

**APPENDIX B
SATELLITE ACCUMULATION AREAS SOP**

THIS PAGE INTENTIONALLY LEFT BLANK

B.1 Purpose

The purpose of this Standard Operating Procedure (SOP) is to establish procedures that ensure the proper management of waste in Satellite Accumulation Areas (SAAs) operated at Naval Construction Battalion Center (NCBC) Gulfport.

B.2 Responsibilities

B.2.1 NCBC Gulfport HW Program Manager (HWPM)

- a. Determine proper waste management standards for NCBC Gulfport and convey these standards to originators through training and by incorporating requirements and standards into NCBC Gulfport instruction, memorandum, Interservice Support Agreement, Memorandum of Agreement, and contract modification if necessary.
- b. Purchase and supply waste containers to originators ensuring the container is properly marked and labeled;
- c. Conduct and or assist in conducting training for waste management personnel provided by Tenant Commands and the applicable NCBC Gulfport Departments, and review/approve any HW training materials used by Tenant Commands;
- d. Provide interpretation of applicable laws, rules and regulations, and incorporate them into NCBC Gulfport instructions;
- e. Maintain organized records of required documentation including logs, SAA inspections, and reports for a minimum of 3 years;
- f. Maintains a Master SAA to include Command, Building Number, Shop and Materials Stored;
- g. Ensure SAAs operate in accordance with this plan;
- h. Conduct and document inspections of SAAs using the Satellite Accumulation Area (SAA) Inspection Form HWPM in Enclosure B-1; and
- i. When potential safety violations are identified, ensure action is taken to either resolve the deficiency or notify the appropriate Department/Tenant Command.

B.2.2 The Commanding Officers, Officers-In-Charge and Department Heads or Senior Civilian of Tenant Commands

- a. Retain liability for the misidentification and/or mismanagement of waste generated by their command;
- b. Ensure personnel are trained in, aware of, and comply with the provisions of this SOP and the HWMP;
- c. Designate in writing a Unit Hazardous Waste Coordinator (HWC) and Alternate, including names, phone numbers, and email addresses. A sample letter is provided in Enclosure B-2. The Appointment Letter will be provided to the NCBC Gulfport HWPM upon request;
- d. Ensure the Unit HWC and Alternate are trained and have the working knowledge to properly manage hazardous, universal, non-Resource Conservation and Recovery Act (RCRA) regulated waste, and used oil; and
- e. Maintain personnel training records to be provided to the NCBC Gulfport HWPM upon request.

B.2.3 The HWCs and Alternates

- a. Ensure waste is properly managed in accordance with the HWMP;
- b. Ensure SAAs are approved by NCBC Gulfport Installation Environmental Program Director before waste is generated;
- c. Maintain approved HW SAAs storage areas in accordance with the HWMP;
- d. Inform NCBC Gulfport HWPM of any changes in materials, work processes, or procedures that may affect HW generation before generating waste;
- e. Schedule pickups and be present during the waste pick-up process unless directed otherwise;
- f. Ensure containers are stored so that the labels are visible when approaching and that there is direct access to each container;
- g. Ensure segregation of incompatible wastes;
- h. Conduct inspections and correct deficiencies using SAA Inspection Form in Enclosure B-1;
- i. Liaison with NCBC Gulfport HWPM regarding waste issues;
- j. The Work Center Supervisor will assume waste management duties during the absence of the assigned HWCs; and
- k. Ensure that the information placed on any label is accurate and legible.

B.2.4 Work Center Personnel

- a. Use HM carefully and sparingly;
- b. Be aware of procedures for handling leaking or damaged containers;
- c. Collect and immediately containerize HW;
- d. Keep HW containers closed except when adding waste;
- e. Properly segregate HW;
- f. Use only approved containers;
- g. Properly manage used oil and oil filters; and
- h. Ensure good housekeeping of SAAs.

B.3 Training

In addition to the General Environmental Training and Command Orientation described above, the HWCs and Alternates assigned to HW duties at tenant commands and NCBC Gulfport Departments shall successfully complete the Annual HW Coordinator training conducted by the NCBC Gulfport HWPM.

B.4 SAA HW Management

The SAAs are HW accumulation areas at or near the point of generation, controlled by the operator generating the waste, and where less than 55 gallons of HW (commonly referred to as the "55 Gallon Rule") or less than 1 quart of acute HW is accumulated at any one time. The 55-gallon limit includes all types of HW, but does not include universal and non-RCRA regulated waste or used oil.

