



Standard Operating Procedure 006: Universal, Hazardous, and Non-Hazardous Waste Management Procedure

1.0 PURPOSE

This procedure serves to improve compliance with the Resource Conservation and Recovery Act (RCRA), 40 CFR 279 Used Oil Standard, and 40 CFR 273 Universal Waste Management Rule by separating and disposing of used, hazardous and non-hazardous materials generated in maintenance activity from the municipal waste stream.

2.0 REFERENCES

- 2.1 40 CFR Parts 261-262 Resource Conservation and Recovery Act (RCRA)
- 2.2 40 CFR 273 Universal Waste Rule
- 2.3 40 CFR 279 Used Oil Standard
- 2.4 NIT EPA ID – VAR000503177 (Conditionally Exempt Small Quantity Generator)
- 2.5 NNMT EPA ID – VAR000505867 (Conditionally Exempt Small Quantity Generator)
- 2.6 PMT EPA ID – VAR000505834 (Conditionally Exempt Small Quantity Generator)
- 2.7 VIG EPA ID – VAR000514836 (Conditionally Exempt Small Quantity Generator)
- 2.8 VIP EPA ID – VAR000505842 (Conditionally Exempt Small Quantity Generator)
- 2.9 RMT EPA ID – VAR000532853 (Conditionally Exempt Small Quantity Generator)

3.0 SCOPE AND RESPONSIBILITIES

- 3.1 Scope: This includes all maintenance areas and temporary construction sites.
- 3.2 Responsibilities:
 - 3.2.1 Maintenance personnel are responsible for proper containment of materials.
 - 3.2.2 Maintenance Managers or Assistant Managers are responsible for the oversight that all waste is placed in proper containers, proper labeling, properly disposed, and must track the amount of Hazardous Waste that is generated in their respected area.
 - 3.2.3 Maintenance Managers or Assistant Managers are responsible for proper training of personnel on waste procedures
 - 3.2.4 Maintenance personnel are responsible for proper spill cleanup materials.
 - 3.2.5 Maintenance Managers or Assistant Managers are responsible for choosing a waste hauler with a valid EPA ID

4.0 REQUIREMENTS



4.1 Waste Labeling

4.1.1 Responsibilities

- 4.1.1.1 Employees generating waste are responsible for proper container labeling, which involves proper Accumulation Start Date (where applicable) and proper name of contents.
- 4.1.1.2 Maintenance / Operations managers and/or assistant managers are responsible for proper waste labeling training for employees.
- 4.1.1.3 Maintenance / Operations managers and/or assistant managers are responsible for the oversight of proper labeling for all containers within their area of responsibility.

4.1.2 Monthly Maintenance Manager/Operations Manager requirements:

- 4.1.2.1 The Operation / Maintenance Managers (or a designated person in his/her stead) will visually spot-check all exterior drum and/or storage container locations within their respective areas of responsibility to ensure that proper labeling/identification is affixed to the drum or container in accordance with 40 CFR Parts 261-262 Resource Conservation and Recovery Act (RCRA) and the Monthly Facility Storm Water Inspection. **This includes all secondary/transfer containers that might be used with maintenance operations.**
- 4.1.2.2 Drums or containers found without labeling affixed or faded shall be re-labeled with the proper identification of its contents. **This includes all secondary/transfer containers that might be used with maintenance operations.**
- 4.1.2.3 Drums or containers of which the contents cannot be identified will be placed in an approved waste material storage location, and will be labeled:

<p><u>Non-hazardous Waste - Pending Analysis</u> Sample Required for Disposal (enter date placed in storage)</p>
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or, depending on suspected contents

<p><u>Hazardous Waste - Pending Analysis</u> Sample Required for Disposal (enter date placed in storage)</p>
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- 4.1.2.4 Results of any action taken will be recorded in the “Corrective and Preventative Actions” section of the Monthly Facility Storm Water Inspection form.



