# MCB Camp Pendleton Environmental Standard Operating Procedure



02 February 2024

# 60-Day Central Accumulation Area Management

A 60-day Central Accumulation Area (CAA) is a location for the collection and storage of hazardous waste for up to 60 days. CAAs operate under the authority of a Unified Program Facility Permit issued by the County of San Diego Department of Environmental Health and Quality, Hazardous Materials Division. These permits allow the permit holder to accept and accumulate waste, and they identify the associated satellite accumulation areas (SAAs) from which they can receive waste. Approval to establish a CAA must be obtained from the unit Commander and the Environmental Security Department.

#### Site Security and Safety

- 1. Fence, lock, or control access to sites at all times.
- 2. Post at least one sign at each 60-day hazardous waste storage site that includes the names and phone numbers for 24-hour emergency contacts.
- 3. Post at least one sign which is legible from 25 feet away that states "CAUTION: HAZARDOUS WASTE STORAGE AREA. UNAUTHORIZED PERSONS KEEP OUT. CUIDADO: ZONA DE RESIDUOS PELIGROSOS. PROHIBIDA LA ENTRADA A PERSONAS NO AUTHORIZADAS."
- 4. Post at least one sign which is legible from 50 feet away that states "NO SMOKING WITHIN 50 FEET."
- 5. Maintain a working communication means (phone, radio, or internal alarm) to immediately contact and summon emergency assistance from the MCB CamPen Fire Department and military police.
- 6. Equip each site with eye washes and spill control supplies.
- 7. Equip each site with fire extinguishers, including special extinguishing equipment such as foam, inert gas, or dry chemicals for the type of wastes managed.
- 8. Perform a weekly inspection of all safety equipment and repair or replace as needed. Use lock-out/tag-out procedures when equipment is not operational and annotate such on the weekly inspection sheet. Once operational, identify on the weekly inspection sheet accordingly.
- 9. Keep secondary containment drain valves closed. If the secondary containment area fills with liquid (e.g. rainwater, hazardous waste), <u>ALWAYS</u> contact Environmental Security Hazardous Waste Section to determine appropriate disposal. Never open drains without Environmental Security Hazardous Waste Section approval.

#### **Site Management**

- 1. Prepare and maintain a Consolidated Emergency Response Contingency Plan for sites that exceed: 500 pounds of a solid substance; 55 gallons of a liquid; 200 cubic feet of compressed gas; or any highly toxic compressed gas with a Threshold Limit Value of 10 parts per million or less.
- 2. Ensure proper personal protective equipment is worn when handling hazardous waste.

- 3. Ensure only appointed and properly trained personnel are authorized to handle hazardous waste or hazardous waste containers.
- 4. Notify the Environmental Security Hazardous Waste Section of new inventory within seven days of the accumulation start date.
- 5. Contact the Environmental Security Hazardous Waste Section in advance of unit deployments for more than two weeks or when personnel responsible for HW activities change.
- 6. Inspect all 60-day HW storage sites weekly according to the site inspection checklist (see the Site Administration Book Environmental Standard Operating Procedures (ESOP)).
- 7. Conduct corrective actions or repairs if discrepancies are found during the weekly site inspection. All corrective actions or repairs must be documented in the weekly site inspection checklist (see Site Administration Book ESOP). Once the corrective action is completed, place the date in the inspection checklist to indicate completed action.
- 8. Report and manage hazardous waste releases (i.e., spills).
- 9. Allow site access for regulatory agency inspections.

#### **Container Management**

- 1. Store containers with in an impermeable, bermed, concrete containment area or hazardous waste storage locker with secondary containment, or on a spill pallet and under a roofed area, if possible.
- 2. Maintain adequate space between containers (minimum 36 inches) so that each container can be inspected from an aisle and wide enough to allow access in case of emergency. Containers should be staged in such a manner that the label is clearly visible.
- 3. Ensure that hazardous wastes are accumulated in the correct container, which must be in good condition, be free of dents and corrosion, and have proper fitting closure rings and bungs and is compatible with the waste being stored.
- 4. Do not stack or place containers on their side.
- 5. Ensure that containers are properly labeled and marked.
- 6. Separate incompatible wastes. Do not mix or dilute hazardous wastes, even if compatible, in the same container.
- 7. Take precautions to prevent the accidental ignition or reaction of ignitable or reactive wastes (e.g., bonding and grounding of containers).
- 8. Ensure there is adequate headspace in the container when accumulating liquids. The below table provides headspace allowance.

