

# MCB Camp Pendleton Environmental Standard Operating Procedure



11 July 2019

## Hazardous Waste Satellite Accumulation Area

A hazardous waste satellite accumulation area is a location where a hazardous waste generator may accumulate up to 55 gallons of a compatible hazardous waste (i.e., waste oil, used oil, waste antifreeze) for up to 180 days. Use of a satellite accumulation area may only occur under the following conditions:

1. The satellite accumulation area has been approved for use by Environmental Security.
2. The satellite accumulation area is at or near the point of generation (e.g., a motor pool maintenance bay where lubricating oils are drained from vehicles) and under the direct control of the person operating the process (i.e., the mechanic).
3. The satellite accumulation area is associated with a permitted 60-day hazardous waste storage site for waste disposal. [Note: satellite accumulation areas are subject to inspections by Environmental Security and environmental regulators when inspecting the associated 60-day hazardous waste storage site.]
4. The satellite accumulation area is operated in accordance with the following procedures.

### Satellite Accumulation Area Requirements

1. Using the attached template, obtain Environmental Security Department approval to establish and operate a new satellite accumulation area.
2. Establish a written agreement with the owner or operator of the associated permitted 60-day hazardous waste site if the owner or operator of the 60-day site is not of the same Command.
3. Follow the applicable Environmental Standard Operating Procedure for each type of hazardous waste being accumulated.
4. Ensure that the location of the satellite accumulation area is included in the Hazardous Material Contingency Plan of the associated 60-day permitted hazardous waste storage site.
5. Ensure employees are trained in accordance with the environmental training requirements specified in reference (b) and are familiar with all hazardous waste management procedures before handling any hazardous waste.
6. Maintain a means of communication (i.e., phone, cell phone, radio, or internal alarm) to immediately contact the Fire Department in the event of an emergency.

7. Equip each satellite accumulation area with fire extinguishers, spill control equipment, and decontamination equipment (e.g., eyewash station/shower) sufficient for waste being managed.
8. Separate incompatible wastes by means of a dike, berm, wall, or other device.
9. Provide secondary containment for hazardous waste containers holding liquid wastes.
10. Keep secondary containments clean and free of liquids and debris.
11. Affix a hazardous waste label to each container and mark the satellite accumulation start date upon placing the first drop of hazardous waste into it.
12. Conduct weekly site inspections utilizing the most current inspection checklist provided by Environmental Security. Maintain checklists for a period of three years.
13. Do not accumulate more than 55 gallons of any compatible hazardous waste.
14. Do not allow any hazardous waste to accumulate for more than 180 days at the satellite accumulation area.
15. Mark the date the hazardous waste reached its quantity limit or the 180 day accumulation time limit in the accumulation start date location on the hazardous waste label. Transfer the container to the 60-day hazardous waste accumulation site within 72 hours of that date.
16. Contact Environmental Security Department (Hazardous Waste Section) at 760-725-4375/9742/1963/0213 or [PNDL\\_ENV-Hazardous-Waste@usmc.mil](mailto:PNDL_ENV-Hazardous-Waste@usmc.mil) for any additional information or assistance concerning satellite accumulation areas.

## References

- (a) MCO 5090.2 (Environmental Compliance and Protection Program)
- (b) MCIWEST-MCB CAMPENO 5090.5 (Environmental Training)
- (c) MCIWEST-MCB CAMPENO 5090.7A (Hazardous Waste Management)
- (d) Code of Federal Regulations Title 40, Part 112

Use and Version Control: 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: <https://www.pendleton.marines.mil/Staff-Agencies/Environmental-Security/Document-Library/Environmental-Standard-Operating-Procedures/>

## Unit Letterhead

From: Commanding Officer  
To: Commanding General, Marine Corps Installations West-Marine Corps Base  
Camp Pendleton (Attn: Environmental Security Hazardous Waste Section)

Subj: REQUEST FOR SATELLITE ACCUMULATION AREA

1. Request Environmental Security Department review and approval for a hazardous waste satellite accumulation area at (include building number) due to (explain the reason, i.e., change in or new process for managing generated hazardous waste, etc.).
2. (Unit/Agency) understands that Environmental Security must review the location to verify that the accumulation and management of hazardous wastes can be accomplished in accordance with regulatory requirements prior to giving final approval for use.
3. (Unit/Agency) understands that Environmental Security Department personnel must be allowed access to conduct inspections (both internal and regulatory) of each satellite accumulation area.
4. (Unit/Agency) understands that all applicable orders, directives, environmental standard operating procedures, and local, state and federal regulations must be followed for generation and storage of hazardous waste.

I. M. MARINE