No waste will be disposed into any wastewater treatment system, storm drain, surface waters, or upon the land without proper authorization from NCBC Gulfport Environmental.

An extensive effort shall be made to determine if a HM is usable before it may be disposed of as a waste. To minimize waste generation, utilize good inventory management (e.g., use older material first, check expiration dates, order only what is required, and purchase less toxic or non-HM when possible).

Generators may have more than one SAA; however, each individual SAA shall be approved by NCBC Gulfport Environmental and have signage posted that clearly delineates each SAA. The current list of approved HW SAAs is found in Table B-1.

B.4.1 Container Management Requirements

Containers shall be in good condition (minor surface rust or dents may be allowed) and compatible with the waste stored in them. A container can be defined as any portable device in which a material is stored, transported, treated, disposed, or otherwise managed. Containers used at NCBC Gulfport include Performance Oriented Packaging (POP), steel drums, polyethylene drums, and portable tanks. Types and sizes of containers used are dependent upon factors such as the type of waste, the rate of generation and the treatment/disposal method used. The NCBC Gulfport HWPM or the HW Handler determines the container to be used for each waste at NCBC Gulfport and supplies the information on the label.

Containers shall be properly closed and sealed at all times except when adding waste. The rings on drums shall be positioned with the bolt down and tightened. Proper closure means the following:

- a. All containers are closed per manufacturer's instructions;
- b. Bungs are securely tightened;
- c. Locking rings and bolts are properly secured with the nut tightened enough to prevent any person from loosening the nut using thumb and forefinger;
- d. Lever locks are properly secured with the handle arm properly secured under the safety tab;

NOTE: Lever locks are authorized in an SAA for containers holding solid hazardous and non-HWs. They are not to be used for transfer of waste. Locking rings provide better container integrity in the event of turnover.

- e. Funnel covers and latches are to be secured when waste is not being added;
- f. Gaskets are to be in good working order so to provide the protection intended in the event the container is tipped over or if applicable to the situation to prevent vapor emissions;
- g. Covers on containers will be in good condition with gasket in place and fully functional for the purpose intended;

NOTE: Any rust, dents or crimps affecting a cover in a manner which jeopardizes the integrity of the container is unacceptable; the cover is to be replaced. The NCBC Gulfport HWPM has final authority in determining the proper closure and or condition of a container holding waste at NCBC Gulfport.

- h. There shall be no evidence of spills (e.g., no dry or wet waste on the outside of containers); and
- i. Containers that cannot be properly sealed shall:
 1. Have the contents transferred to a proportionally sized container, or

2. Be placed in an over-pack container.

B.4.2 Waste Segregation

Waste segregation is mandatory. Proper segregation prevents incompatible chemicals from mixing that have the potential to produce heat, pressure, fires, explosions, violent reactions, toxic dusts, mists and irritating or toxic fumes or gases. While safety is the main concern, improper mixing may render the subsequent mixture difficult to identify and expensive to dispose.

General guidance is as follows:

- a. Do **not** mix incompatible wastes (for example, flammable and nonflammable adhesives and corrosives).
- b. Do **not** place containers of unmixed two-part epoxy paint or sealant in the same container.
- c. Do **not** store or mix organic material with corrosives
- d. Do **not** store or mix acids with bases.
- e. Do **not** store two different types of acids in the same container.
- f. Do **not** mix paints with strippers.
- g. Do **not** mix solids and liquids in the same container.
- h. Do **not** mix paint debris (e.g., brushes, rollers, etc.) with liquid paint.
- i. Do **not** mix materials where uncertainty exists. Contact the NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) for assistance.
- j. Do **combine** like wastes where possible. Like waste means HM with the same National Stock Number, Safety Data Sheet number, or generated by the same process such as solid paint debris.
- k. Do **combine** small containers of the same material in a larger container. The NCBC Gulfport HWPM will assist in identifying what may be combined.
- l. Do call the NCBC Gulfport HWPM for assistance before combining materials if in doubt.

B.4.3 Unknown Waste

When an Unknown Waste is generated:

- a. Notify the NCBC Gulfport HWPM;
- b. Label the container with the words "Analytical Pending"; and

- c. Annotate the date the waste was found.

