

**APPENDIX C**  
**LESS-THAN-90-DAY STORAGE FACILITY SOP**

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## **C.1 Purpose**

The purpose of this Standard Operating Procedure (SOP) is to establish procedures for the proper management of waste in Less-Than-90-Day Storage Facility.

## **C.2 Responsibilities**

### *C.2.1 Naval Construction Battalion Center (NCBC) Gulfport Hazardous Waste Program Manager (HWPM)*

The NCBC Gulfport HWPM shall perform the following:

- a. Receive training per Section C.4 of this Appendix;
- b. 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.
- c. Purchase and supply waste containers to originators, ensuring the container is properly marked and labeled;
- 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, Less-Than-90-Day Storage Facility inspections, and reports for a minimum of 3 years; and
- f. When potential safety violations are identified, ensure action is taken to either resolve the deficiency or notify the appropriate department/Tenant Command.

### *C.2.2 Hazardous Waste Handlers*

The responsibilities of the NCBC Gulfport HW Handlers include the following:

- a. Receive training per Section C.4 of this Appendix;
- b. Provide liaison with NCBC Gulfport work centers;
- c. Transport HW containers within the NCBC Gulfport complex in a safe, compliant, and timely manner;
- d. Ensure waste containers are sound and properly labeled and manage and handle waste containers in a manner to avoid damage or content spillage;
- e. Notify the EC in the event of an emergency;

- f. Repackage materials as required;
- g. Assist the Fire Department in spill response;
- h. Maintain the Less-Than-90-Day Storage Facility in a safe, efficient, orderly, and compliant manner;
- i. Perform compliance inspections of the Less-Than-90-Day Storage Facility;
- j. Identify any condition that is, or may be, of danger to personnel or the environment and (if properly trained and safe to act upon) take immediate action(s) to protect these resources; and
- k. Immediately bring dangerous or non-compliant situations to the attention of the NCBC Gulfport HWPM.

### **C.3 Training**

The training requirements of the NCBC Gulfport HWPM and HW Handler include the following:

- a. The Occupation Safety and Health Administration (OSHA) 24-hour Hazardous Substance Incident Response Management Course and the 8-hour refresher training on an annual basis in accordance 29 CFR 1910.120;
- b. The RCRA HW generator training required by 40 CFR 262.34(a)(4) and 40 CFR 295.16 for large quantity generators;
- c. The DOT training required to sign manifests and shipping papers stated in 49 CFR 172 every 3 years;

Respiratory training must be performed before any worker is required to wear a respirator.

### **C.4 Less-Than-90-Day HW Management**

Containers of HW may remain in the Less-Than-90-Day Storage Facility for less than 90 days, and must be transferred or shipped to a permitted HW Transfer, Storage, or Disposal Facility. Failure to remove HW within the required timeframe results in a violation of State and Federal regulations.

Waste containers are transferred to the Less-Than-90-Day Storage Facility, and the contents of the container shall be clearly marked with permanent ink pen or marker. In certain circumstances, personnel other than the HW Handler may transport waste containers in a government/contractor vehicle. Containers of HW shall **not** be placed in a private vehicle.

#### *C.4.1 Waste Management in the Less-Than-90-Day Storage Facility*

Waste transferred to a Less-Than-90-Day Storage Facility shall be labeled as identified and described in Section C.4.6 of this SOP; sample labels are found in Enclosure C-1.

The Less-Than-90-Day Storage Facility shall have the following:

- a. Have access controlled at all times (e.g., keep area locked except when the staff is present); Have weather resistant signs posted and clearly visible from a distance of 50 feet on all exterior sides of the area with the words: "NO SMOKING WITHIN 50 FEET";
- b. Have weather resistant signs posted and clearly visible from a distance of 25 feet with the words: "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT" and "HAZARDOUS WASTE STORAGE AREA";
- c. Have sufficient aisle space between rows of pallets of containers to allow for the unobstructed movement of personnel for fire protection, spill control and access to decontamination equipment;
- d. Position each container so that the label is clearly visible when approaching the containers for inspection;
- e. Have containers stored so they may be accessed directly (i.e., nothing stored in front of the containers);
- f. Separate incompatible waste using berms, dikes, spill pallets, or other means to prevent incompatible materials from coming into contact with each other in the event of a spill;
- g. Have a fire extinguisher and an eyewash station positioned so that it is immediately accessible in an area that would not be affected by a spill;
- h. Ensure proper inspection of the fire extinguisher and the eyewash station and maintain documentation;
- i. Maintain the internal communication device (telephone or two-way radio) capable of summoning emergency assistance;
- j. Maintain the spill kit; and
- k. Update the Contingency Plan as necessary.

