to establish standard operating procedures providing a better understanding of characterizing waste.

## 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two 90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of HW. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. Included in these services is the management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. Title 22 of the California Code of Regulations (Title 22 CCR) outlines requirements for the proper characterization of waste as either hazardous, non hazardous, or exempted/ excluded.

## 3.0 SCOPE

This instruction explains waste characterization and provides guidance for Service Provider personnel.

## 4.0 ACTION

This procedure applies to Service Provider personnel who have potential hazardous waste to analyze and classify.

## 5.0 DEFINITIONS

a) **Waste-** Any discarded material of any form (liquid, semi-solid, solid, or gaseous) which is relinquished, recycled, stored for future disposal or recycling, or is an inherently waste-like material (such as certain dioxin containing wastes) that is not specifically excluded by 22 CCR §66261.4 (a) or (e), or by Health and Safety Code section 25143.2 (b) or (d). Material that can still be used for its intended purposes is not a waste.

- b) **Hazardous Waste.** A solid waste or combination of solid wastes, that because of its quantity, concentration, or physical, chemical, or infectious characteristics, may cause or contribute to a serious illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed. Also any waste that meets the definition of a hazardous waste as defined in 22 CCR §66261 and/or 40 CFR §261.
- c) **Solid Waste.** Anything which can no longer be used for its intended purpose and is being discarded. (Note the term “Solid Waste” does not refer to the physical state; a solid waste can be solid, liquid, semisolid, or containerized gas).
- d) **Municipal Solid Waste.** All putrescible (capable of decaying) and not putrescible solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction waste, etc.; provided that such wastes do not contain soluble pollutants in concentrations which exceed applicable water quality objectives.
- e) **Inert Waste.** Wastes that do not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives.
- f) **Designated Waste.** Non-hazardous waste which consists of or contains pollutants, which under ambient environmental conditions at the waste management unit, could be released at concentrations in excess of applicable water quality objectives, or which could cause degradation of water of the state.
- g) **Excluded Waste.** Wastes that are specifically excluded in accordance with 22 CCR §66261.4
- h) **HWF Facility – (HWF)** a consolidation, storage, and transfer facility for HW and HM.
- i) **CSW-** Containerized Solid Waste
- j) **Service Provider –** The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

It is the responsibility of Service Provider personnel to characterize and manage material appropriately.

### 6.1 The HWF Supervisor (Supervisor) shall;

- a) Report to and assist the CSW Manager (CM);
- b) Be responsible for overall compliance of the HWF with this SOP;
- c) Report any non-compliance with this SOP to the CM;
- d) Ensure that HWF personnel are proficiently trained on the procedures and guidance established in this SOP;
- e) Train HWF personnel of the proper use of PPE and response equipment; and
- f) Ensure unsafe work conditions and operational deficiencies are corrected.

**6.2 The HWF Leader/Disposer (Leader/Disposer) shall:**

- a) Report to and assist the Supervisor as required;
- b) Understand and comply with the procedures and guidance established in the instruction;
- c) Perform all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others;
- d) Read the hazardous waste Material Safety Data Sheet (MSDS), understand the associated hazards, and take the necessary health and safety precautions; and
- e) Report observed and perceived non-compliance with this instruction to the Supervisor.

**7.0 PROCEDURE**

The following procedure should be used to properly characterize wastes and to determine what profile the waste will fit under. If the waste does not fit under any existing profile, then refer to SOP HW-05-022.

Using Enclosure 1, the Hazardous Waste Characterization Flow Chart and the waste characterization procedure below, determine the name and source of the material offered for disposal and determine whether or not the waste is hazardous.

**Step 1: Is the material a waste?**

- Is it being discarded or recycled because it will not be used for its initial intended purpose?
- Is it inherently waste-like (looks like waste and is being managed (stored) like waste).

If yes

**Step 2: Is it excluded or exempted?**

- Listed in Title 22 CCR 66261.4
- Otherwise excluded from regulation
  - State of California: HSC 25124, HSC 25141.5(b)(2)(B), HSC 25143.2, Title 22: 66260.10, 66261.4(a)
  - Federal: 40 CFR 261.2, 40 CFR 261.24(a)

If excluded or exempt, go to step 6. If not, go to step 3.

**Step 3: Is the waste listed hazardous waste?**

- Hazardous Waste from Non-Specific Sources are assigned "F"-codes, 40 CFR 261.31
- Hazardous Waste from Specific Sources are assigned "K"-codes, 40 CFR 261.32
- Unused or Off-Specification Chemicals are assigned "P" or "U"-codes, 40 CFR 261.33

**Step 4: Was the waste a derived-from, or a mixture of, listed waste and inert materials?**

- Waste resulting from the treatment or management of a listed hazardous waste is also a listed hazardous waste regardless of its hazardous characteristics or lack thereof.

- Listed waste mixed with inert materials such as water, soil or absorbents must be managed as listed waste.

**Step 5: Does the waste have a hazardous characteristic(s)?**

- Ignitable – “D001” 40 CFR 261.21
- Corrosive – “D002” 40 CFR 261.22 - California regulated only if it is a solid which has a pH <2 or >12.5 when mixed with water.
- Reactive – “D003” 40 CFR 261.23
- Toxic – “D004 – D043” 40 CFR 261.24 Chemical concentration specific using TCLP testing
  - California regulated if the D004 – D043 concentration is met using WET testing
  - An additional list of compounds which can be California toxic based on WET test CCR 66261.24(a)(2)
  - California toxicity applies to any compound with LD50s/LC50 as follows:
    - Oral LD50 <2,500 mg/kg
    - Dermal LD50 <4,300 mg/kg
    - Inhalation LC50 <10,000 mg/kg
    - Aquatic Toxicity <500 mg/L
  - Sixteen compounds known to be carcinogens are classified as California toxic
  - Any other material, determined by experience or testing, to be toxic are also classified as California hazardous.

**Step 6: Apply appropriate codes & classification.**

- Exempt or excluded waste – meets the definition of a hazardous waste but is specifically excluded or exempt from regulation.
- RCRA Waste - meets the Federal definition of hazardous waste and is assigned a RCRA waste code(s).
- Non-RCRA Waste - meets one of the California definitions of hazardous waste, but not the Federal one and is not regulated by the DOT. (*California Regulated Only*).
- Non-Hazardous Waste – Does not meet Federal or State hazardous definitions.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Waste Pre-Acceptance

**Reference:** (a) Title 22 CCR §66261  
(b) Title 40 CFR §261

**Enclosures:** (1) CSW-006 (Hazardous Waste Profile)

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## 1.0 PURPOSE

The purpose of this SOP is to establish standard operating procedures for Pre-Acceptance approval of wastes managed by the Service Provider. Pre-acceptance approval for wastes managed by the Service Provider or shipped to any disposal facility is required, both by permits to operate the facilities and by the Service Provider's commitment to provide safe and compliant treatment and disposal service. In general, a waste will be approved if it meets the following conditions:

- a) It is listed in the facility HW Permit, and
- b) the waste can be safely and legally handled, and
- c) a waste category and CLIN is assigned to the waste.

## 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste Facilities, and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. Included in these services is the management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The Environmental Protection Agency has established regulations governing the management of HW. Title 22 of the California Code of Regulations (Title 22 CCR) outlines requirements for the proper characterization of waste as either hazardous, non hazardous, or exempted/ excluded.

### 3.0 SCOPE

This instruction explains waste characterization and provides guidance for Service Provider personnel.

### 4.0 ACTION

This Policy applies to all wastes that are collected, handled, transported, stored, treated or transferred. The Service Provider is the Office of Record for all waste approval paperwork. The original approval forms will be maintained as required by applicable filing and records retention rules.

### 5.0 DEFINITIONS

- a) **Waste-** Any discarded material of any form (liquid, semi-solid, solid, or gaseous) which is relinquished, recycled, stored for future disposal or recycling, or is an inherently waste-like material (such as certain dioxin containing wastes) that is not specifically excluded by 22 CCR 66261.4 (a) or (e), 40 CFR 261.4 (a) or (e), or by Health and Safety Code section 25143.2 (b) or (d). Material that can still be used for its intended purposes is not a waste.
- b) **Hazardous Waste.** A solid waste or combination of solid wastes, that because of its quantity, concentration, or physical, chemical, or infectious characteristics, may cause or contribute to a serious illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed. Even if the waste is excluded by RCRA or does not exhibit federal hazardous waste by California's statutes and regulations.
- c) **Solid Waste.** Anything which can no longer be used for its intended purpose and is being discarded. (Note the term "Solid Waste" does not refer to the physical state; a solid waste can be solid, liquid, semisolid, or containerized gas.)
- d) **Municipal Solid Waste.** All putrescible (capable of decaying) and non-putrescible solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction waste, etc.; provided that such wastes do not contain soluble pollutants in concentrations which exceed applicable water quality objectives.
- e) **Inert Waste.** Wastes that do not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives.
- f) **Designated Waste.** Non-hazardous waste which consists of or contains pollutants, which under ambient environmental conditions at the waste management unit, could be released at concentrations in excess of applicable water quality objectives, or which could cause degradation of water of the state.
- g) **Excluded Waste.** Wastes that are specifically excluded in accordance with 22 CCR 66261.4
- h) **HWF Facility – (HWF)** a consolidation, storage, and transfer facility for HW and HM.
- i) **CSW-** Containerized Solid Waste

- j) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

It is the responsibility of the Service Provider to characterize and manage material appropriately.

### 6.1 The Hazardous Waste Facility Supervisor (Supervisor) shall;

- a) Report to and assist the CSW Manager (CM);
- b) Be responsible for overall compliance of the HWF with this SOP;
- c) Report any non-compliance with this SOP to the CM;
- d) Ensure that HWF personnel are proficiently trained on the procedures and guidance established in this SOP; and
- e) Train HWF personnel in the proper use of PPE and response equipment.

### 6.2 Hazardous Waste Facility Leader/Disposer shall;

- a) Report to and assist the Supervisor as required;
- b) Understand and comply with the procedures and guidance established in the instruction;
- c) Perform all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others;
- d) Read the hazardous waste Material Safety Data Sheet (SDS), understand the associated hazards, and take the necessary health and safety precautions; and
- e) Report observed and perceived non-compliance with this instruction to the Supervisor.

## 7.0 PROCEDURE

The following procedures should be used to properly profile wastes in the case that a new waste stream is encountered:

- a) When a request for disposal of a new waste is received, and it is determined that a profile doesn't already exist for the waste, the following information must be compiled by the generator:
  - Description of the waste
  - Description of the process generating the waste
  - Copies of SDS's, if applicable
  - Lab analysis results
- b) At this point, CSW personnel will assist the generating activity to complete all sections of the Hazardous Waste Profile (Enclosure 1). SOP HW-05-021 outlines the process for waste characterization.
- c) If the waste is suitable for waste water treatment the, the profile is sent for review by the appropriate IWOW/BOWTS personnel for suitability of treatment. If acceptable, the profile is then coded to reflect acceptance by the proper treatment system.
- d) If not acceptable by the IWOW/BOWTS system, the profile is compared to existing waste categories, and the best description is selected along with the least expensive disposal option. If

the profile will be disposed of through DLA DS and does not fit within any existing category, the information needs to be submitted to the COR for additional categorization.

- e) Once the profile is set, the information is reviewed with the DGR for concurrence before being finalized.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Waste Management

**Enclosures:** 1) CSW-062 (Standard Operating Procedures List)  
2) CSW-080 (CSW List of Enclosures)

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## 1.0 PURPOSE

The purpose of this procedure is to provide guidance on the management of wastes offered for disposition to Service Provider personnel providing environmental services under contract N62473-10-D-4009.

## 2.0 BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste Facilities, and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. Included in these services is the management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The Environmental Protection Agency has established regulations governing the management of HW. Title 22 of the California Code of Regulations (CCR Title 22) outlines requirements for the proper characterization of waste as either hazardous, non hazardous, or exempted/excluded. Standard operating procedures are written to give guidance to Service Provider at all facilities.

## 3.0 SCOPE

This instruction explains waste characterization and provides guidance for Service Provider personnel.

## 4.0 ACTION

This Policy applies to all wastes that are collected, handled, transported, stored, treated or transferred. The Service Provider is the Office of Record for all waste approval paperwork. The original approval forms will be maintained as required by applicable filing and records retention rules.

## 5.0 DEFINITIONS

a) **Waste-** Any discarded material of any form (liquid, semi-solid, solid, or gaseous) which is relinquished, recycled, stored for future disposal or recycling, or is an inherently waste-like material (such as certain dioxin containing wastes) that is not specifically excluded by 22

- CCR 66261.4 (a) or (e), 40 CFR 261.4 (a) or (e), or by Health and Safety Code section 25143.2 (b) or (d). Material that can still be used for its intended purposes is not a waste.
- b) **Hazardous Waste.** A solid waste or combination of solid wastes, that because of its quantity, concentration, or physical, chemical, or infectious characteristics, may cause or contribute to a serious illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported or disposed of, or otherwise managed. Even if the waste is excluded by RCRA or does not exhibit federal hazardous waste by California's statutes and regulations.
  - c) **Solid Waste.** Anything which can no longer be used for its intended purpose and is being discarded. (Note the term "Solid Waste" does not refer to the physical state; a solid waste can be solid, liquid, semisolid, or containerized gas.)
  - d) **Municipal Solid Waste.** All putrescible (capable of decaying) and non-putrescible solid, semi-solid, and liquid wastes, including garbage, trash, refuse, paper, rubbish, ashes, industrial wastes, demolition and construction waste, etc.; provided that such wastes do not contain soluble pollutants in concentrations which exceed applicable water quality objectives.
  - e) **Inert Waste.** Wastes that do not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives.
  - f) **Designated Waste.** Non-hazardous waste which consists of or contains pollutants, which under ambient environmental conditions at the waste management unit, could be released at concentrations in excess of applicable water quality objectives, or which could cause degradation of water of the state.
  - g) **Excluded Waste.** Wastes that are specifically excluded in accordance with 22 CCR 66261.4
  - h) **HWF Facility – (HWF)** a consolidation, storage, and transfer facility for HW and HM.
  - i) **CSW-** Containerized Solid Waste
  - j) **Service Provider –** The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

It is the responsibility of the Service Provider to characterize and manage material appropriately.

### 6.1 The Hazardous Waste Facility Supervisor (Supervisor) shall;

- a) Report to and assist the CSW Manager (CM);
- b) Be responsible for overall compliance of the HWF with this SOP;
- c) Report any non-compliance with this SOP to the CM;
- d) Ensure that HWF personnel are proficiently trained on the procedures and guidance established in this SOP; and
- e) Train HWF personnel in the proper use of PPE and response equipment.

### 6.2 Hazardous Waste Facility Leader/Disposer shall;

- a) Report to and assist the Supervisor as required;

- b) Understand and comply with the procedures and guidance established in the instruction;
- c) Perform all work in a safe manner so as not to cause personal harm or injury, or endanger the health and safety of others;
- d) Read the hazardous waste Material Safety Data Sheet (MSDS), understand the associated hazards, and take the necessary health and safety precautions; and
- e) Report observed and perceived non-compliance with this instruction to the Supervisor.

## 7.0 PROCEDURES

HWF personnel at the U.S. Naval Base in San Diego provide for the collection (including consolidation), storage, disposal, and transfer of HW and non-HW. The facilities also serve as a storage and collection center for recyclable and exempt material.