Once a waste stream determination is completed, the container may be relabeled as required. Unknown waste shall be stored as HW and away from potentially incompatible waste.

B.4.4 Container Labeling

Each waste container shall be clearly marked with the contents of the container, using permanent ink pen or marker, prior to any waste being added to the container. Enclosure B-3 includes the Figures for the labels to be placed on containers. The label shown in Figure B-1 is for HW and the label shown in Figure B-2 is for waste not regulated as HW. These labels are placed upon the containers when received at the Less-than-90-Day Storage Facility. The label shown in Figure B-3 is for Universal Waste. General requirements for waste containers include the following:

- a. Containers will be positioned with the words identifying the contents of the container facing outward in such manner to allow a clear view of the words without having to move the containers;

When labels need replacement, the old label(s) must be completely removed prior to affixing a new one; labels are not to be placed over other labels. The NCBC Gulfport HWPM has final authority on proper labeling requirements including label condition.

B.4.5 Waste Turn- In to the NCBC Gulfport Less-Than-90-Day Storage Facility

Waste must be transferred to the Less-Than-90-Day Storage Facility within 3 days of exceeding 55 gallons of HW in an SAA. When waste needs to be turned into the Less-Than-90-Day Storage Facility, the HWC will perform the following:

- a. Call the HW Handler to schedule a waste pick up;
- b. Ensure containers are closed and ready for transport to the Less-Than-90-Day Storage Facility in accordance with Manufacturers and DOT closure requirements;
- c. Ensure the containers are staged for pickup; and
- d. Ensure containers are properly marked.

The HW Coordinator or Alternate shall be present for each pick-up or delivery of waste and discrepancies shall be immediately corrected.

B.5 Spills and Releases

In the event of a spill, personnel should call the NCBC Gulfport Fire Department (911), and state that the spill is at NCBC Gulfport. All hazardous substance spills greater than 1 gallon are to be

reported. Only trained personnel shall attempt to stop and contain the spill, but only if it can be done without endangering their own safety.

Table B-1: List of Approved SAAs

COMMAND	BUILDING	SHOP	STORED MATERIAL
CED	400	D	Waste Paint, Paint Filters Wet-Jet Water, Filters, Garnet Water Filters Aerosol Cans Blast Media and Filters
	400	A	Used Antifreeze, Used Aerosol Cans Used Oil, Used Oil Filters Used Absorbent Materials Lead Acid Batteries, Blast Media Blast Media Filters Parts Washer Liquid Parts Washer Filter Halogen Bulbs
	400	B	Used Antifreeze Used Oil Used Oil Filters Aerosol Cans Used Absorbent Materials Blast Media Blast Media Filter Parts Washer Liquid Parts Washer Filter Lead Acid Batteries Halogen Bulbs
	400	C	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials Blast Media Blast Media Filter Parts Washer Liquid Parts Washer Filter Lead-Acid Batteries Halogen Bulbs
	403		Used Oil Used Oil Filters Used Diesel Fuel Used Fuel Filters Used JP-8 Fuel
Consolidated Hazards Reuse Inventory and Management Program (CHRIMP)	228	CHRIMP	Expired Materials
Morale, Welfare, and Recreation	397	Auto Hobby Shop	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials Lead Acid Batteries
Supply	217	Containerization	Aerosol Cans Expired Materials

COMMAND	BUILDING	SHOP	STORED MATERIAL
NCG-2 Vehicle Maintenance	241	5000 Shop (Support)	Used Oil Filters Gasoline C/W Water, JP-8 C/W Water Parts Washer Fluid Used Absorbent Materials Used Antifreeze Used Aerosol Cans Diesel Fuel C/W Water Lead Acid Batteries
NCG-2 Warehouse	225	Supply	Expired Materials Used Aerosol Cans Used Alkaline Batteries Used Lithium Batteries
NCG-2	291	Armory	Used Absorbent Material Parts Washer Water
NCG-2	260	CCCT	Used Oil Used Oil Filters Used Antifreeze Used Aerosol Cans Used Absorbent Materials
NCG-2	361	Training	Used Aerosol Cans
NCG-2	432	Communications	Nickel Cadmium Batteries Lithium Ion Batteries Alkaline Batteries Lead Acid Batteries
NCG-2	465 North	Building Maintenance Facility	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials Lead Acid Batteries, Used Fuel Filters Gasoline C/W Water JP-8 C/W Water
NCG-2	465 South	Building Maintenance Facility	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials Lead Acid Batteries Used Fuel Filters Gasoline C/W Water JP-8 C/W Water
NCG-2		Wool Market Range	Used Lead Used Absorbent Materials Used Aerosol Cans Used Gasoline Used Diesel Fuel

