



Standard Operating Procedure 005: Potentially Hazardous Products – Procurement, Use, Reporting, and Disposal

1.0 PURPOSE

This procedure serves to improve compliance with the Resource Conservation and Recovery Act (RCRA) and 40CFR273 Universal Waste Management Rule by preventing the use of paints, chemicals, cleaners and/or degreasers which may be unsafe and/or not authorized for discharge to the wastewater treatment system

2.0 REFERENCES

- 2.1 ISO 14001 Standard (Operational Control)
- 2.2 Resource Conservation and Recovery Act (RCRA)
- 2.3 40 CFR 273 Universal Waste Management Rule (Virginia has adopted this rule)
- 2.4 40 CFR Part 370 (Tier 2 Reporting)

3.0 SCOPE AND RESPONSIBILITIES

3.1 Scope- This SOP is applicable to any activity within the scope of the EMS program.

3.2 Responsibilities-

3.2.1. Employees generating waste are responsible for proper container labeling, which involves proper Accumulation Start Date and proper name of contents.

3.2.2 Maintenance Managers & Operation Managers and assistant managers are responsible for proper waste labeling training for employees.

3.2.3 Maintenance Managers & Operation Managers and assistant managers are responsible for the oversight of proper labeling for all containers within their area of responsibility.

3.2.4 Environmental department responsible for the annual Tier 2 submittal.

4.0 REQUIREMENTS

4.1 Procurement of materials, paints, chemicals, cleaners and/or degreasers or other potentially hazardous products.

4.1.1 Due to the potentially dangerous nature while in use, storage, and disposal of some items, prior to the purchase, an SDS shall be requested and reviewed by the buyer or manager.

4.1.1.1 The procurement of any item(s) shall be limited to a hazardous material classification of equal to or less than one (1) for all categories (health, fire, and reactivity). See attached hazardous material classification diagram.



- 4.1.1.2 Should the purchase of any item(s) exhibiting a classification over a one (1) in any category of the hazardous material classification diagram, approval prior to purchase by the Safety and the Environmental Departments must be received. See attached approval form.
 - 4.1.1.3 At no time shall a listed hazardous material be purchased with prior approval of the Safety and Environmental Departments.
 - 4.1.2 Use of cleaners and/or degreasers Proper personal protective equipment (PPE) will be worn at all times based upon the manufacturers use instructions.
 - 4.1.3 If the product is in a concentrated state, the manufacturers' requirements for mixing or dilution of the product shall be followed including the use of personal protective equipment (PPE). The container containing the diluted product will be identified with the product name and the concentration value. The manufacturers' requirements for use will be followed.
 - 4.1.4 If the product is pre-mixed, the manufacturers' requirements for use will be followed.
 - 4.1.5 All products covered by this SOP will be stored either in a covered shelter, on containment pallets on the container and equipment wash area pad, or in a ventilated structure approved for storage of the items being stored. All products and containers must be properly secured after use.
- 4.2 Disposal of paints, chemicals, cleaners and/or degreasers
 - 4.2.1 Empty drums or containers containing product will be rinsed at the container and equipment wash area and disposed of either in general trash or in a recycled metal container.
 - 4.2.2 Drums or containers that have product remaining will be placed in a covered, designated area, on containment, until collected and disposed of by an authorized waste hauler. All attempts should be made to use the product for its intended purpose prior to disposal to minimize disposal costs, record keeping, and storage.
 - 4.2.2.1 A manifest shall be received from the disposal company and maintained on file to show proof of proper disposal.
- 4.3 **Under no condition or circumstance will concentrated or diluted paints, chemicals, cleaners and/or degreasers be disposed of directly into the wastewater treatment or storm water collection systems at any time. All releases shall be reported immediately to Port Police.**
- 4.4 **Contact the Safety or Environmental Department if there are questions prior to purchase of potentially hazardous products.**
- 4.5 **Tier 2 Reporting**



- 4.5.1 All chemicals stored and used on the port which require a SDS to be maintained on site, must be reported in the annual Tier 2 report, **which is due March 1** of each calendar year.
- 4.5.2 Chemicals on listed on the EPA's Extremely Hazardous Substance (EHS) list must be reported on the Tier 2 report.
- 4.5.3 Tier 2 Requirements and the EPA's EHS list are located in the links below:
 - 4.5.3.1 Requirements : <https://www.gpo.gov/fdsys/pkg/CFR-2016-title40-vol30/pdf/CFR-2016-title40-vol30-part370.pdf>
 - 4.5.3.2 EHS List <https://www.ecfr.gov/cgi-bin/text-idx?SID=2b4d2d375e73ebc5c93d8b2fe632cb6f&mc=true&node=pt40.28.355&rgn=div5>
- 4.5.4 Tier 2 reports are to be submitted using the Tier2 Submit software and are submitted electronically.
 - 4.5.4.1 Download the latest Tier2 Submit software here: <https://www.epa.gov/epcra/tier2-submit-software>

5.0 CONSEQUENCES OF DEVIATION FROM PROCEDURE

Deviations from this procedure may result in the improper procurement, use, disposal, or the improper record of disposal of universal/hazardous waste. Both the improper record of disposal or improper disposal of wastes could result in fines and/or notices of violation from the Virginia Department of Environmental Quality (DEQ), Hampton Roads Sanitation District (HRSD), and/or the Environmental Protection Agency (EPA) and/or could result in harm to individuals or the environment.

