

Environmental Standing Operating Procedure (ESOP)

TITLE:	MANAGEMENT OF POLLUTION ABATEMENT FACILITIES
RELATED BO:	5090.91
PURPOSE:	This SOP establishes the procedures for the management of pollution abatement facilities. Pollution abatement facilities consist of oil-water separators (OWS) and their associated influent sources. These facilities must be routinely monitored to ensure proper operation & usage. These requirements are established to ensure that compliance with National Pollutant Discharge Elimination System (NPDES). Ensure this SOP is placed in the unit's environmental SOP.
APPLICABILITY:	<p>Pollution Abatement facilities primarily collect rinsate (run-off) from vehicle washracks, and some maintenance garage floor drains, and fuel unloading areas. There are more than 100 of these facilities located aboard MCBCL/MCASNR. Without proper oversight, these systems may malfunction & discharge oil to the Base's wastewater treatment plant or to a stormwater drainage system. It is imperative that operating personnel or persons having cognizance over the facility's usage implement the procedures provided in this SOP to comply with environmental regulatory requirements.</p> <p>This section applies to all organizations organic to or tenanted aboard MCB, Camp Lejeune, MCAS, New River and those in transit or otherwise temporarily resident because of training or mobilization.</p> <p>Garrison operations at MCASNR will coordinate with the Environmental Affairs Division (EAD) 449-5997, MCASNR. Servicing of OWS systems at MCASNR will be coordinated through EAD, MCASNR.</p>
RESPONSIBILITY:	All units with pollution abatement facilities associated with their unit operations.
PROCEDURE:	<p>1. <u>PROHIBITED ACTIVITIES.</u></p> <p>1a. The Direct Disposal of Oils, Fuels, Hazardous Materials or Hazardous Waste into the pollution abatement facility is STRICTLY PROHIBITED.</p> <p>1b. No cans, sticks, leaves, oil filters, rags, brushes, litter or other foreign objects may be discarded on or into the pollution abatement facility.</p> <p>1c. Do not use or discard solvents on washracks or in floor drains. Floor drains are designed for incidental spills & leaks & are not intended for direct discharges of wastes. Cleaning agents & detergents used on washracks must be approved and listed on the Authorized Use List (AUL).</p> <p>1d. Vehicle washing is not authorized for fleet vehicles or other car washing operations, unless it is conducted on an approved wash rack, which is tied to an oil water separator system. Vehicle washing is only authorized for single, privately owned vehicles with no more than one being washed. Tactical vehicles may only be washed on approved unit owned OWS.</p>

	<p>2. Training.</p> <p>2a. Unit commanders shall ensure that personnel, who perform operations such as vehicle maintenance, fueling, or washing, are properly trained in the operation & maintenance of pollution abatement facilities. Personnel shall be trained on the environmental impact of oil & hazardous material spills, as well as the prevention of such incidents.</p> <p>2b. This training can be accomplished by attending EM101,EM107 or EM108 classes or by shop level training by the unit Environmental Compliance Officer (ECO) or command Environmental Compliance Coordinator (ECC), utilizing the "Management of Pollution Abatement Facilities" training module located on the EMD website.</p> <p>2c. Training should be documented in the individuals' training record (example record is located on the EMD website).</p>
	<p>3. Daily Inspections. The unit ECO, Assistant ECO (AECO) or assigned personnel operating the facility are responsible for inspecting the unit's pollution abatement facilities each operational day.</p> <p>3a. Documentation of the inspections must be maintained utilizing the attached "Monitoring Log for Oil Pollution Abatement Facilities." The log can also be downloaded from the EMD website.</p> <p>3b. The inspection process includes checks for the following:</p> <ol style="list-style-type: none"> (1) cracks or other structural damage; (2) oil spills around the facility; (3) direct discharge of oil/Used Oil/Used Fuel and/or fuel; (4) foreign objects/debris (cans, bottles, sticks, rags, etc) (5) system clogging or OWS bypass; and (6) post-indicator valves (PIV) are closed and locked. <p>4. Daily Maintenance/Housekeeping. The importance of daily maintenance at these facilities cannot be overly stressed. The efficiency of the facility will be greatly reduced if not given the proper attention. Any sound maintenance program should start with good housekeeping. The components of facility housekeeping are:</p> <p>4a. <u>Policing.</u> Ensure that all grass adjacent to the facility is cut & that trash & other debris are removed on a regular basis. Remove any foreign objects/debris observed in the pollution abatement facility by using a dip net. <u>Under no circumstances are personnel allowed to enter the OWS or other system components in order to retrieve debris.</u> Mechanical maintenance on pollution abatement facilities is prohibited at the unit level. Contact Lejeune Support Services for assistance with mechanical maintenance. These systems qualify as permitted confined spaces and require special training and equipment to enter. If a problem arises with the system, Call EMD at extension 451-1482. Any problems should be annotated on the required daily inspection log included with this order as Attachment (1).</p> <p>4b. <u>Vehicle Management.</u> Whenever possible, vehicles should be parked on an impervious surface (i.e. concrete or asphalt) to avoid the discharge of hazardous materials into the environment. Maintenance operations should always be conducted on impervious surfaces. Prior to using the wash apron, excess grit should be removed, prior to vehicle washing.</p>

4c. Wash Aprons. Concrete wash aprons should be washed and hosed down daily in order to keep the aprons neat and orderly. Only correctly sized water hoses may be utilized on the washracks; only AUL-listed detergents may be utilized for washing. Any spills that occurred must be cleaned up using an absorbent prior to hosing down. Ensure that any wash water is directed to the OWS.