COMMAND	BUILDING	SHOP	STORED MATERIAL
NCTC Civil Engineering Support Equipment	70	Diesel Shop	Used Antifreeze Used Oil Used Oil Filters Used Transmission Fluid Used Absorbent Materials Lead Acid Batteries Used Absorbent Materials
NCTC Civil Engineering Support Equipment	70	Heavy Shop	Used Absorbent Materials Used Blast Media Parts Washer Filters Used Diesel Fuel
NCTC Civil Engineering Support Equipment	70	Light Chassis Shop	Used Oil Used Oil Filters Used Absorbent Materials Parts Washer Filters Used Blast Media
NCTC	345	Transmission Shop	Used Absorbent Materials Used Hydraulic Fluid
NCTC	346	Electrical Shop Small Engine Shop	Used Absorbent Materials Used Gasoline
NCTC	372	Crane Yard	Used Absorbent Materials
NCTC	241	Vehicle Maintenance Shop	Used Aerosol Cans Used Absorbent Materials Used Oil Used Oil Filters Used Antifreeze Lead Acid Batteries
NCTC	385	Soil Shop	Parts Washer Liquid Parts Washer Filter
Environmental Division	276	Less-Than-90-Day Storage Facility	All hazardous and non-hazardous waste
Naval Reserves	429	Naval Reserves Maintenance Shop	Used Aerosol Cans Used Absorbent Materials Used Oil Used Oil Filters Used Antifreeze
Marine Corps	243	Vehicle Maintenance	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials Lead Acid Batteries
Army Warehouse	215	Army Reserves	Used Oil Used Oil Filters Used Absorbent Materials Lead Acid Batteries Used Aerosol Cans

COMMAND	BUILDING	SHOP	STORED MATERIAL
Homeland Security	298	Maintenance Shop	Used Antifreeze Used Oil Used Oil Filters Used Aerosol Cans Used Absorbent Materials
NEX	448	Barber Shop	Aerosol Cans
Dental	295	Dental	Used Amalgam Used Filters
Expeditionary Combat Services	122	Training	Used Alkaline Batteries Used Lithium Batteries
Medical	295	Clinic	Pharmaceuticals

ENCLOSURE B-1
SATELLITE ACCUMULATION AREA INSPECTION FORM

Satellite Accumulation Area (SAA) Inspection Form			
Date:	Time:		
Command:	Bldg. Location:		
POC:	Telephone #:		
Inspector's Name:	Signature:		
INSPECTION ITEMS	YES	NO	COMMENTS
1. Are containers in good condition with no or minimal dents or corrosion?			
2. Are containers labeled Hazardous Waste or with other words identifying contents?			
3. When quantity of waste reaches 55 gallons, is waste transferred to the Less-than-90-day Storage Facility within 72 hours?			
4. Are containers properly closed?			
5. Is the Satellite Accumulation Area located at or near the point of generation?			
6. Is the hazardous accumulation limited to less than 55-gallon (or 1 quart Acute) of total accumulated hazardous waste?			
7. Is the 2-inch expansion rule in liquid containers complied with?			
8. Are accumulation/fill dates marked once 55-gallon limit is reached?			
9. Is waste compatible with the container?			
10. Are incompatible wastes kept separate?			
11. Is proper aisle space maintained?			
12. Is the SAA clean (no signs of spillage) and are containers non-leaking?			
13. Are liquid waste containers placed in a berm area, or an area which will contain all leaks?			
14. Is a fire extinguisher available within 50 ft.?			
15. Is housekeeping neat and clean in all areas?			
16. Is there a spill kit in the accumulation area?			
17. Are containers inspected weekly?			
18. Does the assigned Hazardous Waste Coordinator and Alternate have proper training?			
19. Are training records maintained for three years?			
Comments:			

ENCLOSURE B-2
SAMPLE LETTER:
APPOINTMENT OF UNIT HAZARDOUS WASTE COORDINATOR OR ALTERNATE

Memorandum

Date

From: [insert Commanding Officer/Officer-In-Charge name, unit]

To: [insert employee's name]

Subj: APPOINTMENT OF UNIT HAZARDOUS WASTE COORDINATOR or ALTERNATE

Ref: (a) NCBC Gulfport Instruction 5090.1A, Hazardous Waste Management Plan

Per reference (a), you are hereby designated as the Command Hazardous Waste Coordinator [or alternate], effective [insert date]. This assignment will remain in effect until revoked in writing. You will be required to complete hazardous waste training within six months of your assignment to this position. Your training will be provided and funded by [insert funding organization]. Additional information regarding training will be provided to you at a later date.

