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## **Standard Operating Procedure – Hazardous Waste Inspections**

### **1. Purpose**

The purpose of this SOP is to define how to properly inspect Hazardous Waste storage at EES Coke Battery LLC.

### **2. Scope**

This document is intended to provide a description regarding how to inspect Hazardous Waste storage at EES Coke Battery LLC and document the results.

### **3. Responsibilities**

EES Coke Environmental staff are responsible for implementing this procedure, however, Sidock field personnel may perform the field tasks as needed or requested. The Sidock Project Manager, or their designee, will implement Sections 7.8 and 7.9 when Sidock field personnel perform the inspections.

### **4. PPE Requirements**

The following PPE is required for personnel responsible for implementing this procedure:


1. Standard Battery and Byproducts plant PPE (leather gloves; FR clothing; hard hat; safety glasses; radio; metatarsal safety boots; hearing protection; CO detector; ½- face respirator on person or in place in respirator required areas).

### **5. Communication**

1. Have radio tuned to the correct channel depending on location within the facility.
2. Field Personnel shall sign into the logbook at CR2 before entering the Byproducts plant.
3. If any problems are noted, contact the EES Coke environmental staff, appropriate area supervisor (Battery Foreman or Byproducts supervisor) and Sidock Environmental personnel.


### **6. Safety Requirements**

1. Be aware of all surroundings while performing Hazardous Waste inspections.


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## **7. Procedure**


1. Field personnel shall inspect all Hazardous Waste satellite and 90-day storage areas specified on EES Coke Battery LLC's Waste Weekly Inspection Form every seven days. To make sure to comply with the every seven day requirement, the inspection should take place on the same day each week. The weekly inspections shall include:
  - For satellite accumulation areas:
    - A check that containers are closed and in good condition with no dents or corrosion.
    - A check that containers are 55 gallons or smaller.
    - A check that containers are compatible with the waste being stored.
    - A check of hazardous waste labels on the containers to determine if all of the following information is included:
      - Accumulation date
      - Description of the waste being stored
      - Waste code
    - A check for material spills, leaks or staining on containers.
    - A check for material spills, leaks or staining around the secondary containment area, if applicable.
    - A check of containment areas for water (1/2"-1" accumulation) or other liquids.
    - A check of containment areas for a visible sheen.
    - A check of containers to determine whether they have been at the satellite accumulation area for more than three (3) days after becoming full.
    - Aerosol Cans are considered Universal Waste.
  - For 90-day storage areas:
    - A check that containers are closed and in good condition with no dents or corrosion.
    - A check that hazardous waste containers have not been in storage more than 90 days from the accumulation date
    - Universal waste can be stored up to one calendar year from the accumulation start date
    - A check for material spills, leaks or staining on the containers and the vicinity of the accumulation point.
    - A check for material spills, leaks or staining around the secondary containment area, if applicable.
    - A check of labels on the containers, to determine if all of the following information is included:
      - Accumulation date
      - Description of the waste being stored
    - Waste code(s) A check that empty drums are labeled "Empty Drum".
    - A check that obsolete or old labels have been removed or defaced on drums and containers.

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- A check that adequate aisle space (i.e., at least three (3) feet) is provided between rows of containers to facilitate viewing of labels.
  - A check of containment areas for water or other liquids.
  - A check that containers are compatible with the waste being stored.
  - A check for DOT labels on waste containers.
    - Field personnel may affix DOT labels to waste containers under the guidance of EES Coke Battery LLC's Environmental Staff's direction.
2. The following conditions are considered "**Not OK**" for satellite accumulation areas:
- Open containers.
  - Containers that are not in good condition, dented or corroded.
  - Containers with capacities greater than 55 gallons.
  - Containers made of materials that are incompatible with the waste being stored.
  - Unlabeled containers.
  - Recycled containers (example – SIF material) do not need to be labeled or listed in the inspection.
  - Container labels missing any of the following information:
    - Accumulation date.
    - Description of the waste being stored.
    - Waste code
      - Empty containers only need a label, they do not need to be dated or have a description.
  - Evidence of material spills, leaks or staining on containers.
  - Evidence of material spills, leaks or staining around the secondary containment area, if applicable.
  - The presence of water or other liquid in a containment area.
    - Only if the water or other liquid could cause the containment or secondary containment to not be sufficient to hold the contents of the largest container if it were to fail.
  - A visible sheen in a containment area.
  - Containers remaining at satellite accumulation areas for more than three (3) days after becoming full.
3. The following conditions are considered "**Not OK**" for 90-day storage areas:
- Open containers.
  - Containers that are not in good condition, dented or corroded.
  - Evidence of material spills, leaks or staining on containers.
  - Evidence of material spills, leaks or staining around the secondary containment area.
  - Unlabeled containers.
  - Container labels missing any of the following information:
    - Accumulation date.
    - Description of the waste being stored.
    - Waste code(s)

