

APPENDIX F

UNIVERSAL WASTE MANAGEMENT SOP

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F.1 Purpose

This Standard Operating Procedure establishes procedures for the management of universal waste (UW) by all activities and contractors operating at Naval Construction Battalion Center (NCBC) Gulfport. If activities choose not to manage these wastes as UW, the wastes shall be managed as hazardous waste per the NCBC Gulfport Hazardous Waste Management Plan (HWMP).

F.2 Definitions

The federal UW regulations are set forth in 40 Code of Federal Regulations (CFR) Part 273 and include batteries, pesticides, mercury-containing equipment, and bulbs (lamps). A short list of definitions is provided for a quick reference. A list of definitions is found in Section 2.0 of the HWMP and in the regulations.

Accumulation Start Date for UW is the date that the first piece of waste is placed in the container. Failure to date a UW container is a violation that could result in fines and/or penalties.

Mercury-Containing Equipment is any device or part thereof (excluding batteries and lamps) that contains elemental mercury.

Pesticide is any substance or mixture intended for preventing, destroying, repelling, or mitigating any pest or intended for use as a plant regulator, defoliant, or desiccant.

Common UW lamps include fluorescent, high intensity discharge, neon, mercury vapor, high-pressure sodium, and metal halide.

F.3 Responsibilities

F.3.1 NCBC Gulfport Hazardous Waste Program Manager (HWPM)

The NCBC Gulfport HWPM shall provide guidance for compliance with this HWMP for UW.

F.3.2 Originators

Originators shall manage UW.

F.4 Large Quantity Handler of Universal Waste

A Large Quantity Handler of Universal Waste (LQH UW) is defined as a UW handler that accumulates 5,000 kg or more of UW (batteries, pesticides, thermostats or lamps, calculated collectively) at any time. Based upon current operations, NCBC Gulfport qualifies as a

LQHUW. 40 CFR 273, Subpart C outlines the standards for LQHUWs. The term handler includes a generator of UW.

F.4.1 Notification

LQHUWs are required to send written notification of UW management to the United States Environmental Protection Agency (EPA) Regional Administrator (or State, if the State has adopted the Federal HW regulations in 40 CFR by reference and received EPA authorization to manage its own HW management program) before meeting or exceeding the 5,000-kilogram storage limit. Because NCBC Gulfport has already notified the USEPA of its HW management activities and has received an EPA Identification number, there is no need to notify the Mississippi Department of Environmental Quality (MDEQ) of UW activities.

F.4.2 LQHUW Management

A LQHUW must manage UW in a manner that prevents releases of any UW, or component of a UW, to the environment.

F.5 UW Management

Immediately containerize all UW as soon as it is generated. UW may be stored up to 1 year from the date the first waste is placed in the container. To avoid storing UW for more than 1 year, contact NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) when a container is 10 months old to arrange for disposal.

The UW containers shall be labeled as shown in Figure F-1, and shall include the date the first waste was placed in the container.

F.5.1 UW Segregation

The types of UW that may be accumulated include: batteries, lamps, mercury-containing equipment, and pesticides. The UW shall be segregated by type of waste. When containerizing batteries, separate containers shall be used for each type of battery.

F.5.2 Battery Management

F.5.2.1 Lead Acid Batteries

Lead acid (car type) batteries shall be stored to prevent spills. Broken batteries (i.e., breached casing) must be managed as hazardous waste (HW) including any spilled acid. Non-leaking batteries are exempted from most HW regulations if recycled.

Caution: Lead acid batteries that are leaking are HW and must be managed as such. Contact the NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) for assistance.

F.5.2.2 Non-Lead Acid Batteries

Non-lead acid batteries (i.e., Nickel Cadmium, Nickel Halide, Magnesium, Lithium, Mercury, Alkaline, etc.) shall be segregated by battery type into proportionately sized structurally sound containers meeting Department of Transportation (DOT) specifications. The UW containers shall be labeled as shown in Figure F-1 and shall include the date the first battery was placed in the container.

Both terminal ends of Nickel Cadmium, Nickel Halide, Magnesium and 9 Volt Alkaline batteries shall be taped. Lithium batteries shall be placed in a plastic bag prior to containerizing.

F.5.2.3 Fluorescent Lamp Management

Unbroken lamps shall be stored in structurally sound containers per DOT regulations. The containers shall be kept closed except when adding lamps. The original box or a two- or three-ply cardboard box are appropriate containers for unbroken lamps. The UW containers shall be labeled as shown in Figure F-1 and shall include the date the first lamp was placed in the container.

Broken lamps shall NOT be placed in containers labeled as UW. Broken lamps are HW and must be managed as such. Follow labeling procedures for HW based upon the type of accumulation area that is used (satellite storage area or less-than-90-day area). Follow all applicable sections of the NCBC Gulfport HWMP when handling broken lamps as HW.

F.5.2.4 Mercury-Containing Devices

Place mercury-containing devices into a structurally sound container compliant with DOT regulations. The containers shall be kept closed except when adding waste.

Mercury-containing devices that are not in a sealed ampule must be placed inside a sealed air-tight casing. The UW containers shall be labeled as shown in Figure F-1, and shall include the date the first mercury-containing device was placed in the container.

Mercury spills must be properly cleaned up and the recovered mercury managed as HW. Immediately contact NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) and the NCBC Gulfport Safety Officer if a mercury spill occurs.

F.5.2.5 Pesticides

Pesticides shall be stored in a closed structurally sound container compliant with DOT regulations. The container shall be kept closed except when adding waste. The UW containers shall be labeled as shown in Figure F-1, and shall include the date the first pesticide was placed in the container.

F.5.2.6 UW Turn-In

Contact NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) to schedule a turn-in when a container is full or when the UW has been stored for 10 months.

F.6 Recordkeeping

Although UW does not have the same requirements as HW, shipments of UW must have the proper shipping papers for transportation. All shipping papers, manifests, contracts, etc. shall be maintained by the NCBC Gulfport HWPM for a minimum of 3 years.

The image shows a purple rectangular label with white text. At the top, the words "UNIVERSAL WASTE" are written in large, bold, white capital letters. Below this, there is a white rectangular area containing five lines of text, each followed by a horizontal line for writing: "CONTENTS", "ACCUMULATION START DATE", "SHIPPER", "ADDRESS", and "CITY, STATE, ZIP". At the bottom left of the purple label, the text "Lab Safety Supply Inc." is printed. At the bottom right, "Reorder No. 42109" is printed.

Figure F-1: Sample Universal Waste Label (Purple)