The following information will provided to the Environmental Department for their records:

Command Hazardous Waste Coordinator Name

Phone Number

Email Address

Command Hazardous Waste Coordinator Alternate

Phone Number

Email Address

Location (building number)

Signature Block

ENCLOSURE B-3
WASTE LABEL SAMPLES

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

**IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY**

GENERATOR INFORMATION:

NAME: _____

ADDRESS: _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. _____ EPA WASTE NO. _____

ACCUMULATION START DATE _____ MANIFEST TRACKING NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Figure B-1: Sample Hazardous Waste Label (Yellow)

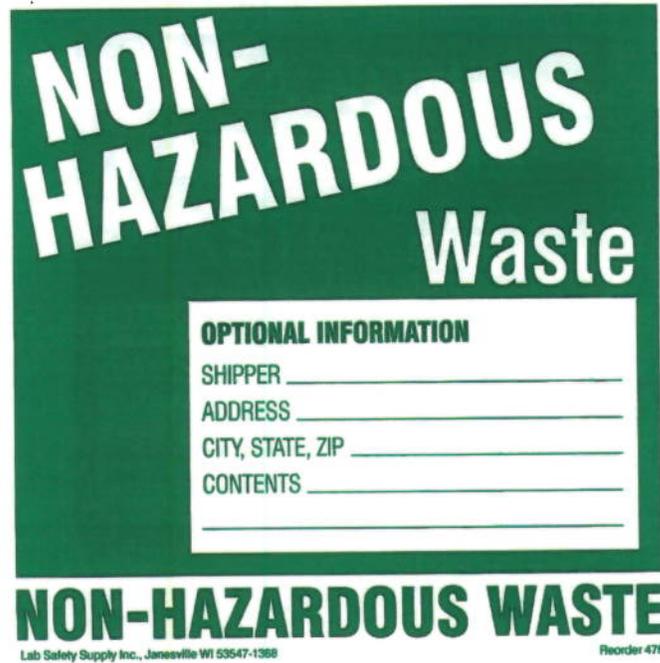


Figure B-2: Sample Non-Hazardous Waste Label (Green)

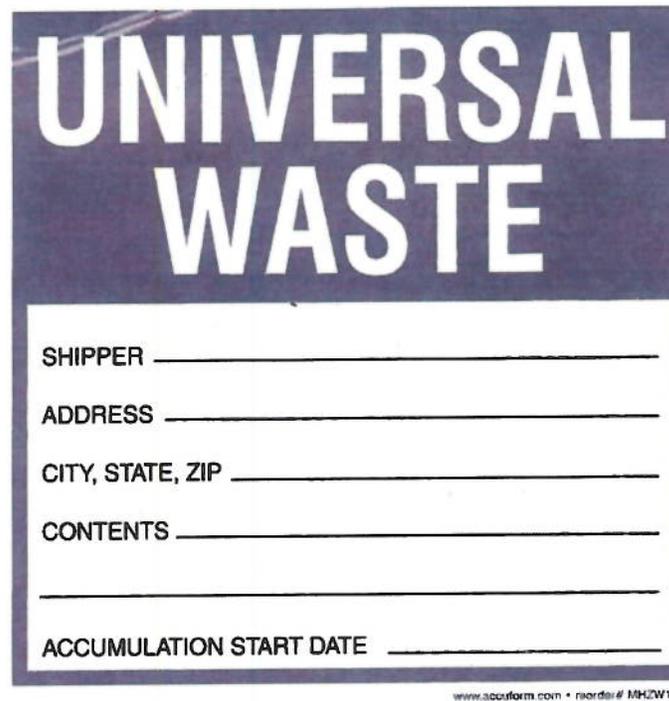


Figure B-3: Sample Universal Waste Label (Purple)