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- Empty containers only need a label, they do not need to be dated or have a description.
  - Empty drums that are not labeled "Empty Drum".
  - Drums and containers with obsolete or old labels have not been removed or defaced.
  - Inadequate aisle space between containers which would not facilitate viewing of labels.
  - The presence of water or other liquid in a containment area.
    - Only if the water or other liquid could cause the containment or secondary containment to not be sufficient to hold the contents of the largest container if it were to fail.
  - Presence of Hazardous Waste containers at the 90-day storage area for more than 90 days.
4. Field personnel shall document the following on the EES Coke Battery LLC Waste Weekly Inspection Form:
- Date of inspection.
  - Time of inspection.
  - Retain Until Date - (i.e., 5 years from the date of the inspection).
  - Inspector's Name.
  - Inspector's Signature.
  - Whether each satellite accumulation area is OK or Not OK for the following:
    - Containers are properly closed and in good condition. (No dents or corrosion)
    - Containers are 55 gallons or smaller and compatible with waste stored.
    - Labels on containers include accumulation dates, waste description and waste codes.
      - Empty containers do not need to be labeled with a date or description.
      - Recycled materials do not need to be labeled or recorded.
    - Spills, leaks or staining on containers or around the secondary containment area.
    - Water or other liquids in the containment area and visible sheen.
    - Only if the water or other liquid could cause the containment or secondary containment to not be sufficient to hold the contents of the largest container if it were to fail.
    - Full containers are moved to the 90-day storage area within 3 days.
  - Whether each 90-day storage area is OK or Not OK for the following:
    - Containers are properly closed and in good condition. (No dents or corrosion)
    - Spills, leaks or staining on containers or around the secondary containment area.
    - Labels on containers include accumulation dates, waste description and waste codes
      - Empty containers do not need to be labeled with a date or description.
      - Recycled materials do not need to be labeled or recorded.
    - Empty drums are labeled "Empty Drum".
    - Water or other liquids in the containment area

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- Only if the water or other liquid could cause the containment to fail to contain the largest tank or drum.
- Containers of hazardous waste (not including universal wastes) stored less than 90 days.
- Describe any problems or conditions found during inspection in the "Comments" column of the form).
- Describe any actions taken in response to issues identified during the inspections, including the date of mitigation, in the "Action Taken" column of the form.
- The materials and containers present at each satellite accumulation and 90-day storage area, by completing the "Container Log" section of the form, including the following information:
  - A description of waste (e.g., used aerosol cans, used batteries, coal tar and debris, fluorescent lamps, etc.) in the "Waste Description" column.
  - The number of containers present of each container type in the "# Containers" column.
  - The waste codes (e.g., K087, K141, D001, etc.) in the "Waste Code" column.
  - The accumulation start dates for each container in the "Dates" column.
- 5. Field personnel shall notify the EES Coke Environmental Personnel, appropriate EES Coke area supervisor (Battery Foreman or Byproducts supervisor) and Sidock Environmental personnel as soon as the area is inspected if any issues are noted during the waste inspections.
  - a. Field Personnel may be told by EES Coke personnel to make minor corrective actions (Labeling), and to record the corrective action once it is completed.
  - b. Field Personnel will check the status of any open corrective action the Friday after the inspection.
- 6. Field personnel shall review the completed EES Coke Battery LLC Waste Weekly Inspection forms to confirm that the information specified in step 4 is documented.
- 7. The completed EES Coke Battery LLC Waste Weekly Inspection forms shall be included in the weekly inspection report and distributed in accordance with the requirements for the weekly inspection reports specified in ENV-EES-18.
- 8. The Sidock Project Manager, or their designee, shall maintain a summary of hazardous waste container data located at the 90-day storage area at EES Coke and update the data weekly, based on the weekly waste inspection reports. The summary shall include the dates on the hazardous waste containers, the number of containers with each date and the contents of the containers. The summary shall also calculate the days remaining before the 90-day storage limitation expires for each hazardous waste container.
- 9. The Sidock Project Manager, or their designee, shall provide a summary of the hazardous waste container tracking data specified in Section 7.8 to EES Coke Environmental Personnel on a weekly basis.

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## **8. References**

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1. EES Coke Battery LLC RCRA Hazardous Waste Contingency Plan.

## **9. Attachments**

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- EES Coke Battery LLC Waste Weekly Inspection – Form (E)
- Hazardous Waste Location Diagram (from RCRA Hazardous Waste Contingency Plan)

<b>Summary of changes</b>			
<b>Review</b>	<b>Date</b>	<b>Changes Description</b>	<b>Changed by</b>
0	7/20/2021	Original procedure	R. Kimble
1	9/03/2021	Added Sections 7.8 and 7.9	R. Kimble
2			
3			
4			
5			



# EES Coke Battery L.L.C.

## Waste Weekly Inspection - (F)

#1 Shop (Satellite Accumulation)