4.2 **Used Oil**

- 4.2.1 Oil collected from preventive or corrective maintenance is to be drained into a holding tank, drum, pan or oil collection stand. It shall then be either dumped, poured or pumped into a waste oil collection tank to await proper disposal by a qualified waste materials transporter.
- 4.2.2 **Storage containers must be labeled “Used Oil”.**

4.3 **Used Filters**

- 4.3.1 Filters collected from preventive or corrective maintenance are to be placed upside down on the filter drain stand and allowed to drain into the collecting tank. When the filters are fully drained they are to be placed in a designated filter recycling bin for proper disposal by a qualified waste materials transporter.
- 4.3.2 Oil collected during the filter draining process shall be dumped or poured into the used oil collection tank to await proper disposal by a qualified waste materials transporter.
- 4.3.3 Disposal shall be coordinated with a qualified waste materials transporter.

4.4 **Used Anti-Freeze**

- 4.4.1 Used anti-freeze shall be collected and dumped or poured into the used waste anti-freeze storage tank to await proper disposal by a qualified waste materials transporter.
- 4.4.2 Storage containers must be labeled “Used Anti-freeze”.
- 4.4.3 It is a Best Management Practice for Used anti-freeze waste storage not to exceed twelve (12) months from the time of the last collection, however this is not a regulation. Disposal shall be coordinated with a qualified waste materials transporter.

4.5 **Spray cans**

- 4.5.1 Spray cans shall be placed in a designated area by the spray can puncturing equipment. Cans will be punctured and then placed in a designated scrap metal container. Once the container is full, it will be designated for disposal.
- 4.5.2 Punctured spray can waste liquid storage is described in paragraph 4.6.5 of this procedure.

4.6 **Chemicals**

- 4.6.1 Pesticides, herbicides, cleaning chemicals, etc. are to be placed in the designated area, on containment in a covered area. A proper identification label and any warnings (if applicable) are to be clearly visible.
- 4.6.2 Containers that have had the product expended must be rinsed and then can be placed in an appropriate waste receptacle (unless the pesticide label requires other disposal methods).
- 4.6.3 Those containers that are found to be deteriorated and/or leaking shall be placed in an over pack container or drum to prevent additional spillage.
- 4.6.4 It is a best management practice for Chemical waste storage not to exceed ninety (90) days from the time of the first collected item, however this is not a regulation. Disposal shall be coordinated with a qualified waste materials transporter. The collective amount of waste generated cannot exceed the requirements of 4.14.1 of this procedure.

4.7 **Paints and Solvents**

- 4.7.1 Solvents used for painting are to be placed in a designated container for collection. It is a best management practice for Solvent waste storage not to exceed ninety (90) days from the time of the first collected item. Disposal shall be coordinated with a qualified waste materials transporter. The collective amount of waste generated cannot exceed the requirements of 4.14.1 of this procedure.
- 4.7.2 Solvents used for mechanical degreasing are to be placed in a designated container for collection. It is a best management practice for Solvent waste storage not to exceed ninety (90) days from the time of the first collected item. Disposal shall be coordinated with a qualified waste materials transporter.
- 4.7.3 Fully expended latex and alkyd-based paint cans may be disposed of in the scrap metal collection bin.
- 4.7.4 Latex and alkyd-based paint cans containing product and which are to be disposed of, are to be placed in a designated area for disposal by a qualified waste materials transporter. It is a best management practice for Storage not to exceed twelve (12) months.
- 4.7.5 Paints and degreasers collected from spray can puncturing are to be collected in a designated container for disposal. It is a best management practice for Paint and degreaser waste storage not to exceed twelve (12) months from the time of the first collected item. Disposal shall be coordinated with a qualified waste materials transporter.

4.8 **Tires and Rims**

- 4.7.1 Tires that have rims installed may be stored outside. Tire casings and rims must be stored under cover protected from rain.

4.7.2 Tire casings for disposal are to be placed in a designated area for pickup by the designated tire supplier for disposal.

4.7.3 Rims may be disposed of in the designated scrap metal bin.

4.8 **Used Spill Cleanup Materials**

4.8.1 Spill cleanup materials are to be placed in designated containment at each of the maintenance shops. Used oil-dry is to be drained of as much oil as possible before being disposed of.

4.9 **Scrap Metal**

4.9.1 Scrap metal is to be placed in the designated bin. Bin shall be placed under cover (if possible) to avoid the collection of storm water and to prevent storm water run-off. Collection is accomplished on an as required basis by a contracted scrap metal hauler.