### 7.1 Standard Operating Procedures

The Service Provider maintains Standard Operating Procedures (SOPs) and Enclosures for guidance and instruction on processes to be followed by HWF employees in order to comply with federal and state regulations. Supervisors are required to keep copies of the SOP's and Enclosures in an area of easy access for all employees in the HWF and must train employees on all Standard Operating Procedures and updates. See Enclosure (1) for a list of the current Standard Operating Procedures maintained by the Service Provider and Enclosure (2) for a list of the current Enclosures used by the Service Provider.

### 7.2 New or Occasional Activities

Some activities that are new or occur infrequently will not be addressed by existing SOPs or AHAs. Workers must assess the hazards associated with the activity before starting it. When questions or concerns arise as to the nature of the hazards or correct procedure, consult the Supervisor and or the Compliance/QC Manager before starting the task. It may be appropriate to establish an SOP/AHA before performing the task.

At a minimum, the associated hazards, fire safety and personal protective equipment need to be considered for any new or occasional activity. Some examples:

#### Hazards:

Toxicity	Noise	Lighting	Lead acid batteries
Corrosivity	Spills	Slips/Trips/Falls	Cylinders
Ignitability	Heat/Cold	Vehicular Traffic	Working on or near water
Lifting	Sharps	Drum handling	Adjacent activities

#### Fire Safety:

Eliminate ignition sources	Fire extinguishers	Grounding/Bonding
Non-sparking tools	Fire alarm	Emergency exits

PPE:

Respirator	Safety glasses/goggles/face shield	Hard hat
Hearing protection	Tyvek/Coveralls	Steel toe boots
Glove selection	Safety Shower	First aid kit

New or occasional activities that do not present serious hazards may be addressed as a topic at a Daily Safety Tailgate Meeting instead of developing an AHA.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Procedure for Unknowns

**References:** (a) None

**Enclosures:** (1) CSW-005 (Waste Turn-In Form)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel, providing environmental services under contract N62473-10-D-4009, with guidelines for dealing with waste that may not be identified prior to any attempts to pick it up.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This procedure defines the procedures for waste not properly identified and gives guidance to personnel on HW and HM acceptance and turn-in procedures and policies.

## 4.0 ACTION

This document applies to all personnel in the San Diego area, who require CSW services for disposal of HW and HM in accordance with federal and state regulations.

## 5.0 DEFINITIONS

- a) **Hazardous Waste** – (HW) is any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- b) **Hazardous Material** – (HM) is any material or substance that, even in normal use, poses a risk to health, safety, or the environment.
- c) **Waste Turn-In Form** - is an accounting document used to bill activities accounts for management of their HW.
- d) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- e) **Label** - the shape of a diamond and it measures 3.9" on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table 172.101.

- f) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- g) **CSW**- Containerized Solid Waste
- h) **Service Provider** – The company or entity operating HWFs and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.
- i) **Unknown** – an unmarked/unlabeled material which the customer cannot identify or a material mis-identified by the customer.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP.
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader (Leader)

- a) Reports to and assist the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this Standard Operating Procedure.

### 6.3 HWF Disposer (Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

## 7.0 PROCEDURES

### 7.1 Contact

When an activity or command discovers an unknown during normal operating hours (M-F, 0730 to 1600, excluding holidays), they should contact the following to schedule service:

Naval Station: 619-556-9600, Supervisor  
North Island/NAB: 619-545-6520, Supervisor/Admin Assistant  
Sub Base: 619-553-1303, Supervisor

The Designated Government Representative (DGR) needs to be notified and apprised of the request at the same time as it is received.

## 7.2 Response to Site

- a) Prior to responding to the location of the unknown, arrangements must be made for the point of contact (POC) to be on-site, along with any additional information or personnel that may help identify the unknown and any associated hazards. Also, the POC should be someone that has authority to commit funding if additional out-of-scope work needs to be completed. If additional out-of-scope work needs to be performed, the Contracting Officer must first give approval to proceed. Once on site:
  - All initial information (if any) on what is in the container must be reviewed.
  - Any available personnel shall be interviewed to determine where the material may have originated or what process may be associated with the container (e.g. "came from maintenance shop, part of oil refilling operation").
  - Any container markings shall be recorded.
  - Any external signs will be noted (e.g. stains, external traces of contents, odors, etc).
  - Adjacent areas will be inspected for similar containers and compared.
  - Any personnel in adjacent areas will be interviewed for additional knowledge.
- b) If enough information is collected, and a determination made that there is enough knowledge of the potential hazards, the Supervisor will determine if it is safe to open the container. The Supervisor will first determine what PPE level (C or lower) will be utilized for that operation. This determination will be made after the Supervisor has consulted with other knowledgeable people and Health & Safety.
- c) Once the container is open, the crew will use visual inspection, field tests, further interviewing of local personnel, etc. to help determine the contents. If this fails to identify the material, a representative sample will be collected and sent to an ELAP certified lab for further analysis.

## 7.3 Unidentifiable Material

- a) If the above procedures do not result in enough information to make a determination that it is safe to open, or what PPE is required, an outside contractor with appropriate equipment and abilities will be obtained to open and sample the container.
- b) If it is deemed unsafe to open due to high hazards (e.g. rumbling drum, high pressure bulging, excessive heat, chemical vapor plumes, etc.), Federal Fire will be immediately contacted at 9911.

## 7.4 Documentation Requirements

#### 7.4.1 Waste Turn-In Forms

- a) HWF personnel will complete the Customers Use section (highlighted in gray) of the Waste Turn-In Form (Enclosure 1) for turn-in of both HW and HM.
- b) Enter the description of the waste in the containers.
- c) This form is used for identification and billing purposes, therefore it is important that the personnel provide legible, complete and accurate information.

#### 7.4.2 Material Safety Data Sheets (MSDS)

If applicable and available.

#### 7.4.3 Lab Analysis Reports

ELAP certified laboratory analysis of the HW is mandatory if the composition of the HW is unknown.

#### 7.5 Unacceptable (not permitted) wastes

The Service Provider is not permitted to accept into the HWFs the following items as HW:

- a) High or low-level radioactive waste of material.
- b) Biohazardous wastes, sewage, urine and feces.
- c) Medical wastes, drugs, needles, and sharps.
- d) Explosives, ammunition, bombs and pyrotechnics.
- e) Trash, wet garbage and inedible food.

**Note: Most of the above items are handled by other government activities under a variety of special programs. The Service Provider may accept some pharmaceutical waste for disposal providing they do not meet the definition of controlled substances. Acceptance of pharmaceutical medical waste will be determined on a case-by-case basis. HWF Disposers must obtain their Supervisor's approval before accepting pharmaceutical medical waste for disposal.**

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# STANDARD OPERATING PROCEDURE

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**Subject:** USE OF THE NAVY FACILITY WASTE ANALYSIS PLAN

**References:** (a) Code of Federal Regulations, Title 40, Part 264.13(b), 265.13(b), 268.7(a) (5)  
(b) California Code of Regulations, Title 22, Part 66264.13(b), 66265.13(b)

**Enclosures:** (1) None

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidelines for:

- a) acceptance of Hazardous Waste (HW) and Hazardous Material (HM) generated by shore activities for disposal;
- b) the disposal of hazardous material that has been rejected by the Hazardous Material Minimization Center (HMC) and the Defense Logistics Agency Distribution Services (DLA DS) in accordance with the references; and
- c) to provide guidance on the purpose and use of the HWF Waste Analysis Plan.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-R-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM. In accordance with the regulations, the permitted facilities are required to prepare and maintain Waste Analysis Plans (WAPs). The ninety-day facilities use the WAPs as guidance documents to assist customers in making reasonable determinations on performing analytical tests.

## 3.0 SCOPE

This procedure provides guidance to Service Provider personnel on the purpose and use of the HWF WAP.

## 4.0 ACTION

This document applies to all personnel in the San Diego area, who require CSW services for disposal of HW and HM in accordance with federal and state regulations.

## 5.0 DEFINITIONS

- a) **Analysis** - Any data that supports the proper characterization of a waste. An analysis may include results from visual inspections, support documentation scrutiny, material safety data sheet review, existing published or documented data on waste from the same or similar

- processes, generator knowledge of the materials used or the process generating the waste, and laboratory analysis.
- b) **Certification** - A documented assurance that the characterization of a waste is accurate and up-to-date. Certification may consist of reviewing current waste characterization support documentation and attesting to its accuracy.
  - c) **Hazardous Waste** – (HW) is any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
  - d) **Hazardous Material** – (HM) is any material or substance that, even in normal use, poses a risk to health, safety, or the environment.
  - e) **Waste Turn-In Form** - is an accounting document used to bill activities accounts for management of their HW.
  - f) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
  - g) **Label** - the shape of a diamond and it measures 3.9” on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table 172.101.
  - h) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
  - i) **CSW**- Containerized Solid Waste
  - j) **Service Provider** – The company or entity operating HWFs and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader (Leader)

- a) Report to and assist the Supervisor as required.
- b) Understand and comply with the procedures and guidance established in this Standard Operating Procedure.

### 6.3 HWF Disposer (Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

## 7.0 PROCEDURES

The Waste Analysis Plan describes the procedures for HWF personnel to comply with the regulations in order to obtain a detailed chemical and physical analysis of a representative sample of waste in the facility. This plan includes the parameters for which each HW will be analyzed and the rationale for the selection of these parameters, the test methods which will be used to test for these parameters, and the sampling and sampling management methods which will be used to obtain a representative sample.

### 7.1 Permitted Facilities

- a) Supervisors shall read and discuss the provisions established in the Waste Analysis Plan (WAP) with HWF personnel.
- b) The Supervisor will locate the WAP in an easily accessible location and ensure that authorized personnel know where the plan is located.
- c) When accepting waste into the HWF, the Supervisor will ensure that there has been analysis previously done on the waste stream and the supporting documentation accompanies the waste. If the HWF has not previously accepted this waste stream and there is no analysis for that particular waste stream, the Supervisor shall follow the WAP in order to make reasonable determinations on performing analytical tests. The customer will be charged for the lab analysis.
- d) The WAP procedure must be followed to annually certify current waste analysis for each waste received by the facility. The Supervisor is responsible for ensuring that annual certifications are completed.

### 7.2 90-day Storage Facility

- a) Personnel at the 90-day storage facility should use the WAP as a guidance document to assist generators in characterizing their wastes for disposal.
- b) When accepting waste to the facility, ensure that there has been analysis previously done on the waste stream and that the supporting documentation accompanies the waste. If the facility has not previously accepted this waste stream and there is no analysis for that particular waste stream, the Supervisor of EPS shall follow the WAP in order to make reasonable determinations on performing analytical tests. The customer will be charged for the lab analysis.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Preparation of Land Disposal Restriction (LDR) Statements

**References:** (a) Code of Federal Regulations, Title 40, Part 268  
(b) California Code of Regulations, Title 22, Chapter 18

**Enclosures:** (1) CSW-063 (Land Disposal Restriction Notification)  
(2) CSW-064 (Land Disposal Restriction Certification)  
(3) CSW-065 (Asbestos Land Disposal Restriction Certification)

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### 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidelines for completing Land Disposal Restriction Notification and Certification statements.

### 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

### 3.0 SCOPE

This procedure defines the preparation of Land Disposal Restriction Statements and gives guidance to personnel on how to prepare Land Disposal Restriction Statements.

### 4.0 ACTION

This document applies to all personnel in the San Diego area, who require CSW services for disposal of HW and HM in accordance with federal and state regulations.

### 5.0 DEFINITIONS

- a) **Analysis** - Any data that supports the proper characterization of a waste. An analysis may include results from visual inspections, support documentation scrutiny, material safety data sheet review, existing published or documented data on waste from the same or similar processes, generator knowledge of the materials used or the process generating the waste, and laboratory analysis.
- b) **Certification** - A documented assurance that the characterization of a waste is accurate and up-to-date. Certification may consist of reviewing current waste characterization support documentation and attesting to its accuracy.
- c) **Hazardous Waste** – (HW) is any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.

- d) **Hazardous Material** – (HM) is any material or substance that, even in normal use, poses a risk to health, safety, or the environment.
- e) **Waste Turn-In Form** - is an accounting document used to bill activities accounts for management of their HW.
- f) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- g) **Label** - the shape of a diamond and it measures 3.9” on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table 172.101.
- h) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- i) **CSW**- Containerized Solid Waste
- j) **Service Provider** – The company or entity operating HWFs and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader (Leader)

- a) Report to and assist the Supervisor as required.
- b) Understand and comply with the procedures and guidance established in this Standard Operating Procedure.

### 6.3 HWF Disposer (Disposer)

- a) Understands and complies with the procedures and guidance established in this instruction.
- b) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- c) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

## 7.0 Procedures

An LDR Notification or Certification statement must be completed for each shipment of RCRA or Non-RCRA hazardous waste that is manifested by the Service Provider from an off-site point of generation to a NAVFAC Southwest permitted facility unless a Notification or Certification was previously submitted, and the receiving facility has it on file. The Service Provider also manifests wastes from NAVFAC Southwest facilities to contracted commercial TSD facilities for final disposal. In most cases, contracted commercial TSD facilities provide their customers with LDR forms for use in shipping wastes to their facilities. In the event that a commercial TSDF does not provide the Service Provider with an LDR form, Enclosure (1) and/or (2) must be included with the outgoing Uniform Hazardous Waste Manifest. For asbestos-containing waste, Enclosure (1) and (3) must be included. The procedures for completing the LDR notification and Certification statements, Enclosure (1) and attachments (1)-(3), and Enclosures (2) and (3) are as follows:

a) **LDR Notification Statement and Attachments (Enclosure 1):** If the waste does not meet published treatment standards as established in Reference (a)-(c), prepare a Notification statement and attachments as applicable and submit to the receiving TSDF. Instructions for preparing the Notification statement and attachments follow:

- **Generator Environmental Protection Agency (EPA) Identification Number:** List the generator EPA ID Number.
- **Uniform Hazardous Waste Manifest Number:** List the manifest number of the shipment.
- **Waste Category:** Based on the waste characterization information, determine which category the manifested waste falls into and check that category. **If the checked categories refer to an attachment, include that attachment in the LDR Notification.**

The waste categories and their definitions are listed below:

- i. **F001-F005 spent solvents:** Federally listed wastes found in Title 40 Code of Federal Regulations (CFR) 261.31
- ii. **California List Waste:** State regulated waste listed in California Code of Regulations (CCR) Title 22, 66268.32
- iii. **D001-D0043 waste:** Federally regulated waste that exhibits the characteristic of toxicity, found in 40 CFR 261.30
- iv. **NON-RCRA waste:** Wastes that are not federally regulated but are considered hazardous by the State of California
- v. **Hazardous debris subject to alternative treatment standards:** Debris contaminated with hazardous waste that is subject to treatment standards listed in 40CFR 268.45
- vi. **Other Waste:** Waste that do not fall into any of the above categories.

Complete the blanks in the table, with one exception. When shipping hazardous debris that is subject to the alternative treatment standards of 40 CFR 268.45, skip the table

entirely and proceed to attachment # 3. For all other wastes, fill out one row for each line item of restricted waste appearing on the manifest. If there are more than 7 items on the manifest, attach extra LDR cover sheets for those items. The fields in the table are listed below along with an explanation of how to complete them.

