

Environmental Standard Operating Procedure			
Originating Office: <b>MCAS Miramar Environmental Management Department</b>	Revision: Original	Prepared By: Environmental Management Department	Approved By: William Moog
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## Title: Scrap Processing

### 1.0 PURPOSE

The purpose of this Environmental Standard Operating Procedure (ESOP) is to provide environmental guidelines for performing scrap processing activities.

### 2.0 APPLICATION

This guidance applies to those individuals who perform scrap processing activities onboard Marine Corps Air Station (MCAS) Miramar.

### 3.0 REFERENCES

- 40 CFR 262 (Code of Federal Regulations)
- 29 CFR 1910
- 22 CCR (California Code of Regulations)
- California Health and Safety Code 25215-25215.5
- MCO P5090.2A (USMC Environmental Compliance and Protection Manual)
- MCO P5100.8
- MCO P4790.2C
- Station Order 6281A
- SDAPCD Rule 67 (San Diego Air Pollution Control District)
- San Diego County Business Plan: Emergency Response Plan
- NPDES General Permit CAS000001 Section A (10)(a) (National Pollutant Discharge Elimination System)

### 4.0 PROCEDURE

#### 4.1 Discussion:

Scrap processing operations are responsible for the collection of cardboard, paper, glass, plastic and aluminum from base facilities, and includes the bailing of cardboard, paper and aluminum for recycling. Vehicles and forklifts used for scrap processing operations use petroleum, oil, and lubricants (POL) and batteries, generates

minor amounts of household hazardous wastes (HW), and residual amounts of waste paint in empty spray paint cans. These materials must be managed properly to avoid impacts to human health and the environment. The Environmental Management Department (EMD) inspects the manifests of these contractors to ensure proper handling of these wastes.

#### **4.2 Operational Controls:**

The following procedures apply:

1. Ensure that Material Safety Data Sheets (MSDS) for POL, degreasers, paints, cleaning products and all materials associated with this practice are available and current.
2. Ensure that operation manual (e.g. shredder, bailer, etc.), model number, brake horsepower rating, and supplier fuel certification for each piece of equipment (e.g., forklift, bailer, etc.) is available and is in a designated location known to all shop personnel.
3. Ensure that training records and certifications are current and available for inspection.
4. Wear appropriate protective personal equipment (PPE) such as eye protection, face shields, cranials, rubber gloves, aprons, steel toe boots, respirators (half face air purifying), hard hats, coveralls, hearing protection.
5. Keep fire extinguishers readily accessible and near potential hazardous areas.
6. Ensure that all required permits are current and available for inspection (e.g. health permit, etc.).
7. Use each piece of equipment in the recycling yard only for its intended purpose.
8. Conduct periodic maintenance of equipment as recommended by the manufacturer.
9. Ensure maintenance records are current and available for inspection including maintenance request forms and invoices.
10. Store all usable hazardous materials such as oil, grease, and cleaning products, in the hazardous materials (HAZMAT) locker.
11. Properly label all containers completely and legibly with the following information: "Hazardous Waste" on outside of container, accumulation start date, and Environmental Protection Agency (EPA) HW number (e.g. D003).
12. Ensure that used fluids are not cross-contaminated with any other fluids or materials. This includes using dedicated transfer containers for each waste stream.
13. Keep storage and transfer containers closed except when HW is being added or removed.
14. Ensure containers, drums, or ASTs with ignitable waste in the satellite accumulation area (SAA) are grounded during waste accumulation.
15. Ensure drums and ASTs are not overfilled. Drums and ASTs are considered full when 3 to 4 inches of

head space remain to allow for thermal expansion.

16. Contact the Hazardous Waste Minimization (HAZMIN) center when drums are full for transfer to the 90 day storage area.
17. Maintain a HW log with current information on container types, accumulation start and end dates, dates the containers were taken to the 90 day storage area manifest number, etc.
18. Ensure that containers or inner liners larger than five gallons that previously held HW are properly marked with the word "Empty" and the date it was emptied.
19. Ensure that warning signs are clearly visible and legible from a distance of 25 feet in any direction.
20. Ensure that facility inspections are documented and that inspection records are maintained and available for inspection.
21. If there are any specific situations or other concerns not addressed by this procedure, contact the Environmental Management Department.