4.10 **Used Lamps and Ballasts**

4.10.1 Facilities Maintenance handles all used fluorescent lamps; high-pressure sodium, mercury vapor, and metal halide lamps and transformer (magnetic) lamp ballasts. Used lamps and ballasts are stored at the facility maintenance shop at PMT.

4.10.2 Used fluorescent lamps, high-pressure sodium, mercury vapor, and metal halide lamps, and transformer (magnetic) lamp ballasts having oil or PCB oil, are to be stored in boxes or containers with the carton flaps closed to prevent breakage and/or spillage at the collection site.

4.10.3 Storage of fluorescent lamps in boxes must not exceed 12 months. The date that the first lamp enters the box is to be written on the outside of the box to ensure compliance of the 12 month storage regulation. This is the Accumulation Start Date (ASD).

4.10.4 Every effort shall be made to avoid breakage of lamps and tubes. Should a lamp inadvertently become broken immediately cleanup and place the broken lamps in a closed container and return it labeled "Broken Lamp" to facilities maintenance for disposal.

4.10.5 Disposal consists of contacting an approved waste transporter for removal and disposal of whole tubes or lamps.

4.10.6 Do not dispose of any lamp, fluorescent tube, or transformer (magnetic) lamp ballast having oil or PCB oil into a trash receptacle. Dry type (electronic) ballasts may be disposed of in the scrap metal collection bin.

4.10.7 All disposal records are to be stored on file for a minimum of 3 years



4.11 Batteries (Core & Non-Core Batteries)

4.11.1 Core Batteries

4.11.1.1 Core Batteries is referring to lead-acid batteries used on vehicles or cargo handling equipment.

4.11.1.2 All of the lead-acid batteries on The Port of Virginia Marine Terminals are collected for recycle, therefore are subject to the “lead-acid battery exemption,” and therefore do not need an accumulation start date applied to used lead-acid batteries.

4.11.1.3 Batteries are to be stored on secondary containment while waiting for pick-up.

4.11.2 Non-Core Batteries

4.11.2.1 Non-Core Batteries refers to any other type of battery than lead-acid batteries such as Alkaline, Lithium, UPS, NI (power tools), etc.

4.11.2.1.1 The Motorola Batteries that are used in the radios are turned into the Motorola Manager that is located onsite at NIT.

4.11.2.2 VIG

4.11.2.2.1 Used Non-Core Batteries are brought to the parts room for collection. Parts clerks are responsible for placing batteries in drums with proper Universal Waste Labels and accumulation start dates (ASD).

4.11.2.2.1.1 **Accumulation Start Date (ASD)** is the date when the first battery went into the drum.

4.11.2.2.2 Once drum(s) are full, parts clerk(s) will contact waste disposal contractor for pick-up and proper disposal.

4.11.2.2.3 Parts Clerks will keep copies of disposal manifests.

4.11.2.2.4 Parts Clerks will be responsible for conducting a monthly inspection to ensure drums are properly labeled and closed.

4.11.2.3 NIT

4.11.2.3.1 Used Non-Core batteries are collected on a pallet inside the Facilities Maintenance Office. Used non-core batteries are picked up by a certified waste hauler for disposal, this is coordinated by the facilities maintenance department.

4.11.2.3.2 Used Non-Core Batteries shall have a date marked on them once they are placed on the pallet and may not stay on the pallet longer than one year.

4.11.2.3.3 Disposal Records are kept by the Facilities Maintenance Department, Parts Department, and/or the O&M Administrator.

4.11.2.4 PMT & NNMT

4.11.2.4.1 Used Non-Core Batteries from these terminals are brought to either NIT or VIG for disposal.

4.12 Spill Pads (Excludes VIP and RMT)

4.12.1 Facilities Maintenance will ensure the spill pads are functioning properly (not damaged or leaking).

4.12.2 If a container is **ON** the spill pad, the valve for the pad must remain **CLOSED**.

4.12.2.1 The valve shall remain **CLOSED** until the material that was collected in the pad has been properly removed from the pad.

4.12.3 The valve to the pad shall remain **OPEN**, as long as the pad is not being used and there is no material inside the pad.