- **Manifest Line Item Number (page and line):** In the first space list the page number of the manifest on which the item is listed. For example “1” for page one. In the second space, list the manifest line item number or the item, for example “11a” for item on line 11a of the manifest.
- **Hazardous Waste number (EPA or California):** List the Hazardous waste codes that apply to the waste. For example, when manifesting hydrochloric acid with a pH < 2, the appropriate EPA code is D002 for corrosive wastes. The appropriate California State code is 791. The EPA waste codes are found in 40 CFR 261.24 – 261.33 The California state waste codes are listed in 66261.126 Appendix XII.
- **Waste Subcategory, if Applicable:** If Applicable, list the appropriate waste subcategory from the: Treatment Standards for Hazardous Wastes table in 40 CFR 268.40 or CCR Title 22 66268.40 in the space. This space is only filled out if the manifested waste falls into a subcategory. An example of a waste that fits into a subcategory is reactive cyanide. Its EPA code is D003 and its subcategory is reactive cyanides. Below is a partial list of waste subcategories and their respective EPA codes.

<u>EPA Code</u>	<u>Waste Subcategory</u>
D001	High Total Organic Carbon (TOC)
D001	High TOC ignitable Characteristic liquids
D003	Reactive Cyanides
D003	Reactive Sulfides
D003	Water Reactive
D006	Cadmium containing batteries
D008	Lead Acid Batteries
D009	High Mercury- Organic
D009	High Mercury – Inorganic
F025	Light Ends
F025	Spent Filters/ Aids and Desiccants
P065	Low Mercury residues from RMERC

- **Treat ability Group (wastewater or non-wastewater).** List “WW” for wastewaters or “NWW” for non-wastewaters. A wastewater is a waste with less than 1 % Total Organic

Carbon (TOC), and less than 1 % Total Suspended Solids (TSS). Exceptions to this definition are listed below:

- i. **F001-F005** wastewaters are solvent – water mixtures that contain less than 1% TOC or less than 1% total F001- F005 solvent constituents listed in 66268.40
  - ii. **K011, K013, K014** wastewaters contain less than 5% TOC and less than 1% TSS, as generated.
  - iii. **K103 and K104** wastewaters contain less than 4 % TOC and less than 1 % TSS.
- **Where the waste falls into waste categories 1 through 5, fill out the appropriate attachment sheet.** When completing a section on an attachment sheet, note the manifest line item number of the waste to which the sheet applies. If more than one line item on the manifest fall into the same waste category but do not have identical constituents, add an additional attachment sheet for each additional non- identical line item. For example, if two line items have wastes which fall into the F001-F005 spent solvents waste category and each has different constituents, two sheets of Attachment #1 should be included, one for each line item.
    - i. **Attachment 1.** This sheet addresses F001-F005 Spent Solvents and California List Waste. If any of the manifested waste fall into either of these two categories, attach this sheet. In the applicable section of the sheet, list the manifest page and line item number of the waste.
      - **F001-F005 Spent Solvents.** When manifesting F001-F005 waste, review both the long list on the left side of the page and the short lists on the right side of the page prior to making a selection. If your waste meets the conditions of any of the short lists on the right side of the page, check all appropriate constituents for that list. If the waste does not meet any of the conditions of the right side of the page. Check all appropriate constituents for the long list on the left side of the page. Do not select constituents from more than one list.
      - **California List Waste.** California List Wastes are named in CCR Title 22 66268.32 and carry specific prohibitions. When manifesting a California List Waste, check the category into which the waste falls.
    - ii **Attachment 2.** This sheet addresses D001-D043 waste. If any of the manifested wastes fall into any of these categories, attach this sheet. At the top of the sheet, list the manifest page and line item number of waste and check, which of the waste categories apply. After selecting the appropriate waste category from the list at the top of the page, review the list of underlying hazardous constituents on attachment # 2. Check all of the constituents from the list that are (or expected to be) present in the waste. If more than one line item on the manifest falls into the D001-D043 categories, but have different underlying hazardous constituents, add an additional attachment sheet for each additional line item. If no listed constituents are present, return on top

of the sheet and check category A, "No listed constituents above treatment standards".

- iii **Attachment 3.** This sheet addresses both Non-RCRA Restricted Waste and Hazardous Debris Subject to Alternative Treatment Standards. If any of the manifested wastes fall into either of these two categories, attach this sheet. In the applicable section of the sheet, list the manifest page and line item number of the waste.
- **Non-RCRA Restricted Waste.** When manifesting Non-RCRA restricted waste, select and check the appropriate waste category from the list.
  - **Hazardous Debris Subject to Alternative Treatment Standards.** Complete the bottom portion of attachment # 3 when manifesting hazardous debris that is subject to the alternative treatment standards in 40 CFR 268.45. Debris is subject to alternative standards if it is contaminated with wastes that have been assigned treatment standards, which are listed in 268.40. The single exception to this is when the debris itself is listed in 268.40, in which case the debris must be treated to meet the treatment standard in 268.40. If this exception applies, check the "Other Wastes" category on the cover page of the Notification form and complete the table. Do not fill out any attachment sheets. If the debris waste is subject to the alternative treatment standards, check the box stating that the debris falls into the alternative treatment category. Debris that falls into the alternative treatment category must be treated for each contaminant. In the table at the bottom of attachment sheet # 3, list all debris contaminants and their applicable waste codes.
- b) **LAND DISPOSAL RESTRICTION CERTIFICATION STATEMENT (Enclosure 2):** In addition to notifying disposal facilities that restricted waste are subject to treatment standards, generators must also certify to these facilities that these waste do or do not meet their treatment stands. (Certification statements are not required when sending waste to HW Facilities. If applicable, a certification statement must be submitted when sending wastes to commercial TSD facilities. Contracted commercial TSD facilities typically provide their own version of the LDR statement. If a contractor does not provide LDR paperwork or if the paperwork is incomplete prepare and attach the CSW LDR, including the Notification and/or certification, to the manifest. A copy of the LDR paperwork and any supporting documentation, including lab analyses, must be kept at the generator's site for at least three years after the waste is sent off-site. The procedure for completing the certification statement follows:
- **Uniform Hazardous waste Manifest number:** On this line the Uniform Hazardous Waste Manifest number of the shipment.

- **Waste may be land disposed without further treatment:** If supporting laboratory analyses and documentation can show that any of the wastes listed on the manifest meets its treatment standard for each restricted constituent, check this box. List the manifest page and line item number of that waste item and sign at the bottom of the page. The Certification statement includes language that can hold the certifying individual civilly and criminally liable for making misrepresentations.
  - **Waste must be further treated before being land disposed.** If waste require further treatment. Check this box and sign at the bottom of the page.
- c) **ASBESTOS LAND DISPOSAL RESTRICTION CERTIFICATION (Enclosure 3):** When shipping asbestos-containing waste to a commercial TSD operation within the State of California, and the generator determines that the waste can be land disposed without further treatment, the generator must submit a Notification and also a Certification to the receiving facility. The Certification should state that the waste meets the treatment standards in 66268.114. The procedure for completing the Asbestos Certification statement follows:
- **Uniform Hazardous Waste Manifest Number:** On this line, list the Uniform Hazardous Waste Manifest Number of the shipment.
  - **Asbestos-containing waste may be land disposed without further treatment:** Check this box if supporting documentation can show that the waste meets treatment standards in 66268.114 and can be disposed of without further treatment. List the manifest page and line item number of that waste item and sign the bottom of the page. The Certification statement includes language that can hold the certifying individual civilly and criminally liable for making misrepresentation.
  - **Asbestos-containing waste must be treated further before being land disposed:** If the waste requires further treatment. Check this box and sign at the bottom of the page.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Waste Management System: Requirements to Track and Store Wastes

**References:** (a) SOP HW-05-023, "Hazardous Waste Management"  
(b) California Health and Safety Code, Section 25143  
(c) CA Code of Regulations, Title 22, Chapter 12, Article 4  
(d) California Code of Regulations, Title 22, Chapter 14, Article 5, section 66264.73  
(e) Hazardous Waste Facility Permit for Naval Base San Diego  
(f) Hazardous Waste Facility Permit for North Island

**Enclosures:** (1) CSW-005 (Waste Turn-in Form)  
(2) CSW-016 (Packing List)  
(3) CSW-068 (Waste Tracking Record)  
(4) CSW-069 (CST Container Movement /Tracking Log)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide personnel providing environmental services under contract N6243-10-D-4009 with guidelines for tracking wastes through the Hazardous Waste Facilities (HWF).

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This standard operating procedure (SOP) defines the procedure for receiving waste and entering information into the HWF Operating Record to ensure compliance with tracking requirements.

## 4.0 ACTION

This document applies to all HWF personnel providing service under contract N62473-10-D-4009.

## 5.0 DEFINITIONS

a) **Facility:** "Hazardous waste facility," "hazardous waste management facility," "HW facility," "HWF," or "facility" – (HWF) means: All contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combination of these units.

- b) **Hazardous Waste Management Unit(s)** - (HWMU) HWMU are continuous structures that manage hazardous waste. Examples of HWMU include a surface impoundment, a waste transfer area, an incinerator, a tank and its associated piping and underlying containment system, and a container storage area. A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed. Within the Naval Base San Diego CST complex (the area enclosed by the fence line) there is only one permitted HWMU: building 3458, the CST itself.
- c) **The North Island IWTP/ORP/CST complex** (the area within the fence line) is comprised of two permitted containerized storage HWMU: building 1096, the CST1; and building 1606, the CST2.
- d) **Generator** - "Generator" or "producer" means any person, by site; whose act or process produces hazardous waste identified or listed in [22 CCR, chapter 11]... or whose act first causes a hazardous waste to become subject to regulation.
- e) **CSW**- Containerized Solid Waste
- f) **Service Provider** – The company or entity operating HWF and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

## 7.0 PROCEDURES

The HWF Supervisor designates a person to be responsible for the proper inspection, marking and tracking of waste received that day. This person's name is recorded on the Daily Inspection Form CSW-030 and/or CSW-031 and is the gate keeper for waste placed into storage.

### 7.1 Waste Acceptance – within 48 hours of arrival at storage facility

#### a) Initial Inspection

- Compare each container of the inbound shipment with the Waste Turn-In Form and shipping paper, if applicable, to ensure the container count and labels are correct.
- Verify contents have been inspected per SOP HW-05-003 or HW-05-004
  - i. If conditions did not allow for safe visual verification at the pick up site, evaluate the documentation and container to determine if the contents can be visually verified at the Facility. If they cannot, call the Supervisor for direction. Coordinate with the Waste Profiler or Supervisor to make appropriate changes to the Waste Turn-In Form.
  - ii. Verify that the visual inspections, done at the pick up site and noted on the Waste Turn-In Form, were done correctly by repeating the steps described by SOP HW-05-003 or SOP HW-05-004.
- Ensure the list of applicable SDS/Analytical, manufacturer's label and/or copies of any new SDS/Analytical data etc. are present.

b) Each container for which the waste acceptance conditions identified in the initial inspection have been met is marked with a colored dot. The dot is applied to the container next to the Hazardous Waste Label with the initials of the person who verified the contents.

c) If a discrepancy is noted and cannot be immediately resolved, the following actions are taken:

- No colored dot is placed on the container.
- The Supervisor is notified.
- The Supervisor actively manages containers without colored dots to ensure speedy resolution.
- Issues not resolved within two business days are reported to the QC/Compliance Manager.

d) Give the Waste Turn-In Form to the individual who will record information on the form.

e) Give copies of any new SDS or Analytical Reports to the Waste Profiler. Note on each, the control number, profile and activity code.

f) Determine which containers may be immediately tracked into inventory and which must be processed in the repackaging area. The drum number assigned to a container immediately tracked into inventory must be recorded in the "DRUM #(s)" column of the Waste Turn-In Form (Enclosure 1) for that specific line item.

- g) The Supervisor actively manages personnel to ensure containers are processed through the repackaging area and put into inventory to maintain compliance with the Facility Permit and SOPs.
- h) The **Waste Profiler\*** and the Supervisor will verify that the information on the Waste Turn-In Form (Enclosure 1) is complete and accurate, then the Supervisor stamps the Waste Turn-In Form with a QC stamp and adds their initials and the date. The review is not done until all waste described on the Waste Turn-In Form has been inspected, consolidated or marked and tracked into inventory. If the waste is from an off-base shipment, the Supervisor signs the manifest and routes it per HW-05-006. **\*Waste Profiler involved only at NASNI & NAB.**

## 7.2 Consolidation and Repacking

- a) The Supervisor or designee will decide which containers will be consolidated and which will be marked and tracked into storage without consolidation. Containers to be consolidated prior to storage will have a completed HW Label and the Waste Turn-In Form is retained at or near the repackaging area until consolidation is complete. When consolidation is complete, the drum number of the container that the waste was consolidated into is recorded in the "DRUM #(s)" column of the Waste Turn-In Form for each consolidated waste. Consolidation of incoming waste must be completed within two days of receipt.
- b) When a consolidation drum is created, it is to be labeled prior to adding any waste. It must be labeled to reflect the material with the oldest accumulation start date held inside; marked (section 7.3) and tracked (section 7.4). If waste is later placed in that container with an older accumulation start date, the label is revised to reflect the earlier date.
- c) Consolidation into a drum is done in accordance with SOP HW-05-032:
- d) A packing list (Enclosure 2) is kept with each consolidation drum that identifies the wastes consolidated into the drum, the quantity of each waste and the control number.
- e) When a consolidation drum is full, it is weighed, tracked into, and placed in a storage bay with colored dot in accordance with sections 7.1, 7.3, 7.4 and 7.5 below.

## 7.3 Drum Tracking Information

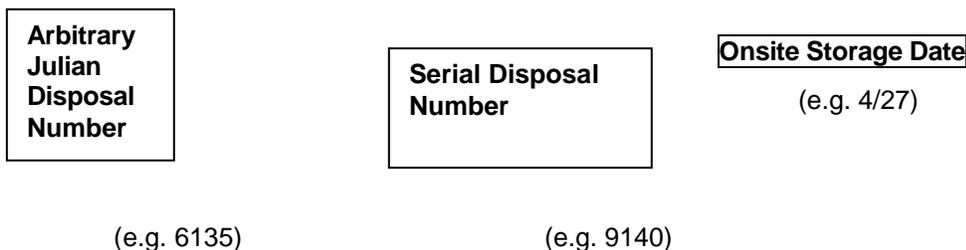
The Drum Tracking Information is marked on the side of the container, adjacent to the Hazardous Waste Label, in the following configuration:

**Container Number**

(e.g. 06 – 5 – 0123)  
(YR – LOC – Consecutive Drum #)

**Storage Bay #**

(e.g. 7)



#### 7.4 Waste Tracking Record (Enclosure 3)

- a) Facility Operating Record tracking information to be entered on the Waste Tracking Record sheets includes:
- **INBOUND Information:**
    - i. **CONTROL NUMBER** – the Julian date of the pick-up followed by a Navy activity (generator) code (e.g. 6145-A011)
    - ii. **DESCRIPTION** – waste composition identification
    - iii. **CONTAINER LABEL ACCUMULATION DATE** – the accumulation start date from the generator's original label – NOTE: the 90-day clock starts from this date.
    - iv. **ONSITE STORAGE DATE** – the date on which the container is actually placed into storage – NOTE: the 1-year TSDf clock starts from this date.
    - v. **CONTAINER SIZE / TYPE** – e.g. 55 G / DM
    - vi. **WT** – weight of the container – NOTE: must be placed on label and in Waste Tracking Record when waste is put into storage
    - vii. **STORAGE LOCATION (BAY#)** – where the container is placed in storage
    - viii. **DISPOSAL NUMBER** – arbitrary Julian date / DLA DS disposal #
    - ix. **PROFILE NUMBER** – the established USN profile number of the waste
  - **ON-SITE Information:**
    - i. **MOVED TO / DATE MOVED** – this box will be completed if container is moved from 90-day to TSDf or from one bay to another
  - **OUTBOUND Information:**
    - i. **OUTBOUND DATE/DELIVERY ORDER NUMBER** – date when manifest was signed by the generator for off-site shipment / delivery order number. If the container is consolidated into another, the drum number holding the material after consolidation is recorded in this space.
- b) The Waste Tracking Record sheets will be maintained by the TSDf as the Facility Operating Record and kept until closure of the facility.

