Environmental Standard Operating Procedures (ESOP)

Title: ESOP 9.02 - HAZARDOUS WASTE (HW) MANAGEMENT PROGRAM

<u>Purpose</u>: This ESOP establishes the procedures for the management and accumulation of HW. These requirements are established by Marine Corps Order 5090.2 to reduce environmental liability of and comply with environmental permits held by and regulations required of Marine Corps Installations East-Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ). This ESOP should be attached to the individual's appointment letter and also be placed into the unit's/department's environmental binder.

Applicability: This title is applicable to all organizations aboard Marine Corps Base, Camp Lejeune (MCB CAMLEJ) to include: any command, active or reserve component; staff organization, or supporting agency which is affiliated with the United States Marine Corps, Department of the Navy, or Department of Defense.

Responsibility: MCIEAST-MCB CAMLEJ subordinate commands and staff sections on MCB CAMLEJ and tenant organizations and contractors on MCB CAMLEJ.

Responsibilities: Environmental Compliance Officers and their assistants, Environmental Compliance Coordinators (ECCs) and their assistants, HM Site Managers, and HM Handlers assigned duties within MCIEAST-MCB CAMLEJ subordinate commands on MCB CAMLEJ and tenant organizations and contractors on MCB CAMLEJ shall comply with the following procedures:

a. HW Satellite Accumulation Area (SAA) Locations. The Environmental Management Division/Resource Conservation and Recovery Section (EMD/RCRS) must approve each HW SAA. Each HW SAA authorization letter and profile will be displayed on/above the HW SAA container location (e.g., flammable locker) as to be visible to personnel placing HW into the container and program auditors.

b. HW SAA Container Management

- (1) As indicated below, HW SAA containers will be clearly marked.
 - (a) Write the words: "HAZARDOUS WASTE."
- (b) Content: Write the noun name found on the specific Hazardous Waste Profile Sheet provided by the EMD/RCRS.
- (c) Write the Hazard Indicator as "Ignitable," "Corrosive," "Reactive," or "Toxic."
- (d) Accumulation Start Date (ASD): The ASD shall be marked on the container once it is filled or on the one-year anniversary of the first waste being placed into the container, whichever comes first. Accumulation of HW in the SAA will not exceed 365 days.
- (2) Ensure HW SAA containers are in good condition, free of defects, and they are not damaged, dented, bulged, or have deep pitted (i.e., severe) rust. If a HW container is not in good condition or if it begins to leak, the contents must be transferred to serviceable DOT-approved containers or overpacked, as appropriate.

- (a) The Marine Depot Maintenance Command (MDMC) Corrosion Repair Facility and Naval Medical Center Camp Lejeune (NMC CL) will transfer the contents from their unserviceable HW SAA containers to serviceable, DOT-approved containers.
- (b) Armories will contact EMD/RCRS when any HW SAA containers become unserviceable.
- (3) HW SAA container closure devices, such as bungs, caps, rings, gaskets, and associated hardware, must also be in serviceable condition.
- (4) HW SAA containers must remain closed except when it is necessary to add or remove waste. A HW SAA container must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- (5) HW SAA containers filled with aqueous solutions, liquids, or sludge will have a proper ullage (i.e., empty space) to allow for expansion.
- (6) Only HW authorized on the HW SAA authorization letter is permitted inside an HW SAA container.
- (7) Properly trained personnel are responsible for coordinating efforts to ensure proper identification, handling, accumulation, and turn-in of HW prior to pick-up. EMD/RCRS provides a Curbside Service normally available Monday through Friday from 0730-1430, to all units/departments accumulating HW. HW appointments are scheduled by completing MCIEAST-MCB CAMLEJ/G-F/EMD/16 Hazardous Material/Waste Turn-In form and emailing it to Lejeune hazmat@usmc.mil. Upon receipt of completed form, EMD/RCRS will schedule curbside appointment for HW pending turn-in.
- (8) No unit/department or any other tenant organization shall transport HW SAA containers.

c. Armory "Day Can" Management

- (1) As indicated below, armory day cans will be clearly marked with the words, "HAZARDOUS WASTE" and "Toxic."
- (2) Day cans will remain in good condition, free of defects, and they are not damaged, dented, bulged, or have deep pitted (i.e., severe) rust. If a HW container is not in good condition or if it begins to leak, the contents must be transferred to serviceable DOT-approved containers or over-packed, as appropriate.
- (3) Day cans must remain closed except when it is necessary to add or remove waste. Day cans must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- (4) Day can(s) will not be located in areas subjecting them to damage by rainwater, flooding, or excessive heat.
- (5) Properly trained armory personnel will ensure armory debris collected in day cans is removed every day at the close of business and placed into the armory's HW SAA container.

- d. <u>Unit Level Contingency Plan</u>. All units/departments are required to have a Unit-Level Contingency Plan (ULCP) containing information necessary to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden releases of HM or HW constituents into air, soil, or surface water. At a minimum, the ULCP for a HW SAA will contain the following:
- (1) A list of points of contact, including but not limited to, phone numbers of the Environmental Compliance Coordinator (ECC) and ECO;
- (2) Information to contact the Fire and Emergency Services Division (dialing 911 satisfies this requirement at the unit/department level);
- (3) Immediate actions that personnel are authorized to take upon discovering any HW spill. This will include actions to give the alarm by either voice command or mechanical device;
- (4) A list of equipment and quantities of material sufficient for conducting spill response actions (units/departments must stock appropriate amounts of spill cleanup equipment onsite for use); and
- (5) A description of evacuation routes and staging areas. Evacuation routes may be the same used in the fire escape plan. The ULCP must state a primary and alternate staging area in the event of an emergency. A staging area is defined as a pre-designated area out of the potential area of danger where personnel will assemble in the event of an emergency.

e. Spill Reporting and Response Requirements

- (1) Any releases or spills that occur in and around the area of responsibility must be reported immediately to the Base Fire and Emergency Services Division by dialing 911. The Unit-Level Contingency Plan shall be activated, and a Spill Report, Form MCIEAST-MCB CAMLEJ/G-F/EMD/5090.91/18, must be completed and forwarded to the command Environmental Compliance Officer (ECO) via the unit ECC or Alternate Environmental Compliance Coordinator (AECC). A copy of the completed Spill Report must also be maintained in the unit's/department's environmental binder. Forms can be obtained by the unit ECC or command ECO and may also be downloaded at https://www.lejeune.marines.mil/Offices-Staff/Environmental-Mgmt/emd-approved-Forms/.
- (2) Signs are to be posted in the vicinity of the HW SAA that will indicate the following information:

IN CASE OF AN OIL OR HAZARDOUS MATERIALS SPILL CALL FIRE and EMERGENCY SERVICES DIVISION AT 911 NOTIFY YOUR COMMANDER/SUPERVISOR IMMEDIATELY

The signs must have yellow background and black lettering. Information to purchase the signs can be acquired from the cognizant ECO.

References:

- (a) MCO 5090.2
- (b) MCIEAST-MCB CAMLEJO 5090.9A
- (c) MCIEAST-MCB CAMLEJO 5090.4B

- (d) ESOP 4.1 ECC Responsibilities
- (e) ESOP 4.2 ECO Responsibilities
- (f) ESOP 4.5 HW Site Manager Responsibilities
- (g) ESOP 4.6 HW Handler Responsibilities
- (h) ESOP 4.9 Deploying Units

Training:

- 1. All HW Site Manager, HW Handlers, and Armory Custodians must complete EMD on-the-job training or receive initial training (EM-101) within 90 days after written assignment followed by an annual review of the initial training (EM-102) within 12 months after completion of initial training. Other personnel that place HW into the HW SAA containers will attend annual On-the-Job Training (OJT). Contact EMD/RCRS via email at lejeune_hazmat@usmc.mil to schedule OJT. OJT only applies to those that do not have any other environmental compliance responsibilities (e.g., underground storage tanks, air quality). If you have been appointed other environmental responsibilities, refer to MCIEAST-MCB CAMLEJ 5090.4B for required training. The OJT training roster signed by EMD/RCRS personnel will be posted with the HW SAA Authorization letter and HW profile.
- 2. Additional EMD-sponsored training that encompasses the requirements of other environmental media within the unit/department as required; refer to the EMD training schedule to determine when these classes are offered.
- 3. All environmental compliance training must be documented in each individual's Environmental Personnel Training Record and available for review.

Record of Revision

Revision	Date	Summary of Change	Signature
Number			
Update		Removed ESOP responsibilities and referenced under References, restructured ESOP	