##### *C.4.1.1 Spill Kit*

A spill kit and emergency response equipment will be available and maintained. The spill kit will be clearly marked and located in an accessible area. Contents of the spill kit will include the following:

- a. Material and equipment necessary to contain and clean up spills, (i.e., non-sparking shovel and dust pan);
- b. Absorbent material that is compatible with the waste stored in the Less-Than-90-Day Storage Facility;
- c. Personal protective equipment including gloves, face shields, rubber boots, etc.; and
- d. Sufficient container(s) and label(s) to properly clean up a spill and the debris thereof.

#### C.4.1.2 Contingency Plan

The Contingency Plan for the NCBC Gulfport Less-Than-90-Day Storage Facility is a "stand-alone" document and is included in the NCBC Gulfport HWMP as Appendix K. The Contingency Plan must be immediately reviewed and amended whenever the following happens:

- a. There is a revision of applicable regulations;
- b. The plan fails in an emergency;
- c. The facility changes (i.e., its design, its emergency equipment or any other changes that increase the potential for fires, explosions or releases of HW; or
- d. The Emergency Coordinator changes.

All spills or incidents shall be immediately reported to the NCBC Gulfport Fire Department.

#### C.4.2 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 determines the container to be used for each waste at NCBC Gulfport; the information is provided with WSD documentation.

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. All containers will be kept closed except for when adding and waste. 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-hazardous wastes. 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 that 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 the 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);
- i. Containers that cannot be properly sealed shall have the contents transferred to a proportionally-sized container or be placed in an over-pack container.

#### *C.4.3 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, such as HM with the same National Stock Number, Safety Data Sheet number, or generated by the same process such as solid paint debris; and
- k. Do **combine** small containers of the same material in a larger container with guidance from the NCBC Gulfport HWPM.

#### C.4.4 *Unknown Waste*

When an Unknown Waste is generated, the following needs to occur:

- 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 WSD is completed, the container may be relabeled as required. Unknown waste shall be stored as HW and away from potentially incompatible waste.

#### C.4.5 *Container Labeling*

Proper labels must be affixed to the container prior to any waste being added to the container. Enclosure C-1 includes the Figures for the labels to be placed on containers. The label shown in Figure C-1 is for HW and is provided by the NCBC Gulfport HWPM. The label shown in Figure C-2 is provided for waste not regulated as HW. The label shown in Figure C-3 is for Universal Waste. General requirements for waste containers include the following:

- a. Containers will be positioned (labels facing outward) in such manner to allow a clear view of the labeling without having to move the containers;
- b. All labels will be on the same side and approximately affixed in the middle-third of the container;
- c. Labeling information will be neat, legible and marked using black indelible ink as containers with labeling information that is inaccurate, marred and or illegible are not acceptable; and
- d. The accumulation start date is to be marked on the label on any HW container transferred from an SAA to the Less-Than-90-Day Storage Facility.

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.

Emission control requirements applicable to HW are identified in 40 CFR 264 Subparts AA, BB, and CC and are complied with by using the DOT POP and keeping containers closed except when adding waste.

#### *C.4.6 Empty Drums*

The number of empty drums in the facility should be limited to spill clean-up and minimum supply needed to continue operations. All empty drums shall be stored upside down or on their side to indicate they are empty.

#### *C.4.7 Inspections*

The Less-Than-90-Day Storage Facility shall be inspected, at a minimum, once a week using the inspection form shown in Enclosure C-2. The inspection form shall be retained for a minimum of 3 years. Refer to Section C.3 for responsibilities regarding inspections.

### **C.5 Transfer of Waste to the Transfer, Storage, and Disposal Facility (TSDF) from the NCBC Gulfport Less-Than-90-Day Storage Facility**

HW that is transferred from a SAA to the Installation's less than Less-Than-90-Day Storage Facility is not required to follow Department of Transportation requirements for labeling, packaging, marking and manifesting while being transferred from one location to another at NCBC Gulfport.

HW is typically shipped to the TSDF from the Less-Than-90-Day Storage Facility at Building 276 through DLA. The NCBC Gulfport HWPM provides the waste information to DLA, and DLA shall provide a delivery order listing the waste to be picked up, the Contract Line Item Number and the cost for each container. DLA will, when authorized by the contracting officer or their representative, contact the disposal contractor and make arrangement for the transportation of the waste offsite.