#### 7.5 Storage and Segregation

- a) After waste is accepted (section 7.1), marked with tracking information (section 7.2) and recorded on the Waste Tracking Record (section 7.4); CSW personnel will place the waste in the 90-day (see respective Business Plan Maps) or TSD storage area.
- b) Waste is segregated and stored in bays based on hazard class and/or compatibility.
- c) Waste storage areas are arranged to separate DOT hazard classes, comply with regulatory/permit requirements and isolate incompatible compounds.

## 7.6 Data Entry

Input the data recorded on the Waste Turn-In Form in to EWBATS database system.

## 7.7 Drum Movement or Consolidation Following Tracking

- a) If a container is moved or consolidated after being tracked into a storage bay, the information recorded on the container under section 7.3 and in the Waste Tracking Record (section 7.4) must be revised immediately.
- b) A CST Container Movement/Tracking Log (Enclosure 4) may be used to substitute for the immediate revision of the Waste Tracking Record, if the Log is kept in the Repackaging Area or with the Waste Tracking Record Binder.
- c) If the CST Container Movement/Tracking Log is utilized, updates to the Waste Tracking Record must be completed at least weekly.
- d) Information recorded on the CST Container Movement/Tracking Log is:
  - Container Number
  - Profile Number
  - Moved from Bay (if container is moved from one bay to another)
  - Moved to Bay (if container is moved from one bay to another)
  - Other Changes (weight change or consolidated into drum#\_\_\_\_)
  - Date (date of movement or change)
  - Name (name or initials of person recording change)

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# STANDARD OPERATING PROCEDURE

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**Subject:** Hazardous Waste Facilities Records Management

**References:** (a) Code of Federal Regulations, Title 40, Part 261-265  
(b) California Code of Regulations, Title 22, Part 66261- 66265  
(c) Code of Federal Regulations, Title 49, Part 171-180

**Enclosures:** (1) CSW-005 (Waste Turn-in Form)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidelines for managing records of Hazardous Waste (HW) and Hazardous Material (HM) turned in, by the different activities or rejected by the Hazardous Material Minimization Center (HMC) and the Defense Logistics Agency Distribution Services (DLA DS), for transportation and disposal in accordance with the references.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This procedure gives guidance to personnel on the HWF records management procedures and policies required to ensure compliance with tracking requirements.

## 4.0 ACTION

This document applies to all HWF personnel providing service under contract N62473-10-D-4009.

## 5.0 DEFINITIONS

- a) **Accumulation Start Date** - Date the waste was determined to be a hazardous waste and the decision was made to dispose of it.
- b) **Hazardous Waste** – (HW) is any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- c) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- d) **Waste Turn-In Form** - is an accounting document used to bill activities accounts for management of their HW.

- e) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- f) **Label** - the shape of a diamond and it measures 3.9" on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table & 172.101, with additional information available in Subpart E of reference (c).
- g) **CSW**- Containerized Solid Waste
- h) **Service Provider** – The company or entity operating HWFs and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.
- i) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

### 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Report to and assist the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### 6.3 Customer Service/Administration

- a) Reports to and assist the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this Standard Operating Procedure.

## 7.0 PROCEDURES

a) **Waste Turn-In Forms**

- Personnel will complete the Hazardous Waste Turn-In Form (Enclosure 1) for turn-in of both HW and HM.
- Enter the julian date, activity code, building number, contact name and phone number and an accurate description of each waste being picked up.
- This form is used for identification and billing purposes, therefore it is important that personnel provide legible, complete, and accurate information.
- The Service Provider will provide blank Waste Turn-in Forms and will assist personnel in filling them out.
- Once at the receiving facility, the information is entered into EWBATS and filed for future reference.

b) **Safety Data Sheets (SDS)**

SDS for the material is required to accompany HW when HWF personnel arrive to conduct the pick-up, if a standardized profile has not been prepared for the HW being turned in.

The Service Provider recommends that a file of SDSs be maintained at each facility with the appropriate profile in order to assist in characterizing HW along with the supporting documentation for the standardized profiles for the command or code.

c) **Lab Analysis Reports**

- Laboratory analysis of the HW is mandatory if the composition of the HW is unknown.
- Analysis needs to be filed with the appropriate profile as well as with the paperwork associated with the drum(s).

d) **HW Profile Sheet**

The Service Provider has prepared standardized profiles for routine waste streams. If the generating activity's HW that is being turned in does not conform to their established standardized profile, the activity is required to fill out the profile sheet. If the HW is recurring, the Service Provider will develop a standardized profile for the waste stream.

The completed and approved profiles need to be filed at the central profiling location (NASNI Bldg. 1606) and copies pushed out to all locations. For newly created profiles, a copy needs to be forwarded to DLA DS.

e) **Manifests**

Manifests need to be properly completed and signed by the appropriate personnel. Copies need to be filed at the appropriate facilities. These copies need to be kept for 3 years.

When copies are returned from the final disposal outlets, these copies need to be filed along with the other matching copies of the manifest already on-file.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Management of Elemental Mercury & Manufactured Articles with Mercury

**References:** (a) Code of Federal Regulations, Title 40, Part 261 - 265  
(b) California Code of Regulations, Title 22, Part 66261 - 66265  
(c) Code of Federal Regulations, Title 49, Part 171-180

**Enclosures:** (1) CSW-007 Hazardous Waste Label  
(2) CSW-081 Universal Waste Label

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidelines for acceptance and disposal of elemental mercury waste that has been rejected by the Hazardous Material Minimization Center (HMC) and the Defense Logistics Agency Distribution Services (DLA DS) in accordance with the references.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This SOP outlines the procedure for managing elemental mercury as a hazardous waste and manufactured articles containing mercury as a universal waste.

## 4.0 ACTION

This document applies to all HWF personnel providing service under contract N62473-10-D-4009.

## 5.0 DEFINITIONS

- a) **Elemental mercury** – unused and/or slightly contaminated (at least 99% pure) pure or technical grade mercury must be suitable for direct use or be usable after refining.
- b) **Manufactured articles containing mercury** - articles, such as thermometers, fuses, gauges, meters, and switches that are hermetically sealed and contain elemental mercury.
- c) **CSW**- Containerized Solid Waste
- d) **Service Provider** – The company or entity operating HWF and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.
- e) **Hazardous Waste Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.

## 6.0 RESPONSIBILITIES

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These standard policies and procedures are applicable to all Operator personnel, except where superseded by regulations or Navy requirements.

**6.1 HWF Supervisor (Supervisor)**

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.

**6.2 HWF Leader/Disposer (Leader/Disposer)**

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

**6.3 Customer Service/Administration**

- a) Reports to and assist the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this Standard Operating Procedure.

**7.0 PROCEDURES**

**7.1 Accumulation Procedure**

- a) Elemental mercury shall be managed as a hazardous waste and manufactured articles containing mercury shall be managed as a Universal Waste (refer to SOP HW-05-011 for management guidelines)
  - Place the mercury in a container that is labeled with an appropriate hazardous waste label (Enclosure 1).
  - Store the container in the appropriate storage location (refer to mercury SDS for incompatibilities).
  - When a sufficient amount of mercury has accumulated, follow SOP HW-05-031 to prepare the container for offsite disposal.
- b) Manufactured articles containing mercury shall be managed as a Universal Waste per the guidelines outlined in SOP HW-05-011.
  - The articles must be placed in a container that is labeled with an appropriate Universal waste label (Enclosure 2).

- The articles must be placed in a container with packing materials to prevent damage during storage and transportation.
- Any articles that show evidence of leakage or damage must be placed in a sealed plastic bag before being consolidated into a structurally sound container.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Preparation of 1348 Comments Section

**Enclosures:** (1) CSW-071 (1348 Not Reviewed)  
(2) CSW-072 (1348 Reviewed and Approved for DLA DS)  
(3) CSW-073 (List of Waste Acceptable for On-site Treatment IWTP, OWTP)  
(4) CSW-018 (IWOW Waste Acceptance Form)  
(5) CSW-074 (DD Form 1348-1A QC Checklist)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with guidelines for preparation of the DD 1348's comments section as it is entered into EWBATS for approval by the Designated Government Representative (DGR) and sent to the Defense Logistics Agency Disposition Services (DLA DS).

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This procedure gives HWF employees preparing DD 1348's guidance on preparation of 1348 comments section.

## 4.0 ACTION

This document applies to all HWF personnel who enter data into the EWBATS system for the disposal of HW and HM in accordance with federal and state regulations.

## 5.0 DEFINITIONS

- a) **HWF Facility** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **CSW**- Containerized Solid Waste
- c) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- d) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- e) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.
- f) **PBC**- Profile Based CLIN

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Report to and assist the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Report any non-compliance with this SOP to the CM.
- d) Ensure that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procure the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procure supplies needed to prepare HW for transportation on the public highway.
- g) Train HWF personnel on the proper use of PPE and response equipment.
- h) Ensure unsafe work conditions and operational deficiencies are corrected.
- i) Create all DD 1348 documents in EWBATS per this SOP.

### 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### 6.3 Customer Service/Administration

- a) Reports to and assist the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this Standard Operating Procedure.

## 7.0 DIRECTIONS

- a) Log on to <HTTPS://c27websdns01.navfacsw.navfac.navy.mil>
- b) Click "I Consent" to DOD warning and consent
- c) Click on "EWBATS 3"
- d) Click "OK" to "US DEPARTMENT OF DEFENSE WARNING STATEMENT"
- e) Enter PIN number to log on to windows
- f) Enter user ID and PASSWORD for NAVFAC SW-EWBATS
- g) Click "OK" ("NOW CONNECTING TO EWBATS")
- h) Click "Tracking" and select either "90 day tracking" or "365 day tracking"
  - Select Facility and drum number. Click Retrieve
  - Type in appropriate DTID in the field "DTID"
  - Assign accumulation start date in "Accum date" field
  - Click "Process" then "Update"

- l) Click "Tracking" and select "Contract 1348"
- Select "Pickup Facility" in drop down menu
  - Click "New"
  - Select "Pickup Facility"
  - Type in Julian date in "Julian Date" field
  - Type in Serial number (i.e. 9000) in "DISPNO" field. If everything was properly tracked, most fields should prepopulate (i.e. Profile number, accumulation start date)
  - Select the PBC that best describes your waste stream in the CLIN drop down menu
  - Enter the Quantity (weight) in the "Quantity" field
  - Select the unit of measurement in the "Unit" Field
  - Enter the total number of containers in the "No. of Containers" field
  - Enter up to three container numbers in the "Container No(s)" field. Additional numbers will need to be added in the notes section.
  - Enter the container location (i.e bay number) in the "Container Loc." Field
  - Select the container size in the "Container Capacity" drop menu
  - Select the container type in the "Container Type" drop menu
  - Enter the number of containers in the "AMT" field
  - Review all waste codes associated with the profile and make sure it matches the waste stream for the 1348.
  - Select proper waste codes by clicking the drop menus marked "EPA Codes"
  - Select proper state code by clicking the drop menu marked "State Codes". If an appropriate State Waste Code is not on the profile, determine if another profile is a better fit. If no profile matches, work with the Profile Specialist to create a profile for the waste.
  - Check to ensure the proper PSN is selected and choose the UN number applicable to the waste stream in the "DOT Number" field

Enter additional information in notes such as MSDS information, additional drum numbers and Information on DEMIL D and F items

- j) The DOT Proper Shipping Name that best describes the waste should be used even if the PSN used on the generic profile is different.
- k) The generator is required to provide the National Stock Number (NSN) and demilitarization instructions for DEMIL F and DEMIL D items (DoD 4160.28) such as submarine hull tiles and chemical agent detection kits. You may contact DLA for assistance researching DEMIL instructions
- l) Click on "Update" to save information
- m) Click on "Close" when complete or "+ New" to start a new DD 1348.
- n) Once all 1348's are complete, and reviewed using the DD Form 1348-1A QC Checklist (Enclosure 5), the HWF Supervisor must send an email to the Designated Government

Representative identifying the 1348's that are ready for review. Prior to being reviewed, the document will show "Not Reviewed" (Enclosure 1).

- o) Once the document(s) have been approved (Enclosure 2) - print, sign, make a copy, and send them to DLA.DS.

**NOTE:** Keep in mind that the document **MUST** show the "APPROVED BY" information (see Enclosure 2) at the lower left corner of the document. DLA DS will not accept these request documents without it.

#### 7.1 **Waste Rejected by IWTP/OWTP or Fleet Industrial Supply Center (FISC)**

It is the responsibility of the Service Provider to divert as much waste as possible to the on-site treatment plant. The 'List of Waste Acceptable for On-site Treatment at the IWTP/OWTP" (Enclosure 3) should be referenced to determine if a waste is acceptable for treatment. The Supervisor will complete a plant Waste Acceptance Form (Enclosure 4) and submit that to the plant for review by the Service Provider's chemist for approval or rejection. If rejected by the plant, the WAF will be returned to the Supervisor with the reason for the rejection of the waste written on the WAF. To demonstrate to the RO that the waste was offered to the plant prior to offering it to DLA DS for disposal, the DD 1348 comment section must include: **REJECTED: (reason for rejection)**

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# STANDARD OPERATING PROCEDURE

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**Subject:** Bulking into Drums

**References:** (a) Code of Federal Regulations, Title 40 Part 261 - 263  
(b) California Code of Regulations, Title 22 Part 66261 - 66263  
(c) Code of Federal Regulations, Title 49  
(d) Code of Federal Regulations, Title 49 §173.168

**Enclosures:** (1) CSW-005 (Waste Turn-In Form)  
(2) CSW-006 (Hazardous Waste Profile Sheet)  
(3) CSW-007 (Hazardous Waste Label)  
(4) CSW-076 (Bulking Evaluation Form)  
(5) CSW-008 (Profile Summary)  
(6) CSW-009 (Off-Base Hazardous Waste Label)  
(7) CSW-016 (Container Contents Packing List)  
(8) CSW-077 (Drained Oil Filter Label)  
(9) CSW-038 (Smash It Compactor Operating Instructions)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed for Service Provider personnel providing environmental services under contract N62473-10-D-4009 and describes guidelines for bulking hazardous material managed under that contract.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM.

## 3.0 SCOPE

This SOP gives guidance to personnel and defines HW bulking procedures. Drum bulking is accomplished by combining like waste into drums in preparation for transport. This SOP describes the major tasks in the process from qualifying which materials are good candidates for consolidation to proper labeling of the consolidated materials and documentation. Empty container management after bulking is described in SOP HW-05-010.

## 4.0 ACTION

This document applies to all HWF personnel performing waste consolidation and bulking services on contract N62473-10-D-4009.

## 5.0 DEFINITIONS

a) **APR** – Air purifying respirator.

- b) **HWF** – Hazardous Waste Facility - a consolidation, storage, and transfer facility for HW and HM.
- c) **CSW**- Containerized Solid Waste.
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.
- f) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## **6.0 RESPONSIBILITIES**

### **6.1 HWF Supervisor (Supervisor)**

- a) Reports to and assists the CSW Manager (CM).
- b) Responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procures the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procures supplies needed to prepare HW for transportation on the public highway.
- g) Trains HWF personnel on the proper use of PPE and response equipment.
- h) Ensures unsafe work conditions and operational deficiencies are corrected.
- i) Creates all DD 1348 documents in EWBATS per this SOP.