#### **4.3 Documentation and Record Keeping:**

The following records must be maintained for this practice:

1. MSDSs for all materials associated with this practice.
2. Training records and certifications.
3. Operation manuals, model number, brake horsepower rating, and supplier fuel certification.
4. Hazardous materials inventory (must match Authorized Usage List).
5. HW transfer actions to HAZMIN center (contractor "turn in" receipts)
6. Spill log book.
7. Scheduled maintenance record (request forms and bills).
8. Required permits (e.g., health permit).

#### **4.4 Training:**

All applicable personnel must be trained in this ESOP. This includes, but is not limited to, the following:

1. Hazard Communication (HazCom) training.

2. First Responder Awareness (FRA) training.
3. Station Order 6281A training.
4. Preventative Maintenance.
5. On-the-job training.

**4.5 Emergency Preparedness and Response Procedures:**

Refer to Marine Corps Order (MCO) P5090.2A, Subject: Oil/Hazardous Substance Spills (OHSS) and Spill Prevention Containment & Countermeasures (SPCC) for MCAS Miramar.

Also refer to the San Diego County Business Plan: Emergency Response Plan.

**4.6 Inspection and Corrective Action:**

The Environmental Protection Specialist (EPS) from the EMD performs inspections. The EPS shall ensure deficiencies noted during the inspections are corrected immediately. Actions taken to correct each deficiency shall be recorded on the inspection sheet.

Scrap Processing – Inspection Checklist	
Date:	Time:
Installation:	Work Center:
Inspector's Name:	Signature:

Inspection Items	Yes	No	Comments
1. Are MSDSs for shredder oil, degreasers, cleaning products and all materials associated with this practice available and current? <i>(29 CFR 1910)</i>			
2. Is an operation manual for each machine (e.g. shredder, bailer, etc.) available and in a designated location known to all shop personnel? <i>(29 CFR 1910, MCO P5090.2A)</i>			
3. Are training certifications current and available for inspection? <i>(MCO P5090.2A)</i>			
4. Is applicable PPE worn when appropriate? <i>(29 CFR 1910, MCO P5090.2A)</i>			
5. Are fire extinguishers readily accessible and near potential			

hazardous areas? <i>(29 CFR 1910, MCO P5090.2A)</i>			
6. Are all required permits current and available for inspection (e.g. health permit, etc.)? <i>(MCO P5090.2A)</i>			
7. Is each type of equipment in the recycling yard used only for its intended purpose? <i>(29 CFR 1910, MCO P5090.2A)</i>			
8. Is periodic maintenance of machines conducted as recommended by the manufacturer? <i>(MCO P5090.2A)</i>			
9. Are maintenance records and request forms maintained and available for inspection for three years? <i>(MCO P5090.2A)</i>			
10. Are all usable hazardous materials (oil, grease, cleaning products, etc.) stored in the HAZMAT locker? <i>(40 CFR 262, MCO P5090.2A)</i>			
11. Are all containers properly labeled completely and legibly with the following information: "Hazardous Waste," label with accumulation start date, and EPA HW number (e.g. D003)? <i>(40 CFR 262, MCO P5090.2A)</i>			
12. Are storage and transfer containers kept closed except when HW is being added or removed? <i>(40 CFR 262, MCO P5090.2A)</i>			
13. Are containers, drums, or ASTs with ignitable waste in the satellite accumulation area grounded during waste accumulation? <i>(29 CFR 1910, MCO P5090.2A)</i>			
14. Are drums and ASTs monitored to avoid overfilling? <i>(40 CFR 262, 29 CFR 1910, MCO P5090.2A)</i>			
15. Is the HAZMIN center contacted when drums are full? <i>(40 CFR 262, MCO P5090.2A)</i>			
16. Is a HW log maintained with current information on container type, accumulation start and end date, date the container was taken to the 90 day storage area, HW manifest number, etc.? <i>(40 CFR 262, MCO P5090.2A)</i>			
17. Are containers or inner liners larger than five gallons that previously held HW properly marked with the word "Empty" and the date it was emptied? <i>(40 CFR 262, MCO P5090.2A)</i>			
18. Are warning signs clearly visible and legible from a distance of 25 feet in any direction? <i>(29 CFR 1910, MCO P5090.2A)</i>			
19. Are all inspection records maintained and available for examination for three years? <i>(29 CFR 1910, MCO P5090.2A)</i>			

**ADDITIONAL COMMENTS:**

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**CORRECTIVE ACTION TAKEN:**

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**Environmental Compliance Coordinator**

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

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

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