4d. Grit Chambers. Grit chambers are designed to collect runoff from wash aprons and to capture any sand grit or large solids prior to entering the downstream structures (i.e. OWS). It is important that the grit chambers be checked daily to ensure that solids are not accumulating to such an extent that grit could be further transmitted through the facility. The grating which covers the top of the grit chamber and allows the surface drainage to enter the structure must also be kept free of heavy accumulations of solids, such as, rags, leaves, etc.

4e. Storm Water By-Pass On a daily basis, the storm water by-pass must be inspected to see if there are any visible signs of oily discharge. Any deficiencies noted should be reported to the EMD, RCRS immediately at telephone 451-1482.

5. Servicing/Maintenance Requests. An OWS that is operating properly will greatly reduce the potential for hazardous substances to flow directly into the Base Wastewater Treatment Plant (WWTP) where, if not removed from the treated effluent, the substance will be discharged to the New River and its associated tributaries. The WWTP is permitted and has permit limitations that cannot be exceeded. When an OWS facility bypasses, the oils and grease will enter the WWTP and may effect the proper treatment of the effluent. Most problems can be avoided by monitoring the system daily, and ensuring that it is serviced on a regular basis.

5a. Oil that accumulates & floats on the surface of the OWS must be periodically removed. The oil should not be allowed to collect to such an extent that it is discharged from the OWS through a bypass chamber or through the wastewater distribution system.

5b. Personnel from the Pollution Abatement Section (PAS), EMD service most of the OWS and grit chambers on a regular basis in order to keep it skimmed before the oil is emulsified. Unit personnel should record on the daily monitoring log for pollution abatement facilities when PAS performs this function.

5c. If the thickness of the oil floating on top of the OWS becomes approximately 2 inches, the operating personnel should contact EMD at telephone 451-1482 to request service for the facility. A ticket number should be requested & recorded on the daily inspection log sheet. To determine if 2" of oil is present, the surface must be disturbed by utilizing a pole or other device to agitate the POL/Used oil.

5d. If oil appears to be bypassing the system, immediately cease operations & contact EMD.

5e. If repairs are required to address structural or mechanical damage to any part of the pollution abatement facility, please contact EMD prior to initiating a work ticket through Operations Section, Public Works. PW work reception number is 451-3001.

	<p>6. <u>Spill Reporting and Response Requirements</u></p> <p>6a. All units are required to have a Unit Level Contingency Plan (ULCP) per Base Order 5090.9. Ensure the ULCP contains policies/procedures for the control & prevention of oil & hazardous material spills. The ULCP must be posted prominently.</p> <p>6b. Any discharges or releases that occur in & around the area of the pollution abatement facilities must be reported immediately to the Fire & Emergency Services Division by phoning 911. A Spill Report must be filled out & forwarded to EMD. Copies of forms can be obtained by the unit ECO or command ECC.</p> <p>6c. Units must stock spill containment & control equipment onsite for use in the event of a spill.</p> <p>6d. Signs are to be posted in the vicinity of the pollution abatement facilities that will indicate the following information:</p> <p style="text-align: center;">IN CASE OF AN OIL OR HAZARDOUS MATERIALS SPILL CALL FIRE & EMERGENCY SERVICES DIVISION AT 911 NOTIFY YOUR COMMANDER/SUPERVISOR IMMEDIATELY</p> <p>The signs must have yellow background & black lettering. Information to purchase the signs can be acquired from the cognizant ECC.</p>
REGULATORY CITATION:	<ul style="list-style-type: none"> • Resource Conservation & Recovery Act • MCO P5090.2A • MCBCL/MCASNR Integrated Contingency Plan (ICP) • MCBCL Stormwater Pollution Prevention Plan
TRAINING:	<p>All Training must be requested through unit ECO -> ECC -> EMD</p> <ul style="list-style-type: none"> • <u>EM 101 – HM/HW Initial Training</u> - Required for all ECOs, ECC • <u>EM108 Pollution Abatement System training</u> • <u>Shop-Level Training Modules</u> – Modules which involve various environmental media topics applicable to shop level personnel <p style="text-align: center;">http://facilities.lejeune.usmc.mil/EMD/training/shoptraining.htm</p>

<p>DEFINITIONS:</p>	<ul style="list-style-type: none"> • Used Oil – Any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities.” Animal and vegetable oils are excluded from this definition. • Discharge of Oil – Discharges that violate applicable water quality standards or cause a film or sheen upon, or discoloration of, the surface of the water or adjoining shoreline or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shores. • Pollution Abatement Facility -- any equipment, plant, treatment works, structure, machinery, apparatus or land, or any combination thereof, acquired, used, constructed or operated for the storage, collection, reduction, recycling, reclamation, disposal, separation or treatment of water or wastes, or for the final disposal of residues resulting from the treatment of water or wastes. • Oil-Water Separator – a waste management unit, generally a tank, that is used to separate oil or organics from water. A separator consists of not only the separation unit but also the forebay & other separator basins, skimmers, grit chambers & bar screens.
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