

DEPARTMENT OF THE ARMY
 DEVENS RESERVE FORCES TRAINING AREA
 Devens, Massachusetts 01434-4424
 24 February 2006

Environmental Protection and Enhancement
SATELLITE GENERATION POINT STANDARD OPERATING PROCEDURE

HISTORY. This is the initial publication of this procedure under the Devens Reserve Forces Training Area (Devens RFTA).

SUMMARY. This procedure covers the management of satellite generation points at Devens RFTA.

APPLICABILITY. This procedure applies to all Devens RFTA directorates, staff activities, military and civilian organizations, government agencies, contractors, and individuals training, doing business, conducting research, or otherwise using Devens RTFA facilities. It is both informative and directive in nature.

SUGGESTED IMPROVEMENTS. The proponent of this memorandum is the Directorate of Public Works (DPW) Environmental Division. Users are invited to send comments and suggested improvements on Department of the Army (DA) Form 2028 (Recommended Changes to Publications and Blank Forms) to Commander, Devens RFTA, ATTN: IMNE-DEV-PWE, Devens, MA 01434-4424.

| CONTENTS | | | | |
|----------|---|--|------|------|
| CHAPTER | TITLE | | PARA | PAGE |
| 1 | INTRODUCTION | | | 3 |
| | Purpose | | 1-1 | 3 |
| | Applicability | | 1-2 | 3 |
| | Scope | | 1-3 | 3 |
| 2 | SPECIAL TERMS | | | 3 |
| | Terms | | 2-1 | 3 |
| 3 | OVERVIEW OF SATELLITE GENERATION POINTS | | | 3 |
| | Summary of SGP Requirements | | 3-1 | 3 |

| CHAPTER | TITLE | PARA | PAGE |
|-----------------|---------------------------------------|-------------|-------------|
| 4 | SETUP FOR SATELLITE GENERATION POINTS | | 4 |
| | Setup Requirements | 4-1 | 4 |
| 5 | OPERATIONAL STANDARDS | | 5 |
| 6 | INSPECTIONS | | 5 |
| APPENDIX | | | |
| A | SPILL NOTIFICATION AND RESPONSE | | 7 |
| | Devens RFTA Spill Quick Reference | A-1 | 7 |

CHAPTER 1. INTRODUCTION

1-1. Purpose. The purpose of this regulation is to discuss the regulatory requirements that comply with Army, state and federal satellite generation points.

1-2. