

Environmental Standard Operating Procedure			
Originating Office: MCAS Miramar Environmental Management Department	Revision: Original	Prepared By: Waste Management Department	Approved By: William Moog
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Title: Hazardous Waste Satellite Accumulation Area (Greater than 90 Day Site)

1.0 PURPOSE

The purpose of this Standard Operating Procedure is to provide environmental guidelines for the management of Hazardous Waste Satellite Accumulation Areas (Greater than 90 Day Sites).

2.0 APPLICATION

This guidance applies to those individuals working with Hazardous Waste Satellite Accumulation Areas (Greater than 90 Day Sites) aboard MCAS Miramar.

3.0 REFERENCES

- 40 CFR 262.34(c): Satellite accumulation requirements.
- 40 CFR 265.171: Container condition.
- 40 CFR 265.172: Waste and container compatibility.
- 40 CFR 265.173: Container management.
- 22 CCR 666262.34(e): Waste accumulation limits.
- 22 CCR 66265.171: Container condition
- 22 CCR 66265.172: Waste and container compatibility.
- 22 CCR 66265.173: Container management.
- MCAS Miramar Hazardous Waste Management Plan

4.0 PROCEDURE

4.1 Discussion:

The Hazardous Waste Satellite Accumulation Site (SAA) is operated by each tenant Command aboard MCAS Miramar which in turn designates a Hazardous Waste Coordinator (HWC) to manage the site. The HWC is responsible for receiving Hazardous Waste (HW) from the different shops within the Unit. The Hazardous Waste Coordinator will be responsible for the SAA and collection containers, in accordance with all applicable HW regulations including proper containerization, labeling, documentation, and adherence to satellite accumulation storage limit. The MCAS Miramar Hazardous Waste Management Plan must be use as a reference when question

arise on how to manage the satellite accumulation sites.

4.2 Operational Controls:

For operational control and procedures, refer to MCAS Miramar Hazardous Waste Management Plan section 3; another source will be the Resource Conservation and Recovery Act (RCRA) that cover many of the concerns about the dangers of improper storage of Hazardous Waste.

4.3 Documentation and Record Keeping:

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

4.4 Training:

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

4.5 Emergency Preparedness and Response Procedures:

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

4.6 Satellite Accumulation Area (SAA) Requirements:

Hazardous waste (HW) can be accumulated at or near the point of generation, under the direct control of the operator. MCAS Miramar policy is that HW may be accumulated in the SAA for a time period that will not exceed 9 months. State regulation does allow one year; however, this has been reduced by base policy to provide adequate time for processing the waste for turn-in.

Waste accumulated in a SAA may not exceed 55-gallons per waste stream.

Once the quantity of HW in the SAA reaches 55 gallons or the 9-month time limit is reached, the

container must be moved to a less than 90 day site within 72 hours (including weekends and holidays). In addition, HW in SAAs may not be accumulated on site beyond one year (including the 90-day LQG accumulation limit).

4.7 Container Management:

All containers storing HW in the SAA must also meet the requirements as per the HWMP and the Department of Transportation.

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

Inspection Items	Yes	No	Comments
1. Is the hazardous waste satellite accumulation site limited to 55 gallons of hazardous waste, one quart of acutely hazardous waste, or one quart of extremely hazardous waste per waste stream? <i>(22 CCR 66262.34(e)(1))</i>			
2. Is the hazardous waste accumulated in a container and at or near the area where the waste is generated and under the control of the operator of the process generating the waste? <i>(22 CCR 66262.34(e)(1)(A))</i>			
3. Is the container holding the hazardous waste in good condition? <i>(22 CCR 66265.171)</i>			
3. Are the containers compatible with the waste inside the container? <i>(CCR 66265.172)</i>			
4. Are the containers kept closed except when waste is being added or removed? <i>(CCR 66265.173(a))</i>			
5. Are the containers opened, handled, transferred, or stored in a manner that will prevent the container from rupturing or leaking? <i>(CCR 66265.173(b))</i>			
6. Is the waste accumulation time frame limited to nine months from the ASD or when the container is full, whichever occurs first? <i>(HWMP Sec:3.2.3(D) 22 CCR 66262.34(e)(1)(B))</i>			

7. Is the container marked with the initial date of waste accumulation and visible for inspection? (22 CCR 66262.34(e)(1)(C))			
8. Is the waste moved to the 60-day site within 3 day of the container fill date? (CCR 66262.34(e)(3))			
9. Is satellite area authorized by Waste Management Division and identified in Unit's Business Plan?			

ADDITIONAL COMMENTS:

CORRECTIVE ACTION TAKEN:

Environmental Compliance Coordinator

Name: _____

Signature: _____

Date: _____