4.13 Thermostats (if applicable)

4.13.1 Used thermostats containing a mercury bulb shall be stored in a designated area to await proper disposal by an authorized waste disposal contractor. Storage shall not exceed ninety (90) days. The collective amount of waste generated cannot exceed the requirements of paragraph 4.14.1 of this procedure.

4.14 Selection of a Waste Hauler

4.14.1 Managers must approve all Waste Materials Transporters.

4.14.2 Waste Materials Transporters must have a valid EPA ID.

4.14.3 Periodically Managers should check the compliance status of the Waste Treatment Storage and Disposal Facility (TSDF) that the waste hauler ships the site's hazardous waste to. The EPA ID of the TSDF can be found on the Uniform Hazardous Waste Manifest. The EPA Compliance Site may be used as a method to check the EPA ID of the TSDF and the compliance status. (http://www.epa-echo.gov/echo/compliance_report_rcra.html)

4.15 Hazardous Waste Tracking



- 4.15.1 The Environmental Department shall check disposal records, as needed, to ensure that the generator status of Conditionally Exempt Small Quantity Generator (CESQG) is accurate.
- 4.15.2 To maintain status as a CESQG less than 100 kg/month (221 lb/month) of hazardous waste may be generated or less than 1 kg/month (2.21 lb/month) of acutely hazardous waste may be generated.

6 CONSEQUENCES OF DEVIATION FROM PROCEDURE

Deviations from this procedure could result in the improper disposal of universal, hazardous or oily wastes or in the improper record of disposal of universal or hazardous wastes. Both the improper record of disposal or improper disposal of wastes could result in fines or notices of violation from the Virginia Department of the Environment and/or could result in harm to individuals or the environment.

7 ATTACHMENTS (Controlled Documents)

Not Applicable

8 RECORDS FOR MONITORING AND MEASUREMENT

7.1 Non-hazardous waste disposal receipts and purchase orders.

7.2 Hazardous waste material manifests, receipts and purchase orders.

9 DEFINITIONS

- a. Hazardous Waste Materials Transporter - A person or company engaged in the off-site transportation of universal wastes by air, rail, highway or water. A hazardous waste transporter must have a valid EPA ID.
- b. Hazardous Waste – A solid waste as defined in 40 CFR 261.4 is a hazardous waste if it is not excluded under 40 CFR 261.(4)b and if it has any of the characteristic of a hazardous wastes (e.g. ignitability, corrosively, reactivity, toxicity) and/or if it is a listed hazardous waste. A hazardous waste determination must be made on all wastes that may be suspected to be a hazardous waste.
- c. Non-Hazardous Waste – A waste that does not meet the requirements to be a hazardous waste.
- d. Universal Waste – includes any of the following hazardous wastes that are subject to the universal waste requirements of 40 CFR 273: batteries, pesticides, thermostats, and lamps.
- e. Universal Waste Transporter – A person or company engaged in the off-site transportation of universal wastes by air, rail, highway or water. For NIT, a transporter must have a valid EPA ID. Transporter requirements are found at 40 CFR 273 Subpart D.



- f. Used Oil - any petroleum-based or synthetic that has been used. During normal use, impurities such as dirt, metal scrapings, water or chemicals, can get mixed in with the oil, so that in time, the oil no longer performs well.

10 REVISION HISTORY

- a. Effective Date: 11/10/2009
- b. Latest Revision Date: 3/19/19 – updated used bulbs & waste tracking procedure. 12/12/2018 – added fluorescent bulb procedure 2/16/17 – updated requirements for lead-acid batteries. 11/10/16 – merged VIP and RMT. 11/18/14 – updated Accumulation Start Date Regulations for CESQG.. 4/15/14 – added spill pad procedure. 11/13/13 – updated employee titles 4/17/13 – updated to send all manifests to O&M administrator. 7/11/12 – combined SOP's for all terminals to one SOP & added waste labeling requirements. 11/10/2009
- c. Approval: Scott Whitehurst, Director, Environmental Policy and Compliance
- d. Last Reviewed: 3/19/19
- e. Reviewer: Billy Goodson, Environmental Compliance Specialist