#### **Container Headspace Requirements**

Size of Container	Amount of Headspace
55 gallons	4 inches
30 gallons	3 inches
15 gallons	2 inches
Less than 15 gallons	1 inch

- 9. Keep containers tightly closed except when adding or removing hazardous waste.
- 10. Inspect hazardous waste containers weekly.
- 11. Manage empty containers in accordance with the empty container ESOP.

### **Labeling**

- 1. Remove prior labels/markings, if present, before labeling/marking hazardous waste containers.
- 2. Place hazardous waste storage labels on all hazardous waste containers, including aboveground storage tanks, when the first drop of hazardous waste is added to the container.
- 3. Obtain a red and white hazardous waste storage label from ServMart. Use a black felt-tipped permanent marker to mark the label as follows:

Name: Unit name and Reporting Unit Code (RUC) number Address: Building number where hazardous waste is stored

City, State: MCB Camp Pendleton, CA

**Zip**: 92055

Phone: Unit area code and phone number

**Satellite Accumulation Start Date:** If applicable, this is the date that the first drop or piece of hazardous waste was initially placed in the container at a satellite site.

**Accumulation Start Date**: The date that the first drop or piece of hazardous waste was initially placed in the container at the 60-day site or the date that a waste container enters the 60-day site from the satellite site.

**Contents:** Common name of hazardous waste, estimated percentage of hazardous waste in the container, and/or what the waste is contaminated with. Always include the word "waste." See other applicable ESOPs for waste-specific labeling.

**Hazard Class:** Mark appropriate class (ignitable, reactive, corrosive, or toxic). If unsure, refer to product Safety Data Sheet (SDS).

**Physical State:** Mark appropriate physical state (solid, liquid or other e.g. sludge).

- 4. Adhere the label to the side of the container so that it is visible during an inspection. Do not place the label over any other hazardous waste label or markings.
- 5. Place universal waste storage labels on all universal waste containers. Universal waste containers must be marked or labeled with the description "Universal Waste," along with the type of waste stream (lamps, thermostats, cathode ray tubes, batteries, etc.) and the waste accumulation start date.

#### Recordkeeping

- 1. Use the Site Administrative Book format to maintain site documentation for a minimum of 3 years. See the Site Administrative Book ESOP for additional information.
- 2. Keep Safety Data Sheets (SDSs) for all materials stored.
- 3. Refer to the Environmental Security Hazardous Waste Section for copies of 1348's and manifests.

## **CAA Permitted Site Transfers or Closures**

- 1. Submit a written request to the Environmental Security Hazardous Waste Section three months prior to the desired transfer, opening or closure date of a CAA. CAAs must be formally closed if they are no longer needed.
- 2. Remove all HW from the site. Identify and clean up hazardous substance spills.
- 3. Update the Consolidated Emergency Response Contingency Plan for site transfers or when opening a CAA.
- 4. Schedule a final walk-through of the site with the Environmental Security Hazardous Waste Section prior to the closure date. The County of San Diego, Department of Environmental Health and Quality must conduct an inspection prior to final closure.

#### References

(a) MCIWEST-MCB CAMPENO 5090.7A (Hazardous Waste Management)

<u>Use and Version Control</u>: Camp Pendleton uses Environmental Standard Operating Procedures (ESOPs) to augment instructions contained in official orders and directives and, where necessary, to provide for sufficient control of the installation's significant practices. Camp Pendleton maintains the authoritative, current version of this and other ESOPs on the Camp Pendleton website at: <a href="https://www.pendleton.marines.mil/Main-Menu/Staff-Agencies/Environmental-Security/Compliance-Requirements/Environmental-Standard-Operating-Procedures/">https://www.pendleton.marines.mil/Main-Menu/Staff-Agencies/Environmental-Security/Compliance-Requirements/Environmental-Standard-Operating-Procedures/</a>