### **C.6 Spills and Releases**

In the event of a spill, personnel should call 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.

ENCLOSURE C-1  
SAMPLE CONTAINER LABELS

**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 C-1: Sample Hazardous Waste Label (Yellow)



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

A purple rectangular label with white text and lines. The top half contains the words "UNIVERSAL WASTE" in large, bold, white capital letters. Below this, there are five horizontal lines for text entry, each preceded by a label: "SHIPPER", "ADDRESS", "CITY, STATE, ZIP", "CONTENTS", and "ACCUMULATION START DATE".

UNIVERSAL  
WASTE

SHIPPER \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY, STATE, ZIP \_\_\_\_\_

CONTENTS \_\_\_\_\_

ACCUMULATION START DATE \_\_\_\_\_

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**Figure C-3: Sample Universal Waste Label (Purple)**

ENCLOSURE C-2  
LESS-THAN-90-DAY STORAGE FACILITY INSPECTION FORM

<b>Hazardous Waste Less-Than-90-Day Storage Facility Inspection Form</b>				
<b>Date:</b>		<b>Time:</b>		
<b>Bldg. Location:</b>		<b>POC:</b>		
<b>Inspector's Name:</b>		<b>Signature:</b>		
<b>INSPECTION ITEMS</b>		<b>YES</b>	<b>NO</b>	<b>COMMENTS</b>
1. Has all accumulation of hazardous waste been limited to a time less than 90 days?				
2. Is the accumulation start date clearly marked and visible for inspection on each container?				
3. Is each container or tote/tank clearly marked with the words "Hazardous Waste?"				
4. Are hazardous wastes compatible with the containers in which they are stored?				
5. Are all containers in the accumulation area maintained in good condition?				
6. Are all containers free of leaks, bulging, and corrosion?				
7. Are all containers kept closed in accordance with DOT regulations and mfg. specifications?				
8. Is aisle space maintained at a minimum of 24 inches?				
9. Is the containment system free of cracks or gaps?				
10. Is the sump or collection area free of spilled or leaked waste?				
11. Are incompatible wastes separated by means of a dike, berm, wall or other device?				
12. Are the containers protected from sources of ignition or reaction?				
13. Are smoking and open flame confined to specifically designated locations?				
14. Are "No Smoking" signs placed wherever there is a hazard from ignitable or reactive waste?				
15. Does the area have a "Hazardous Waste" sign posted?				
16. Is the area secured with a lock or other positive means to prevent access by unauthorized personnel?				
17. Is lighting in the area sufficient to identify leaks and spills?				
18. Are appropriate spill clean-up materials readily available?				
19. Is a copy of the RCRA Contingency Plan available?				
20. Do wastes requiring sampling have "Pending Analysis" labels filled out correctly?				
21. Are used oil storage tanks maintained in working order and inspected weekly along with the Less-Than-90-Day Storage Facility?				
22. What is the latest HW container Accumulation Start Date?				
23. Conduct weekly test of the eyewash and shower?				
<b>ADDITIONAL COMMENTS:</b>				

ENCLOSURE C-3  
SAMPLE MANIFEST DESIGNATION LETTER



DEPARTMENT OF THE NAVY  
NAVAL CONSTRUCTION BATTALION CENTER  
4902 MARVIN SHIELDS BLVD  
GULFPORT, MS 39501-5001

IN REPLY REFER TO:  
5090  
Ser 410/

From: Commanding Officer, Naval Construction Battalion Center,  
Gulfport  
To: Director, Environmental Division, Naval Construction  
Battalion Center, Gulfport

Subj: AUTHORITY TO SIGN HAZARDOUS WASTE AND ASBESTOS MANIFESTS

Ref: (a) OPNAVINST M-5090.1

1. Per reference (a) paragraph 27-3.5 (1) the following personnel are authorized to sign as Generator on behalf of the Commanding Officer on Hazardous and Non-Hazardous Waste Manifests.

<u>NAME</u>	<u>RANK</u>
Mr. Stanley Smith	GS-12
Mr. Jerry Laster	GS-09

2. Personnel will become thoroughly familiar with all of their duties and responsibilities as specified in reference (a), and other pertinent directives in the performance of their duties.

3. This designation remains in effect until transfer from this Command, or changes in Commanding Officers.

C. M. Hansen

Copy to:  
Environmental Division

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