### **6.2 HWF Leader/Disposer (Leader/Disposer)**

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### **6.3 Customer Service/Administration**

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this SOP.

## **7.0 PROCEDURES**

### **7.1 Criteria for Determining if the Material is a Good Candidate for Consolidation**

- a) Not all wastes should be consolidated. Some chemicals pose significant health and safety risks. For others, there is not enough information about the container to know how to handle

it correctly. Consolidation of some related compounds could make disposal more rather than less expensive. The information in this section is written to help you make this decision.

- b) The Profile Summary (Enclosure 5) is used to help categorize waste streams by profile code. All information about a given container (label, MSDS, visual inspection or field test results) must be consistent with the profile code for a container to be considered for consolidation. The process for handling a waste falls into one of four categories described below in sections 7.1.1 through 7.1.4. If there is any doubt about whether to consolidate a material ask for Supervisor authorization.

#### **7.1.1 Items that shall not be consolidated:**

- a) Materials considered radioactive, explosive, or biologically infectious. (Note: These materials are not to be managed on this contract. Contact the Supervisor immediately.)
- b) Mercury Compounds (HA12, HT14, HT76).
- c) Odiferous Chemicals such as mercaptans and ammonia (HB22).
- d) DOT 4.2 or 4.3 Hazardous Materials (HR21, HR22, HR25, HR81).
- e) EPA D003 Materials (HR11, HR12, HR13, HR24, HR26, HR61, HR62, HR63, HR71, HR90, LR26).
- f) DOT Packing Group I Hazardous Materials (HA13).
- g) Peroxide Forming Substances such as ethyl ether & tetrahydrofuran.
- h) Organic Peroxides (HO51, HO52, HO53, H054).
- i) Waste containing Hydrofluoric Acid.
- j) Hydrazine and its Compounds (HB12).
- k) Polymerizable Compounds including Isocyanates (HT88, HI21).
- l) Others (HS41, HS51, HT60, HT61).

#### **7.1.2 Materials Requiring Health and Safety Review Prior to Consolidation**

The materials (and associated profile numbers) listed below may be consolidated, but only after a formal review of relevant documentation, inspection of the primary containers, and evaluation of the health and safety aspects of the process. The review process is documented using the Bulking Evaluation Form (Enclosure 4) per section 7.1.6 All liquids consolidated under this section must undergo the bucket compatibility test described in section 7.1.5.

- a) Organic or inorganic acids (HA11, HA21, HA23, HA51, HA52).
- b) Organic or inorganic bases (HB11, HB21, HB32, HB41, HB43, HB44).
- c) Oxidizers (HO11, HO21, H031, HO41, HO71, HO72, HO73).
- d) Others (HI31, HI33, HI34, HI35, HS31, HS61, HT44, HT48, HT52, HT53, HT62, HT80, HT81, HT83, HT84, HT85, HT86, HT90, HT91, HT92, RT71).
- e) Any materials not specifically listed under section 7.1.3 or 7.1.4.

#### **7.1.3 Materials Requiring Additional PPE, Equipment, or Steps Beyond that Described in 7.1.4 Prior to Consolidation**

- a) **HB31, HB35** - Some wastes within the profile could be chemically incompatible. SDS must be reviewed to ensure proper skin and respiratory protection is used. Requires an eye wash to be accessible.
- b) **ND11, NL12** - Some wastes within the profile could be chemically incompatible. If mixing different materials under the same profile, perform the bucket compatibility test per 7.1.5.
- c) **HA31, HA41, HA61, HE41** - This waste stream contains corrosive materials. An eye wash and adequate dermal protection must be in place before managing the material.
- d) **HT33** - This waste stream contains corrosive materials. An eye wash and adequate dermal protection must be in place before managing the material. It also presents a cut hazard. Leather gloves must be worn in combination with gloves to protect from the dermal hazard corrosive hazard.
- e) **HR51** - This waste stream should not normally be consolidated. If a broken bulb is found during the QC process of UW22, it can be packaged with other HR51 or placed in a new container. Adequate precautions must be taken to account for the sharp edges, lead toxicity and water reactive sodium hazards. Leather gloves are required when handling them.
- f) **UW22** - Low Pressure Sodium lamps are fragile and if broken, present a laceration, toxicity and water reactivity hazard. Consolidation activity should be done in an area away from moisture and over a surface which will minimize the possibility of breakage. Leather gloves are required when handling them.
- g) **UW42** - Fluorescent lamps are fragile and if broken, present a laceration and mercury toxicity hazard. Consolidation activity should be done over a surface which will minimize the possibility of breakage. Leather gloves must be worn when handling them. Broken fluorescent lamps are managed as a hazardous waste. See HT42 below.
- h) **UW76** - Materials characterized as UW76 are sealed and contain small quantities of elemental mercury. If upon inspection, any of the contents are found to be leaking, the CM must be contacted immediately and the container must be reclassified as HT76. The container must be sealed as quickly as possible. If any handling is required, then an air purifying respirator (APR) with mercury vapor cartridges must be worn.
- i) **UW78** - Cathode Ray Tubes (CRTs) and devices containing them contain toxic metals and when broken, present a laceration hazard. Leather gloves are required when handling them. When broken, CRTs are managed as HT45.
- j) **HE11, HI11, HI12 [See 7.1.3 t)], HI13, HI14, HI15, HP11, HP31 HP51, HS21, and RP15** - These flammable materials present an ignition and inhalation hazard. Careful set up considerations must be made to ensure good ventilation and sources of ignition, including battery operated tools, are kept at a distance of at least 20 feet. Bonding and grounding equipment is tested and used to prevent static build up while transferring material and respiratory protection is used.

- k) **HE31, HE51, HE52, HE53, HP31, HS11, HT46, and HT87** - Toxic aerosols & solvents present an elevated toxicity risk. The MSDS must be reviewed to ensure proper respiratory protection is used. The set up must provide good ventilation and if applicable, ignition sources must be controlled. Not all materials under these profiles are good candidates for consolidation.
- l) **HT41, HT82, and NL41** - The MSDSs of materials must be reviewed carefully to ensure compatibility and PPE issues are taken into account. Follow 7.1.5 when consolidating.
- m) **HT21** - Asbestos should only be consolidated if all the material is properly wetted and still in double bagged containers.
- n) **HT36, UW30, UW31, UW32, UW33, UW34, UW37, UW35, UW38, and UW39** - Batteries contain corrosive constituents and could still have an electric charge. Batteries must not be handled in an area where organic vapors are present. Batteries of different types cannot be packaged together. The terminals must be taped or otherwise prevented from short-circuiting during storage or transportation. Batteries connected in series must be separated before packaging. Lithium batteries must be packaged in a metal outer container.
- o) **HT42** - Broken fluorescent light tubes contain mercury vapor and sharp edges. If containers of UW42 are found to contain broken lamps, they must be separated and managed as HT42. Partial containers of HT42 are not to be consolidated. Handling this material and its exposure to the atmosphere should be kept to a minimum. Workers must wear an APR with mercury vapor cartridges. Leather gloves are required when handling them.
- p) **RT16** - See SOP HW-05-013.
- q) **RT61** - See SOP HW-05-015.
- r) **HO61, HR41, and HR42** - If unspent, Emergency Escape Breathing Devices (EEBD), Oxygen Breathing Apparatus (OBA) canisters, and Oxygen Candles require packaging, labeling and marking in accordance with DOT requirements found in reference (d). Personnel packaging, repackaging, or preparing materials under these profiles must have had training on the referenced DOT requirements. Materials under profiles HO61, HR41 and HR42 will be made to comply with the requirements of this section before the end of the day they are opened. Materials found not complying, will be immediately reported to the Supervisor.

**Reference (d)** specifies acceptable means of preparing this waste for shipment:

- Intact mechanical/chemically actuated devices must be prevented from accidental actuation by two independent means. This may be two pins, a pin and retaining ring or a pin and securely attached cover.
- Electrically actuated devices must have the electrical leads mechanically shorted and then shielded in metal foil.

- Devices without a means of actuation must have a cover over the primer to prevent actuation from external impact.
  - Oxygen generators installed in equipment must have actuating pins in place and be enclosed in a protective bag, pouch, case or cover. The outside container must have the following statement marked on the outside: "This Item Contains an Oxygen Generator".
  - Before packaging, they must be capable of sustaining a 1.8 meter fall in a manner most likely to cause accidental actuation without actuating.
  - The shipping container must comply with 49 CFR 173.212.
- s) **RT31, RT32** - Used oil filters will be removed from the receiving container and drained to ensure they contain no pourable used oil prior to being repackaged and sent for recycling. Typically this is accomplished as follows:
- Used filters are removed from the receiving container.
  - Used filters are inverted on a drip pallet and allowed to fully drain.
  - Once fully drained, the filters are placed in a 55 gallon open-top drum which is labeled "Drained Used Oil Filters" (Enclosure 8). The label is specifically designed for this waste stream. It is not a standard "Hazardous Waste" or "Non-Hazardous Waste" label.
  - The drip pallet is labeled using a "Hazardous Waste" label and kept closed unless oil filters are being added or removed. The drip pallet is cleaned when not in use.
- t) **HI12, HP22** – Saturated paint & adhesive debris and absorbents and saturated oily rags, debris and absorbent may be compacted. See Enclosure (9) CSW-038 Smash-It Compactor Operating Instructions.

**7.1.4 Procedures Applicable to All Consolidation Activity including: HE21, HI20, HI41, HP21, HP22 [See 7.1.3 t)], HP41, HS52, HT13, HT15, HT40, HT45, HT47, HT70, HT71, HT72, HT73, HT74, HT75, ND12, ND13, NL11, NL13, NL15, NL16, NL17, RB21, RP12, RT30, RT51, RT55, UW77, and HT11.**

- a) Identify the chemical to be poured or pumped. Identification needs to be performed from container label, waste turn-in forms, SDS's, analysis, and any other applicable documentation.
- b) If any container is unlabelled, or it's characteristics are not consistent with that expected, the Supervisor must be immediately notified and the container must be treated as an unknown. (See SOP HW-05-024 Procedure for Unknowns)
- c) Determine that the combination of consolidated materials will meet the description of and existing profile including applicable waste codes.
- d) Set-up work area in designated area to minimize hazards and post activity decontamination.
- e) Obtain approval from Supervisor.
- f) Don appropriate PPE before performing operation.
- g) Open each waste container in the process area. Visually verify the contents.

- h) Take precautions not to spill or splash any of the waste.
- i) Add "ATTENTION — THIS CONTAINER HAZARDOUS WHEN EMPTY" sticker if applicable (refer to SOP HW-05-010).
- j) Remove Hazardous Waste and DOT Hazardous Waste labeling from empty container(s).
- k) After the residue has been removed from each container, place the empty containers in the appropriate recycling or waste bin. (Refer to SOP HW-05-010).
- l) Close the container.
- m) Decontaminate the work area, including the outside of the consolidation drum and properly dispose of PPE.
- n) If the area will be left unattended for any reason outside of emergency evacuation and for any period of time, all containers must be labeled and closed.
- o) Aerosols for recycling or disposal; The packaging must comply with 49 CFR 173.24 and 173.24a with a gross mass less than 500 kg. Each aerosol must be packaged with a protective cap to protect the valve stem or have the stem removed.
- p) All battery terminals must be covered with non-conductive tape or otherwise prevented from short-circuiting.
- q) Write the number or description of the of the repository container in the "Drum #(s)" column on the Waste Turn-In Form (Enclosure 1).

#### **7.1.5 Bucket Compatibility Test**

The bucket compatibility test is a process to confirm chemical compatibility for two materials before they are consolidated.

- a) When consolidating into a drum with material already in it, take a representative sample of the material from the drum and place it into a clean bucket.
- b) Take a small sample (two to three ml) from the container to be consolidated and add it to the bucket.
- c) Observe for signs of a reaction for 15 seconds (examples: boiling, splattering, evolution of heat, smoke, steam, mist, solidification).
- d) For each subsequent container, add a small sample to the bucket and observe for signs of a reaction as above.
- e) If a potential reaction is noted, stop consolidation and get the Supervisor.
- f) If the bucket becomes more than half full and no reactions were noted, pour the bucket into the consolidation drum. Take a representative sample from the drum and continue the process of compatibility testing for the remaining containers to be consolidated.

#### **7.1.6 Health and Safety Review**

- a) The Supervisor completes the Item Description, Profile, Container ID, Amount, Supervisor Pre-bulking Inspection and Document Review portions of the form.

- b) The form and copies of all MSDS, Analytical reports, field test results and any other relevant information are given to the CM or Compliance/QC Manager for review.
- c) The CM or Compliance/QC Manager works with the Supervisor to determine if the material can be consolidated safely and what steps need to be performed prior to consolidation.
- d) The CM or Compliance/QC Manager signs the form specifying additional required steps.
- e) The Supervisor and each member of the crew performing the consolidation sign the form prior to beginning work.
- f) If the consolidated material is to be treated at the IWTP, approval from an IWOW Representative must be obtained.

#### **7.1.7 Pressure Relief Devices**

The steps outlined above are designed to prevent reaction of waste. **HI11, HT70, HT71, HT72, HT73, HT74, HT75, and ND13** waste streams have the potential to generate gases and accumulate pressure after consolidation. Pressure release devices will be placed on storage containers of those waste streams for at least the 24 hours following consolidation to prevent a build up of pressure in the container. Any evidence of pressure buildup or activation of the pressure relief device must be reported to the CM immediately upon discovery.

### **8.0 IMPACTS/CONSEQUENCES OF DEPARTURE FROM REQUIREMENTS**

Failure to follow prescribed procedures may result in the creation of hazardous conditions. HM may be released to the environment and employees may be exposed, leading to injury. Incorrect bulking of wastes can also result in regulatory violations and the assessment of fines.

### **9.0 DOCUMENTATION REQUIREMENTS**

#### **9.1 Waste Turn-In Forms**

- a) Each HW destined for bulking requires a complete Waste Turn-In form(s) (Enclosure 1).
- b) Write the number or description of the repository container in the "Drum #(s)" column on the Waste Turn-In Form (Enclosure 1).
- c) Additional information that should be on the Waste Turn-In form(s) is:
  - Field test results (visual check, ph test, PID meter readings)
  - Copies of SDS & or analytical as required (see below)

#### **9.2 Safety Data Sheets (SDS)**

In most cases, the HW will have a SDS with the item being bulked.

#### **9.3 Lab Analysis Reports**

Occasionally, certain HW for bulking will have lab analysis reports to facilitate proper disposal.

The following types of waste will require analysis:

- a) Mixed or consolidated HW from processes.
- b) Products that have been used for their intended purposes (i.e. cleaners, degreasers, etc.).
- c) Non-routine and open purchase HW lacking documentation.

#### **9.4 HW Profile Sheet**

Standardized profiles for bulking waste streams are maintained and are on file. All streams to be

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These standard policies and procedures are applicable to all Operator personnel, except where superseded by regulations or Navy requirements.

bulk should have all pertinent information of the materials coming in, and be sampled for verification analysis in accordance with the Waste Analysis Plan.

#### **9.5 Use of Packing List on Consolidated Drums**

A Container Contents Packing List (Enclosure 7) used to record the control numbers of the materials consolidated into each drum. This is secured to the outside of the drum with a packing envelope.

#### **10.0 HW Container Packaging, Marking and Labeling**

HWF personnel will bulk HW into containers which meet the DOT requirements for transportation over public roads.

#### **10.1 Bulking Containers**

HW transported on public highways must be packaged in containers that meet DOT specifications. Reference (c) outlines the specific requirements for DOT packaging. At a minimum, DOT packaging must meet the following conditions:

- a) Packaging must be in sound condition, free from rust, dents and leaks.
- b) Lids on all containers must be sealed tightly and have all bungs, nuts and bolts in place to prevent the release of HW or volatile organic compounds.
- c) Whenever possible, all liquid HW should be packaged in closed top containers.
- d) Corrosive liquids should be packaged in closed-top poly containers; however, steel containers may be used if appropriate plastic liners are in place.
- e) Corrosive solids must be packaged in open-top poly, plastic lined steel, or plastic lined fiberboard containers.
- f) HW must be packaged and staged in a manner that completely segregates the incompatible HW.
- g) Containers must meet the packing group requirements found in Reference (c).
- h) Containers must be marked with DOT specifications, which are in a visible location on the container.
- i) For containers of aerosols with a gross weight exceeding 66 pounds, the requirements of DOT-SP-12842 must be met before shipment.

#### **10.2 Container Marking**

- a) All containers transported across public highways will display DOT approved markings. Reference (c) defines marking and labeling as separate requirements. See Enclosure (3) for a sample label that contains DOT marking information.
- b) All containers being transported across public highways shall be labeled in accordance with Reference (c).

#### **11.0 End of Day Procedures**

At the end of each working day, it is imperative that the consolidation area(s) be policed and all HW properly labeled and stored. Items to watch for are:

- a) All containers are closed and sealed — no open containers.

- b) All waste containers have properly completed labels attached.
- c) All waste hoppers and storage trays are covered or tarped.
- d) All pallets of waste to be bulked are covered and the cover has the proper label and shows the correct Accumulation start date.
- e) All waste is properly stored with a minimum of 36" aisle space.
- f) All empty bulking containers will be properly managed (refer to SOP HW-05-010)  
Inspect all areas to ensure no incompatible waste is stored together.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Waste Profiling for Acceptable Wastes

**References:** (a) Code of Federal Regulations, Title 40, Part 264.13  
(b) California Code of Regulations, Title 22, Part 66264.13  
(c) HWF Permit Analysis Plan  
(d) Environmental Waste Billing and Tracking (EWBATS) Database

**Enclosures:** (1) CSW-005 (Waste Turn-In Form)  
(2) CSW-006 (Hazardous Waste Profile Sheet)  
(3) CSW-075 (Generator Profile Update and Certification Form)

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## 1.0 PURPOSE

This Standard Operating Procedure (SOP) was developed for Service Provider personnel providing environmental services under contract N62473-10-D-4009 and describes guidelines for acceptance of Hazardous Waste (HW) and Hazardous Material (HM) for disposal.

## 2.0 BACKGROUND

The Service Provider provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all military bases, U.S. Navy ships located in off-site private shipyard repair facilities, and federal contractors in the San Diego area under contract N62473-10-D-4009. The Environmental Protection Agency has established regulations governing the management of hazardous waste. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Service Provider employees have been trained in the identification and safe handling of HW and HM. The Service Provider conducts operations within the regulatory boundaries established in References (a) through (c). The procedures set forth in this SOP are designed to ensure that Service Provider and government customers conduct business in compliance with the references.

## 3.0 SCOPE

This SOP contains profiling procedures and policies, which were developed to simplify the process of turning in HW and HM for disposal. Additionally, this SOP defines the process for turning in HW and HM for disposal.

## 4.0 ACTION

This document applies to all HWF personnel performing services on contract N62473-10-D-4009.

## 5.0 DEFINITIONS

- a) **CSW-** Containerized Solid Waste.
- b) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- c) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.

- d) **HWF** - Hazardous Waste Facility - a consolidation, storage, and transfer facility for HW and HM.
- e) **Label** - the shape of a diamond and it measures 3.9" on each side. The label specifies the primary and subsidiary hazardous classes for the HW. Labeling requirements can be found in the Title 49 Hazardous Materials Table &172.101, with additional information available in Subpart E of reference (c).
- f) **Marking** - a descriptive name, identification number, instructions, cautions, weight, specifications, or UN marks, or combinations thereof, and are required to be placed on the outer packaging of HM and HW.
- g) **Service Provider** – The company or entity operating HWF facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N68711-03-D-4302.
- h) **Waste Turn-In Form** – is an accounting document used to bill activities' accounts for management of their HW.

## 6.0 RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Reports to and assists the CSW Manager (CM).
- b) Be responsible for overall compliance of the HWF with this SOP.
- c) Reports any non-compliance with this SOP to the CM.
- d) Ensures that HWF personnel are proficiently trained on the procedure and guidance established in the SOP
- e) Procures the proper personal protective equipment (PPE) and appropriate response equipment for routine and emergency HW management.
- f) Procures supplies needed to prepare HW for transportation on the public highway.
- g) Trains HWF personnel on the proper use of PPE and response equipment.
- h) Ensures unsafe work conditions and operational deficiencies are corrected.
- i) Creates all DD 1348 documents in EWBATS per this SOP.

### 6.2 HWF Leader/Disposer (Leader/Disposer)

- a) Reports to and assists the Supervisor as required.
- b) Understands and complies with the procedures and guidance established in this instruction.
- c) Performs all work in a safe manner so as not cause personal harm or injury, or endanger the health and safety of others.
- d) Verifies HW being turned in by generators by inspecting all containers for accuracy and reviewing all supporting documentation for the purpose of accurate identification and characterization of HW.

### 6.3 CSW Profile Specialist (Profile Specialist)

- a) Understands and complies with procedures and guidance established in this SOP.

- b) Understands and complies with 40CFR and Title 22 waste characterization requirements.
- c) Prepares all profile documentation for government review (DGR and DLA DS).
- d) Pushes out all profile documentation to field staff.
- e) Provides direction to all personnel when needed for the purpose of performing duties in compliance with this SOP.

## 7.0 PROCEDURES

Pick-ups or deliveries of HW and non-HW are received at the HWF from a variety of sources. The HWF receives wastes from routine industrial process and maintenance activities, and disposal of off-spec or unused materials. For each waste stream received from its customers, the HWF maintains a file of waste characterization documentation. The documentation includes a Waste Turn-In Form (Enclosure 1) for shipments of on-site waste and a HW Manifest for shipments of off-site waste. Each Waste Turn-In Form identifies customer information, an existing EWBATS profile for the waste, and is accompanied by analytical data or other documentation of customer knowledge. This knowledge may be documented by any or all of the following:

- a) Customer knowledge of the products and materials that comprise the waste stream based on SDSs and knowledge of the waste-generating process.
- b) Customer certification statement based on their knowledge of the waste generation process from historical documents, data and knowledge.
- c) Analytical data.

Some customer wastes have waste characterization data that are based on their knowledge of process and analytical data (e.g. SWRMC). Based on the waste characterization results, the waste is assigned a profile number. The Leader/Disposer will confirm the profile number for wastes based on field tests on each waste shipment that is received at the HWF. This profile number is recorded on the Waste Turn-In Form.

### 7.1 Customer Waste Characterization Updates

The HWF accepts waste based on customer waste characterization data that is subject to field verification and periodic analytical confirmation. The WAP requires that waste characterization data is updated for the following conditions:

- a) The process or operation generating the waste has changed.
- b) Product formulations for products that affect the waste generating process have changed (based on SDS) as applicable to the profile basis.
- c) Field testing or new analytical data results do not match the established profile. (See Section 7.2)

If analytical data is an update to existing waste characterization data, the Service Provider will update the profile files and document the changes as part of the facility operations records, as well as notify the RO and DLA DS of these changes and request changes be made in EWBATS.

### 7.2 New Profile Assignment and Approval

The CM or Profile Specialist reviews the new waste characterization data sheets as the need is identified. These waste characterization data sheets must be based on documented knowledge of the generating process and that process must be repetitive and uniform enough that a variability range can be established. A new waste characterization data sheet must be based on reviews of analytical data or other customer documentation (such as SDS documents, generation process, etc.) to determine whether the waste stream can be assigned to an appropriate existing profile number or whether a new profile should be created. The customer will be requested to provide enough information so that the CM or Profile Specialist may confirm that the waste stream is adequately characterized (SDS, audit of generating process, and/or analytical data). The following process will be used.

- a) Consult with the Profile Specialist to identify what analytical tests are needed to adequately characterize the waste.
- b) Review waste characterization information to ensure that proper EPA and or California waste identification numbers have been assigned.
- c) Develop a new waste profile data sheet for submittal to the DGR.
- d) Give a hard copy of the new sheet to the DGR for review and approval. The DGR will determine the appropriate profile number. The DGR will also determine the pricing and “type service” for a new profile and will enter the profile information into EWBATS.
- e) Once in EWBATS, the Service Provider will update the profile books and provide training to HWF staff.

### **7.3 Profile Management**

The Profile Specialist will maintain the waste profiles in the HWF central files. The Profile Specialist will organize the files by profile and will include waste characterization data information for each. At the customer’s request, copies of the profiles will be distributed to be maintained at their location. The Profile Specialist will maintain a spreadsheet that lists the customer name, waste characterization information, profile number, waste stream, and the analytical testing date. This spreadsheet will be used to manage profile information. This will allow a cross-reference between the customer profile and the WAP waste stream.

#### **7.3.1 Profile Management Review**

The Service Provider will review the profiles in the HWF central files annually. The Service Provider will review waste characterization analytical data or other customer knowledge documentation to verify the following:

- a) The waste characterization data accurately reflect the analytical data, and the appropriate EPA and State Waste ID Codes.
- b) The generation process has not changed.
- c) The profile number associated with the waste characterization data accurately assigns the appropriate EPA and State Waste ID Codes.

- d) Profile cross-reference lists are appropriate based on analytical data, waste name, and waste ID codes.

**7.3.2 Waste Characterization Review**

Field tests are performed on each waste shipment received to:

- a) confirm waste characterization information that is key to waste treatment;
- b) to optimize treatment processes; and
- c) to verify generator information.

The profiles to be verified will be determined based on the most frequently received waste streams, the perceived potential for variability, and discussions with generators. Waste streams where field verification tests or random samples have previously indicated discrepancies with the generator provided information on waste characteristics will have a higher likelihood of periodic analytical verification.

**7.3.2.1 Waste Characterization Review Sampling**

To perform the waste characterization review, the Profile Specialist takes a representative sample from at least one delivery a year. The schedule for sampling is developed annually by the CM and is based on both the volume of the waste and the likelihood of variability from existing profiles. An ELAP certified laboratory will be used to identify all contaminants present in the waste stream profile. The appropriate analyses are specified per waste stream based on the waste description and generating process. The analyses typically could include the following:

Contaminant	Test Method*
Flashpoint (ignitability)	EPA 1010
pH	EPA 9040
Title 22 metals	EPA 6010/EPA 1311
Mercury	EPA 7470
Cyanide, total	EPA 335.2
Total Toxic Organic Halogens	EPA 9020M
PCBs	EPA8082
Volatiles	EPA 8260
Semi volatiles	EPA 8270
Toxicity	CA Title 22

\*The latest promulgated version of the test method specified will be used or an equivalent alternative as designated by the Profile Specialist.

If a waste profile verification analysis shows that the waste analyzed does not match generator profile data, a second verification sampling event will be performed for that profile. If inconsistency is still present, updates will be completed based on the analytical data.

For generator specific profiles, the customer will be contacted to revise the profile and provide additional documentation, including California ELAP certified laboratory analyses for parameters specified by the CM or Profile Specialist and/or appropriate MSDS information.

The customer will be asked to help re-characterize the waste and help complete a Hazardous Waste Profile Sheet (Enclosure 2). Once approved the Service Provider will file the revised profile, data and file copies with the customer and send a copy with a cover letter to DLA DS stating the changes made and actions to be taken.

The Service Provider will update customer profiles with the analytical data. Superseded data will also be retained in the HWF Central Files.

### **7.3.3 Customer Waste Characterization Certification**

Customers with established waste characterization data will be required to recertify their waste profiles every year by submitting a Customer Update and Certification Form (Enclosure 3). The customer's signature on the waste characterization data sheet documents their knowledge of the waste characteristics of their waste stream. The customer may elect to provide new analytical data in support of the recertification, or base the certification on process knowledge if field verification tests or waste characterization reviews indicate discrepancies with customer waste characterizations on file.

### **7.4 Unacceptable (not permitted) wastes**

The Service Provider is not permitted to process the following items as HW.

- a) High or low-level radioactive waste material.
- b) Biohazardous wastes, sewage, urine and feces.
- c) Medical wastes, drugs, needles, and sharps.
- d) Explosives, ammunition, and pyrotechnics.
- e) Trash, wet garbage and inedible food.

**Note:** Most of the above items are handled by other Navy activities under a variety of special programs. The Service Provider will accept some pharmaceutical waste for disposal providing they do not meet the definition of controlled substances. Acceptance of pharmaceutical medical waste will be determined on a case-by-case basis. Disposers must obtain the Supervisor's approval before accepting pharmaceutical medical waste for disposal.

### **7.5 Documentation Requirements**

#### **7.5.1 Waste Turn-In Forms**

- a) Each turn-in requires the completion of the customer section of the Waste Turn-In Form (Enclosure 1).
- b) Disposers will complete the "Use" section of the Waste Turn-In Form and if necessary, will provide guidance to customer personnel on the completion of the "Customer Use" section.

- c) Each form must have a valid Control Number (see Enclosure 2) before HWF personnel can pick up the waste.
- d) A copy of the Waste Turn-In Form (pink copy) will be left with the customer representative at the time of the turn-in. This copy serves as a receipt for wastes that were turned in for disposal.
- e) Disposers will characterize the HW being turned in, assign a profile number, and will weigh each waste type (by hazard class or profile) individually, documenting the weight on the Waste Turn-In Form.
- f) Disposers will select an appropriate "type service" code for each HW type.

**Note:** The commodity rate (type service) is based on the profile number, hazard class, and quantity of waste that is being turned in for disposal.

**Note:** For wastes that do not have a profile or profile numbers that do not have type service codes, the Disposer must contact the Supervisor for guidance.

### 7.5.2 Safety Data Sheets (SDS)

In some instances the customer's HW Coordinator may be asked to provide SDS' when turning in HW. SDS' will be required if the HW is:

- a) Open Purchase, lacking a Navy stock number (NSN).
- b) Non-routine waste.
- c) Mixed or consolidated HW for which the components are known.

### 7.5.3 Lab Analysis Reports

Occasionally, certain HW will require lab analysis reports to facilitate proper disposal. Lab services can significantly impact the final cost of HW disposal. Therefore, it is important for customer personnel to keep accurate documentation of all HM. HWF personnel will provide technical assistance for ordering sampling services, required analytical tests, or documentation necessary to properly characterize the HW. To obtain technical assistance, customer representatives should contact the Service Provider at 619-545-6520. The following types of waste require analysis:

- a) Mixed or consolidated HW from processes.
- b) Unknown HW.
- c) Non-routine and open purchase HW lacking documentation.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Small Rechargeable Batteries for Recycling

**References:** (a) Code of Federal Regulations, Title 40 Part 273  
(b) California Code of Regulations, Title 22, Part 66273  
(c) Code of Federal Regulations, Title 49 Parts 171-180  
(d) SOP HW-05-011

**Enclosures:** (1) CSW-084 Call2Recycle Site Contact List  
(2) CSW-087 Marking for Li-Ion Batteries  
(3) CSW-089 Example of NiCd Battery Label  
(4) CSW-090 Example of NiMH Battery Label  
(5) CSW-092 Example of Lithium Ion Battery Label  
(6) CSW-093 DOT-SP 14849 Shipping of Rechargeable Batteries (exp 12/31/15)

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## 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with instructions for shipping rechargeable batteries for recycling.

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

Call2Recycle is a product stewardship program funded by the battery manufacturing industry to facilitate the recycling of rechargeable batteries and discarded cell phones.

## 3. SCOPE

This procedure defines the guidance for HWF personnel to recycle batteries through Call2Recycle.

## 4. ACTION

This procedure applies to HWF personnel receiving, shipping and otherwise managing recyclable batteries.

## 5. DEFINITIONS

- a) **Call2Recycle** is a rechargeable battery and cell phone recycling program operated by Rechargeable Battery Recycling Corporation (RBRC).
- b) **C2R Site ID#** - a number assigned to a specific generating location by Call2Recycle for the purpose of tracking and arranging for shipment of recyclable batteries.
- c) **DOT-SP 14849** is a DOT special permit issued to RBRC for transport of small quantities of recyclable batteries.

## 6. RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Responsible for overall compliance of the HWF with this SOP.
- b) Reports any non-compliance with this SOP to the CSW Manager (CM).
- c) Ensures that HWF personnel are proficiently trained on the procedures and guidance established in this SOP.
- d) Train all employees, managing rechargeable batteries, on DOT-SP 14849.

### 6.2 HWF Leader/ Disposer (Leader/Disposer)

- a) Understands and complies with the procedures established in this instruction.
- b) Performs all work in a safe manor so as not to cause personal harm or injury, or endanger the health and safety of others.
- c) Understands the associated hazards, and takes the necessary health and safety precautions.
- d) Reports observed and perceived non-compliance with this instruction to the Supervisor.
- e) For batteries shipped to Call2Recycle utilizing boxes provided by them, follow requirements listed in DOT-SP 14849 (see enclosure 6).

## 7.0 PROCEDURES

### 7.1 Packaging and Labeling Per Battery Type

- a) **Nickel Cadmium Batteries** are a type of rechargeable battery which contain nickel and cadmium compounds. They are made in many sizes and shapes and come in both vented and sealed forms. A single NiCd cell has a voltage of 1.2V which is a bit less than the 1.5V from a typical alkaline battery. Individual cells are often connected in series in a battery to give a greater overall voltage.

#### 1. Decision Factors:

- o Disposal/recycling of batteries weighing more than 15 pounds will be managed through the DLA DS contract.

- Disposal/recycling of vented cell batteries will be managed through the DLA DS contract.
- Disposal of broken, damaged or leaking batteries will be managed through the DLA DS contract.
- Preparation of the batteries for shipment must comply with 49 CFR 172.102 (code/special provision 130) in that the battery terminals are protected from damage and short-circuiting. This is typically done by covering the terminals with non-conducting tape and packaging the batteries in a 1H2 drum.

2. Marking/Labeling and Shipping:

- See an example shipping label, enclosure 3.

b) **Nickel Metal Hydride Batteries** are a type of rechargeable battery similar to nickel cadmium, but the cadmium negative electrode is replaced with a metal alloy which absorbs hydrogen. They are made in many sizes and shapes and are currently the main battery type used in hybrid vehicles. A single NiMH cell has a voltage between 1.2 and 1.4V depending on the degree of charge depletion and current load. Recharging must be closely controlled due to a potential buildup of hydrogen gas once the battery reaches capacity. Individual cells are often connected in series in a battery to give a greater overall voltage.

1. Decision Factors:

- Disposal/recycling of batteries weighing more than 15 pounds will be managed through the DLA DS contract.
- Disposal of broken, damaged or leaking batteries will be managed through the DLA DS contract.
- Preparation of the batteries for shipment must comply with 49 CFR 172.102 (code/special provision 130) in that the battery terminals are protected from damage and short-circuiting. This is typically done by covering the terminals with non-conducting tape and packaging the batteries in a 1H2 drum. For small quantities pack in Call2Recycle cardboard box and ship via UPS.

2. Marking/Labeling and Shipping:

- See an example shipping label, enclosure 4.

c) **Lithium Ion Batteries** are related to primary lithium batteries except that the metal lithium electrode is replaced with an inert electrode which incorporates lithium. This allows the battery to be recharged. The chemical reaction yields a cell voltage of approximately 3.6V.

That voltage would separate the hydrogen and oxygen molecules in water. Lithium metal is highly reactive with water; consequently, the electrolyte in this type of battery is organic rather than aqueous. Of commercially available batteries, lithium ion batteries offer the best weight to energy ratio as well as other advantages. It is the least stable and most susceptible to adverse reaction when damaged. There are therefore additional control measures for shipping them.

1. Decision Factors:

- Disposal/recycling of batteries weighing more than 11 pounds will be managed through the DLA DS contract.
- Lithium and lithium ion batteries are to be separated. Lithium batteries are to be disposed of through the DLA DS contract.
- Disposal of broken, damaged or leaking batteries will be managed through the DLA DS contract. Note, damaged lithium and lithium ion batteries are highly dangerous and must be isolated following discovery of the damage.
- Batteries are shipped to Call2Recycle in cardboard boxes provided by them. Batteries are prepared for shipment in accordance with DOT-SP 14849.
- The terminals are protected from damage and short-circuiting by placing batteries individually in sealable plastic bags or taping the terminals with non-conductive tape.
- Packages must be protected from heat.
- The total weight of each package may not exceed 50 pounds.
- Package must be securely closed with tape prior to shipment.

2. Marking/Labeling and Shipping:

- See an example shipping label, enclosure 5.
- Add the lithium ion warning label to the outside of the box. Do not alter the label, because it meets specific letter size requirements for approved marking of this material.
- The outer package must additionally be marked "FORBIDDEN FOR TRANSPORT ABOARD AIRCRAFT AND VESSEL".

## 7.2 Preparation for Shipment

a) Mark each packaging with:

- Assigned Site #: see enclosure 1.
- Check the universal waste label: see enclosures 3 – 5.
- For boxes containing lithium ion batteries, ensure the label described by enclosure 2 is on the box.

- b) Secure containers to a pallet(s). If shrink wrap is used, ensure all markings are still visible from the outside

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## STANDARD OPERATING PROCEDURE

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**Subject:** Storm Water Management

**References** (a) Base specific Storm Water Pollution Prevention Plan (SWPPP)  
(b) OPNAVINST 5090.1B, Environmental and Natural Resources Program Manual  
(c) Code of Federal Regulations part 40

**Enclosures:** (1) CSW-007 (Hazardous Waste Label)  
(2) CSW-018 (Waste Acceptance Form)

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### 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel operating under contract ID # N62473-10-D-4009, with the guidelines for managing storm water.

### 2. BACKGROUND

Under contract N62473-10-D-4009, the Service Provider provides environmental support; operates Consolidation, Storage, and Transfer Hazardous Waste Facilities (HWF); and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area. The Service Provider operates two Part B permitted Hazardous Waste Facilities, and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements. The Service Provider will research, document, and recommend the most economical option available to provide disposal and recycling services.

### 3. SCOPE

This procedure defines the process for managing storm water.

### 4. ACTION

This document applies to Service Provider personnel who manage containerized waste for disposal and recycling.

### 5. DEFINITIONS

- a) **HWF** – (HWF) a consolidation, storage, and transfer facility for HW and HM.
- b) **Bilge Water** – Non hazardous liquid waste (petroleum oil, lubricant and water)
- c) **CSW** - Containerized Solid Waste
- d) **Hazardous Material** – (HM) is any material or substance, which even in normal use poses a risk to health, safety, or the environment.
- e) **Hazardous Waste** – (HW) any waste as defined in 40 CFR Part 261.3 and CCR Title 22 Part 66261.3.

- f) **Storm Water** – (Non hazardous) Rain water that is collected, is clear and bright, contains no dyes, and when swirled contains no evidence of contamination other than particulates.  
**Storm Water** – (hazardous) Rain water that contains evidence of contamination is collected and processed as non RCRA hazardous waste unless RCRA listed wastes F001 through F005 were recently consolidated/stored in the area.
- h) **Service Provider** – The company or entity operating HWF and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6. RESPONSIBILITIES

### 6.1 HWF Leader/Disposer

- a) Confirms location where storm water was collected from.
- b) Classifies storm water as either non hazardous or hazardous depending on location where storm water was collected and if it shows evidence of contamination (sheen).
- c) Containerizes storm water into drums and stores on pallet in designated area for processing/disposal.
- d) Marks/labels containers as either non hazardous or hazardous as appropriate.
- e) Schedules processing/disposal when sufficient volume or storage time dictates.

## 7. PROCEDURES

The following procedure shall be used to manage storm water on U.S. Naval Bases in San Diego in conjunction with the base specific SWPPP and associated Best Management Practices.

- a) Storm water collected at NBCNI by CSW personnel would have been collected from OS-2; the bermed area under the canopy or from the sump in the cage.
  - o Storm water collected from the bermed area could potentially be non RCRA or RCRA regulated dependent on recent activity.
  - o Storm water collected from the sump would most likely be non hazardous but must be evaluated before release.
- b) Storm water collected at NAB by CSW personnel would have been collected from the bermed area under the canopy.
  - o Storm water collected from the bermed area could potentially be non RCRA or RCRA regulated dependent on recent activity.
- c) Storm water collected at NBSD by CSW personnel would have been collected from the bermed area under the canopy or from a sump outside of the canopy.
  - o Storm water collected from the bermed area could potentially be non RCRA or RCRA regulated dependent on recent activity.
  - o Storm water collected from a sump would most likely be non hazardous but must be evaluated before release.
- d) Storm water collected at NBPL by CSW personnel would have been collected from the bermed area under the canopy or a sump outside of the canopy.

- o Storm water collected from the bermed area could potentially be non RCRA or RCRA regulated dependent on recent activity.
- o Storm water collected from a sump would most likely be non hazardous but must be evaluated before release.
- e) Mark/Label containers in accordance with this SOP.
- f) Schedule processing/disposal when sufficient volume or storage time dictates.
- g) Properly document transfer of containers with a Waste Acceptance Form or BOL/manifest as appropriate.

#### **7.1 Marking/Labeling**

If the storm water has no evidence of contamination do not containerize. If the storm water has evidence of contamination affix a complete HW label to the drum. Manage as non RCRA hazardous waste unless the contamination could have been caused by solvents recently stored/processed. RCRA listed waste codes F001 through F005 may apply.

#### **7.2 Transfer to IWOW**

A new Waste Acceptance Form (WAF) is generated for the material to be treated at the IWOW plant. The IWOW Chemist will review the WAF and visually inspect each container to be treated. Afterward, the HWF Supervisor and the IWOW Chemist will determine a date for the waste to be transferred to the IWOW plant for disposal.

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## STANDARD OPERATING PROCEDURE

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**Subject:** Acetylene Compressed Gas Cylinder Management

**References:**

- (a) Code of Federal Regulations, Title 40 Part 261.3, 262.31 and 262.32
- (b) California Code of Regulations, Title 22 Part 66261.3, 66262.31 and 262.32
- (c) Code of Federal Regulations, Title 49 Parts 171 – 180
- (d) Code of Federal Regulations, Title 29 “Labor” section 1910.101
- (e) National Fire Protection Association (NFPA) NFPA 55 Storage, Use and Handling of Compressed and Liquefied Gases in Portable Cylinders 1998
- (f) Compressed Gas Association, Inc., Pamphlet G-1: Acetylene, 1990

**Enclosures:** (1) CSW-095 Cylinders – What you need to know (PMSHA - PHH50-0078-0706)

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### 1. PURPOSE

This Standard Operating Procedure (SOP) provides guidelines for the management of acetylene compressed gas cylinders.

### 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (CST) facilities; and provides hazardous waste (HW) and hazardous material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste facilities, and two <90-day Hazardous Waste facilities with storage areas designed specifically for the storage and management of Hazardous Waste. Employees of the Service Provider have been trained in the identification and safe handling of hazardous waste and hazardous materials. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

Acetylene compressed gas cylinders can be very dangerous if handled by untrained or unqualified individuals. Every cylinder has multiple hazards; they range from the physical to chemical.

#### Physical

- Excessive cylinder pressures can cause bulging or busting of the vessel.
- Dropping can cause shearing of the valve which may result in a projectile due to immediate pressure release.
- Acetylene compressed gas cylinders come in a wide range of shapes, sizes and materials of construction.
- Caution must be used when handling the cylinders to guard against dropping or permitting containers to strike against each other, other surfaces or individuals.

### Chemical

- Acetylene is a petroleum gas.
- All petroleum gases are flammable.
- Flammable gases ignite easily and burn in air.
- The flame and heat propagation rate can be so great as to resemble an explosive.

Acetylene compressed gas cylinders contain flammable gas, they are also under pressure, can be awkward to move and potentially explosive if mishandled or subjected to abnormal storage conditions and may contain asbestos and acetone. The asbestos was used as a porous filler media.

### 3. SCOPE

This SOP has been developed to outline the proper steps a trained employee must follow in evaluating, handling, transporting and storing acetylene compressed gas cylinders for disposal and/or reclamation.

### 4. ACTION

This document applies to all Service Provider personnel who evaluate, handle, transport and store acetylene compressed gas cylinders for disposal and/or reclamation.

### 5. DEFINITIONS

- a) **HWF** - Hazardous Waste Facility: a consolidation, storage, and transfer facility for HW and HM.
- b) **CST** – Consolidation, Storage & Transfer facility
- c) **CSW** - Containerized Solid Waste
- d) **HW** – Any waste as defined in 40 CFR Part 261.3 and Title 22 CCR Part 22261.3
- e) **HM** – Any material or substance, which even in normal use, poses a risk to health, safety or the environment.
- f) **Cylinder** – A pressure vessel designed for pressures higher than 40 psia (pounds per square inch absolute) and having a circular cross section. It does not include a portable tank, multi-unit tank car tank, cargo tank or tank car.
- g) **Markings** – Manufacturing marks such as the cylinder thread type, the country of manufacture, and the serial number assigned by the manufacturer, operational marks such as the test pressure, the tare or empty weight, and the minimum wall thickness, certification marks such as the UN packaging symbol, the ISO standard, the country or countries of approval and the manufacturer's approval mark. Hazardous waste markings may also be appropriate.

- h) **Service Provider** – The company or entity operating hazardous waste facilities and providing Containerized Solid Waste (CSW) management services to the Navy under contract N62473-10-D-4009.

## 6. RESPONSIBILITIES

### 6.1 CSW Manager (CM)

- a) Ensures the SOP conforms to applicable regulatory requirements and policies
- b) Ensures the guidelines promote safe and efficient work practices.
- c) Ensures employees conduction work covered by the SOP have been adequately trained.
- d) Periodically reviews the SOP and makes modifications as appropriate.

### 6.2 CSW Compliance/QC Manager

- a) Validates or drafts SOP.
- b) Signs SOP for final approval.
- c) Makes copy of original signed SOP.
- d) Files original signed SOP into Master SOP files.
- e) Makes copies and distributes to Supervisors.
- f) Documents SOP training in employee Training File.

### 6.3 HWF Supervisor (Supervisor)

- a) Trains employees conducting work covered by the SOP.
- b) Ensures the work is performed in accordance with the SOP as applicable.
- c) Reports instances of non-conformance to the CM and takes corrective action as necessary.
- d) Recommends changes to maintain regulatory compliance and promote safe and efficient work practices.
- e) Ensures 90-day accumulation time limit is not exceeded.
- f) Ensures waste is tracked and records maintained.