<b>General Inspection Information:</b>		(Retain for 5 years)	
Inspection Date:		Retain Until Date:	
Inspection Time:		Inspector Name:	
<b>Report any items with Not OK status to appropriate supervisor.</b>			
Item	Status	Comments (Describe any problems or conditions found during inspection)	Action Taken (include name of supervisor contacted, how they were contacted, and time of contact)
<b>#1 Shop (Satellite Accumulation)</b>			
Containers are properly closed and in good condition. (No dents or corrosion)	OK	Not OK	
Containers are 55 gallons or smaller and compatible with waste stored.	OK	Not OK	
Labels on containers, including accumulation dates, waste description and codes.	OK	Not OK	
No spills, leaks or staining on containers or around the secondary containment area.	OK	Not OK	
No water or other liquids in the containment area and no visible sheen.	OK	Not OK	
Identify that full Containers of Hazardous Waste are moved to the 90 day storage area within 3 days.	OK	Not OK	
<b>Container Log:</b>			
Waste Description	# Containers	Waste Codes	Dates
<b>Follow up inspection date and time:</b>		<b>Were problem(s) mitigated?</b>	<b>Action Taken</b> (If problem not mitigated)
Inspector's Name:			
Inspector's Signature:			



**EES Coke Battery L.L.C.**

**Waste Weekly Inspection - (F)**

## #2 Shop (Satellite Accumulation)

<b>General Inspection Information:</b>				(Retain for 5 years)			
Inspection Date:				Retain Until Date:			
Inspection Time:				Inspector Name:			
<b>Report any items with Not OK status to appropriate supervisor.</b>		<b>INSPECTOR SIGNATURE:</b>					
<b>Item</b>	<b>Status</b>	<b>Comments</b> (Describe any problems or conditions found during inspection)		<b>Action Taken</b> (include name of supervisor contacted, how they were contacted, and time of contact)			
<b>#2 Shop (Satellite Accumulation)</b>							
Containers are properly closed and in good condition. (No dents or corrosion)	OK						
Containers are 55 gallons or smaller and compatible with waste stored.	OK						
Labels on containers, including accumulation dates, waste description and codes.	OK						
No spills, leaks or staining on containers or around the secondary containment area.	OK						
No water or other liquids in the containment area and no visible sheen	OK						
Identify that full Containers of Hazardous Waste are moved to the 90 day storage area within 3 days.	OK						
<b>Container Log:</b>							
<b>Waste Description</b>	<b># Containers</b>	<b>Waste Codes</b>		<b>Dates</b>			
<b>Follow up inspection date and time:</b>		<b>Were problem(s) mitigated?</b>		<b>Action Taken</b> (If problem not mitigated)			
Inspector's Name:							
Inspector's Signature:							

# EES Coke Battery L.L.C.

## Waste Weekly Inspection - (F)

Battery (Satellite Accumulation)

<b>General Inspection Information:</b>		(Retain for 5 years)	
Inspection Date:		Retain Until Date:	
Inspection Time:		Inspector Name:	
<b>Report any items with Not OK status to appropriate supervisor.</b>		<b>INSPECTOR SIGNATURE:</b>	
Item	Status	Comments (Describe any problems or conditions found during inspection)	Action Taken (include name of supervisor contacted, how they were contacted, and time of contact)
<b>Battery (Satellite Accumulation)</b>			
Containers are properly closed and in good condition. (No dents or corrosion)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Containers are 55 gallons or smaller and compatible with waste stored.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Labels on containers, including accumulation dates, waste description and codes.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No spills, leaks or staining on containers or around the secondary containment area.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No water or other liquids in the containment area and no visible sheen.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Identify that full Containers of Hazardous Waste are moved to the 90 day storage area within 3 days.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Container Log:</b>			
Waste Description	# Containers	Waste Codes	Dates
<b>Follow up inspection date and time:</b>		Were problem(s) mitigated?	Action Taken (If problem not mitigated)
Inspector's Name:			
Inspector's Signature:			

# EES Coke Battery L.L.C.

## Waste Weekly Inspection - (F)

Bio Plant (Satellite Accumulation)

<b>General Inspection Information:</b>		(Retain for 5 years)	
Inspection Date:		Retain Until Date:	
Inspection Time:		Inspector Name:	
<b>Report any items with Not OK status to appropriate supervisor.</b>		<b>INSPECTOR SIGNATURE:</b>	
Item	Status	Comments (Describe any problems or conditions found during inspection)	Action Taken (include name of supervisor contacted, how they were contacted, and time of contact)
<b>Bio Plant (Satellite Accumulation)</b>			
Containers are properly closed and in good condition. (No dents or corrosion)	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
Containers are 55 gallons or smaller and compatible with waste stored.	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
Labels on containers, including accumulation dates, waste description and codes.	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
No spills, leaks or staining on containers or around the secondary containment area.	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
No water or other liquids in the containment area and no visible sheen.	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
Identify that full Containers of Hazardous Waste are moved to the 90 day storage area within 3 days.	<input type="checkbox"/> OK <input type="checkbox"/> Not OK		
<b>Container Log:</b>			
Waste Description	# Containers	Waste Codes	Dates
<b>Follow up inspection date and time:</b>		<b>Were problem(s) mitigated?</b>	<b>Action Taken</b> (If problem not mitigated)
Inspector's Name:			
Inspector's Signature:			