6.0 ATTACHMENTS (Controlled Documents)

Not applicable

7.0 RECORDS FOR MONITORING AND MEASURING

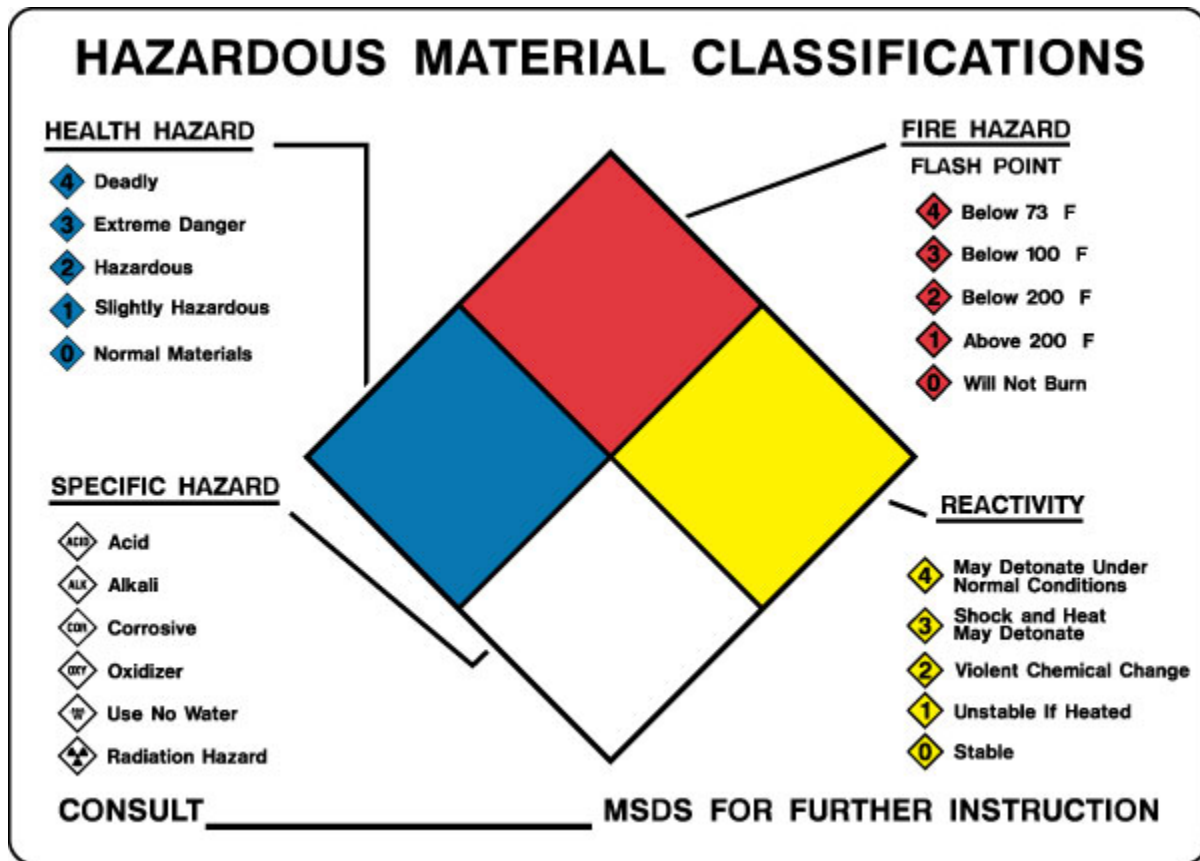
- 7.1 Applicable product Safety Data Sheet (SDS)
- 7.2 Applicable disposal records

8.0 DEFINITIONS

Not required

9.0 REVISION HISTORY

- 9.1 Effective Date: 11/10/2009
- 9.2 Latest Revision Date: 6/27/17 –added Tier 2 requirements. 11/10/16 – Changed procurement procedure, added hazardous material classification diagram and procurement approval form. 11/13/13- updated division titles. 7/11/12 – combined to one SOP for all terminals. 11/10/2009
- 9.3 Approval: Scott Whitehurst, Director, Environmental Policy and Compliance
- 9.4 Last Reviewed: 12/12/18
- 9.5 Reviewer: Billy Goodson, Environmental Compliance Specialist





Potentially Hazardous Procurement Approval

The use of this form is to coincide with the proper application of SOP 5: Approved Chemicals for Use when at such time it is necessary to purchase a product exhibiting hazardous characteristics over a one (1) based on the Hazardous Material Classification diagram contained in SOP 5.

I certify that it is necessary to purchase this product based on a Port need and that I have reviewed the applicable SDS and have on hand the appropriate personal protective equipment (PPE) for my staff to use. I have also researched safer products which may be used in the course of operations and could not find an acceptable substitute.

Please include the applicable SDS with this form for review.

Product Name: _____

Hazardous Material Classification (0-4):

Health: _____

Fire Hazard: _____

Reactivity: _____

PPE Required: _____

Print, Sign, and Date to indicate your approval to purchase this product.

Manager: _____

Buyer: _____

Safety Representative: _____

Environmental Representative: _____

Retain a copy of this form for your records for future review.