### 6.4 HWF Leader/Disposer (Leader/Disposer)

- a) Understands and complies with guidelines described in this SOP.
- b) Performs all work in a safe manner.
- c) Reports instances of non-conformance to the Supervisor, Compliance Manager or CM.
- d) Recommends changes which maintain regulatory compliance and promote safe and efficient work practices.
- e) Has successfully completed the service provider's cylinder evaluation & shipping protocol manual training or equivalent, prior to handling cylinders.

## 7.0 PROCEDURES

The following procedures shall be used to manage acetylene compressed gas cylinders.

### 7.1 Evaluate cylinder

Evaluate the cylinder prior to transport. Begin with a visual inspection:

- a) Contents labeled
- b) Verification of contents
- c) Pressure relief devices
  - o If relief indicator is protruding **DO NOT SHIP!**
- d) Condition of valve
  - o **MUST** be working (**DO NOT OPEN TO CHECK!**)
  - o Evaluate for corrosion, leaks and disfigurement.
  - o Check for oil, grease or other foreign matter on or near valve.
- e) Denting
  - o The denting of cylinders may cause weakening of the walls sufficient to make the cylinder non-transportable.
  - o If the dent is deeper than 1/10<sup>th</sup> the greatest dimension of that dent, the cylinder may be considered non-transportable. See example below.
  - o Dents can be measured with accurate measuring tools such as a tape measure or ruler.
  - o Dent depth may not exceed 10% dent length

**Example: If the dent depth A = 1.75" and the dent length B = 10"**

**$B \times 0.1 = 10 \times 0.1 = 1" \text{ max} - \text{Cylinder is non-transportable}$**

- f) Corrosion
  - o The corrosion of the cylinder body may weaken the cylinder enough to render it non-transportable.
  - o Deep "pits" in corrosion areas are spots which may weaken the cylinder wall enough to cause accidental release of gas.
  - o Pits can be measured with accurate measuring tools such as a tape measure or ruler.
  - o When general corrosion surrounds an area with a deeper pit(s), the maximum pit depth should not be greater than .042 of an inch.
  - o When isolated pits are found not surrounding an area of corrosion, the pit depth should be no greater than .084 of an inch.
- g) Bulging
  - o When a bulge in a cylinder is observed and the cause of such defect appears to be caused by heat/fire, the cylinder shall be deemed non-transportable if the paint/coating of the cylinder wall is burnt or cracked off indicating the metal compromising the cylinder has been heated to an extent by a source of heat.

- In cases where over filling or defect bulges occur the cylinder may be considered non-transportable if the bulge defect is greater than 1% of the normal cylinder measurements.

**Example: If the cylinder bulge circumference A = 37.5" and the normal cylinder circumference B = 35**

$$35 + 35 (.01) = 35.35$$

**Since A = 37.5 the cylinder is non-transportable**

h) Leaking

- When first inspected, if a cylinder is or appears to be leaking, notify the generator immediately and leave the area.
- If no denting, bulging or corrosion conditions exist, a leak test should be performed.
- To leak test for minute leaks, use Snoop © liquid test solution to check the packing nut, the valve handle insert, the pressure relief device, the valve outlet area around seams and welds and the pressure relief device at the bottom of the cylinder if applicable.
- **NEVER** use a flame to locate gas leaks.

i) Attached apparatus or devices must be removed

- The cylinder valve outlet **MUST** be free from all apparatus and plug-type devices.
- The generator should remove the attached apparatus or device.

## 7.2 Handling cylinder

The DOT requires that a cylinder be condemned when it leaks, or when corrosion, denting, bulging or evidence of rough usage exists to the extent that the cylinder is likely to be weakened appreciably. If these deformities exist on a cylinder, it is not legally transportable and it should not be moved.

- Cylinder valves must be closed before moving using spark proof tools.
- Valve protection should be in place before moving.
- Cylinders shall be moved using suitable hand trucks to which they are securely fastened.
- **DO NOT USE** valve protection devices to manually lift cylinders.
- For short distances, cylinders may be moved by tilting and rolling them on their bottom edges

## 7.3 Transport cylinder

a) Valve protection

- If a cylinder has threading around the collar, or was originally fitted with a protective valve cap it must be present to ship.

b) Securing in Truck

- Upright to the sidewall of the truck
  - Use 2 ratchet straps
  - Hooks for the straps should be affixed at approximately 18" x 48" from floor
  - Multiple straps shall be utilized to prevent any one strap from securing more than 3 consecutive cylinders.
- c) Segregation
- Properly packaged and secured cylinders should be transported according to the segregation table found in 49 CFR 177.848.
- d) Manifesting
- Cylinders are their own DOT UN container (CY) and must be manifested as such even if cylinders are overpacked.
  - UN 1001, Acetylene, dissolved, 2.1
  - Profile CG11 - RCRA D001 – CA 331
- e) Paperwork and Labels
- Each acetylene cylinder shall be marked with the hazardous waste marking label, "Contains Asbestos" marking label if manufactured pre-1990 and a DOT Flammable Gas label.
  - Wire ties can be used to secure the DOT label

#### 7.4 Store cylinder

Cylinders of compressed gas shall be stored upright in well ventilated areas away from flames, sparks or any source of heat (includes direct sunlight) or ignition and must be stored away from electrical outlets so as not become part of a circuit. They should be stored in assigned places such as a compressed gas cylinder cage. Cylinders stored out-of-doors, should be protected from the ground to prevent corrosion and if constructed using asbestos, store in our <90-day storage facilities.

The cylinders shall be secured to the cage using straps, chains or other suitable method. Valve covers must be attached if equipped for covers and must be stored at least 20' from oxygen cylinders.

#### 7.5 Disposal

Acetylene compressed gas cylinders manufactured in the eighties may contain asbestos as a porous filler and acetone. Most cylinder recyclers are not permitted to manage these types of cylinders. For our purposes, if an acetylene cylinder was manufactured pre-1990, assume it was constructed using asbestos; post 1990 assume it was NOT constructed using asbestos. Mark, label and store accordingly.

Under other circumstance, it would be necessary to contact the cylinder manufacturer with the cylinder information, date markings etc. for them to be able to determine if asbestos was used in that cylinder's construction.

If the container is manufactured by Norris Cylinder (manufacturer's code is a D inside a diamond shape) and post-dated 1988, you can be certain that the filler does not contain asbestos. If dated 1988 or pre 1988, you must contact them as well to make the determination.

Acetylene compressed gas cylinders with asbestos must be managed separately from those cylinders without asbestos in their construction. A local compressed gas cylinder handler can re-test and re-fill non-asbestos type cylinders but those with asbestos in their construction need to be managed as hazardous waste and must be shipped to a permitted TSDf for disposal.

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# STANDARD OPERATING PROCEDURE

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**Subject:** Retention of Waste Management Documents

**References:**

- (a) SECNAVINST 5090.8A.5.h Policy for Environmental Protection Natural Resources and Cultural Resources Programs
- (b) SECNAV M-5210.1 Records Management Program
- (c) OPNAVINST 5090.1D Environmental Readiness Program Manual
- (d) CCR 66262.56 & 57 Annual Export Report
- (e) CCR 66264.15(b)(2) Schedule of Inspections
- (f) CCR 66264.15(d) Inspection Log or Summary
- (g) CCR 66264.16(e) Training Records
- (h) CCR 66264.73 Operating Records
- (i) 49 CFR 172.201(e) DOT Shipping Papers
- (j) NASNI DTSC Permit 97-SC-002
- (k) NBSD DTSC Permit 06-GLN-11

**Attachment:** Records Retention Spreadsheet

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## 1. PURPOSE

This Standard Operating Procedure (SOP) was developed to provide Service Provider personnel with instructions for record retention.

## 2. BACKGROUND

The Service Provider provides environmental support; operates Consolidation, Storage, and Transfer (HWF) facilities; and provides Hazardous Waste (HW) and Hazardous Material (HM) collection and disposal services to all Navy and Marine Corps Installations in the San Diego area under contract N62473-10-D-4009. The Service Provider operates two Part B permitted Hazardous Waste Facilities (HWF), and two 90-day Hazardous Waste Facilities with storage areas designed specifically for the storage and management of HW. Employees of the Service Provider have been trained in the identification and safe handling of HW and HM. The services provided include waste characterization, consolidation, storage, spill clean-up and disposal arrangements.

## 3. SCOPE

This procedure defines the guidance for HWF personnel with regard to management of records created in the course of work.

## 4. ACTION

This procedure applies to HWF personnel receiving, shipping and otherwise performing work defined under contract N62473-10-D-4009.

## 5. DEFINITIONS

Bill of Lading (BOL) – A document issued by a shipper to a carrier, acknowledging that specified goods have been received on board as cargo for conveyance to a named place for delivery to the consignee.

Defense Logistical Agency (DLA) – A Department of Defense organization responsible for maximizing the use of items by inter-federal agency transfers, donations to state and local governments, or disposal of excess property received from the military services.

Delivery Order Folder – The delivery order folder contains documents pertaining to a shipment of waste from a CNRSW CSW facility to a TSDF or recycling facility. It includes documents required to track drums from inventory to final disposal including information used to characterize the waste.

DTSC – Department of Toxic Substance Control is the department within the State of California which enforces EPA RCRA regulations.

Environmental Management System (EMS) - part of the overall management system that enables an organization to control its environmental aspects, reduce environmental impacts and increase operating efficiency.

Land Disposal Restriction Form (LDR), also known as Land Ban Form – a form that ensures land disposed hazardous waste does not pose a threat to human health and the environment. EPA accomplishes this by setting treatment standards for all hazardous waste bound for land disposal. These treatment standards ensure hazardous waste is properly treated to destroy or immobilize hazardous chemical components before it is land disposed.

NAB – Naval Amphibious Base

NBC NI – Naval Base Coronado North Island

NBPL – Naval Base Point Loma

NBSD – Naval Base San Diego

Quality Control Check (QC Check) – Is an independent check of material and/or document preparation and or disposition.

Record Storage Facility – The Hazardous Waste Treatment Complex on Naval Base Coronado North Island holds records for waste management activities from the San Diego Metro Area. Records may be stored in buildings 788, 1606, 803 and the records locker adjacent to building 1606.

Until Closure Complete (UCC) – The DTSC Permit specifies this requirement.

Uniform Hazardous Waste Manifest (UHWWM) – A system of forms, reports, and procedures designed to seamlessly track hazardous waste from the time it leaves the generator facility where it was produced, until it reaches the off-site waste management facility that will store, treat, or dispose of the hazardous waste. The system allows the waste generator to verify that its waste has been properly delivered, and that no waste has been lost or unaccounted for in the process.

Waste Shipping Document – A document that accompanies a waste shipment that is used to properly describe and manage the pickup, transport, treatment, storage, and disposal of a waste. Documents include, but are not limited to: UHWWMs, BOLs, Weight Tickets, LDRs, and DD-1348-1A's.

Waste Shipping Record – A completed and executed hazardous waste shipping document that accompanied a hazardous waste shipment. Hazardous Waste Shipping Records include, but are not limited to: Completed UHWMs, BOLs, Weight Tickets, LDRs, and DD-1348-1A's. Shipping records also include electronic forms and methods of recordkeeping.

## 6. RESPONSIBILITIES

### 6.1 HWF Supervisor (Supervisor)

- a) Responsible for overall compliance of the HWF with this SOP at their site.
- b) Reviews, edits, and approves all completed manifests and sends copies to NBC NI
- c) Creates and maintains waste inventory, characterization and outbound disposition records.
- d) Reports any non-compliance with this SOP to the CSW Manager.

### 6.2 HWF Leader/ Disposer (Leader/Disposer)

- a) Understands and complies with the procedures established in this instruction.
- b) Reports observed and perceived non-compliance with this instruction to the Supervisor.

### 6.3 Administrative Clerk

- a) Organizes and maintains waste shipping record files
- b) Completes updates and maintenance to the EMS Database.
- c) Tracks waste shipments and advises management of overdue records and receipts.
- d) Conducts records inventory and gathers obsolete or overdue records for disposition.

### 6.4 CSW Manager (Program Manager)

- a) Documents any discovered manifest deficiencies.
- b) Approves the disposition of obsolete or outdated records
- c) Periodically reviews EMS compliance.

### 6.5.1 Compliance Manager

- a) Provides technical support and guidance.
- b) Reviews outside contractor manifests prior to shipment.
- c) Reviews completed manifest prior to distribution to DTSC.

## 7.0 PROCEDURES

### 7.1 File Management for Waste Shipping Records

There are many recordkeeping requirements applicable to generators, transporters, and TSDFs. The accurate inventory and organization of documents and record files are critical for monitoring the proper management of wastes. Accurately preparing shipping documents and maintaining the corresponding records, ensures the "cradle to grave" concept for waste management. Hazardous waste shipping records shall be identified, stored, protected, and maintained as follows:

- Each CSW Location (NAB, NBSD and NBPL) will maintain a copy of all waste shipping records to and/or from their location for a minimum of three years. After three years, these records may be stored at the Records Storage Facility at NBC NI.
- At the NBC NI Record Storage Facility, each CNRSW designated installation shall have a separate hard copy folder.
- Hard copies of documents from other installations which ship to a CNRSW TSDF are similarly maintained in a miscellaneous folder.
- Within each folder, records are sorted by shipping date.

## 7.2 Electronic File & Database Management for Hazardous Waste Shipping Records

The Electronic Hazardous Waste File and Database is used as an aid in tracking and managing waste shipments and the corresponding records. The Administrative Clerk shall maintain and update the database and enter information as follows:

- Input the date the manifest was signed.
- Track that all manifests have returned receipts with 35 days of shipment.
- It is the responsibility of the clerk to verify that return manifests are tracked daily.
- On the 30<sup>th</sup> day the clerk shall make contact with DLA to determine the status of the any unreturned manifests and notify CSW or Compliance Manager by email.
- Any records documenting actions to track returned manifests shall be placed on top of the associated manifest.
- The CSW Manager is to be notified on the 40<sup>th</sup> day that the return manifest is not received and an Exception Report will be filed on day 45.

## 7.4 Documents and Records for Individual Drums

Documents including SDS or analytical reports relating to a drum or number of drums are:

- Maintained in a document pouch with the drums while in storage.
- Included with the DD1348-1A and disposal serial log in the delivery order folder.
- Delivery order folders are stored on site for three years.
- After three years they may be transferred to the NBC NI Record Storage Facility.

## 7.5 General Waste Shipping Record Rules

All waste records shall be managed in accordance with HW-05-006 Hazardous Waste Manifesting and HW-05-004 Disposal of Containerized Waste as well as specific rules as follows:

- All Hazardous Waste records shall be retained per Table 1 of this SOP.
- Waste Shipping Records shall be safely stored in file cabinets or boxes.
- Waste Shipping Records under (3) years old will be maintained at the generating installation and NBC NI Record Storage Facility.
- Waste records shall list the calendar year and the general contents of each box.

## 7.6 Other Hazardous Waste Records

Other hazardous waste records are the responsibility of the Hazardous Waste Supervisor. These include:

- Waste Turn-in Forms
- Inventory Tracking Binder
- Daily, Weekly and Monthly Facility Inspection forms.
- Personnel training documents and records will be maintained by the Compliance Manager.
- Waste Analysis Plan, profile database and Land Disposal Restriction records maintained by the Profile Specialist.

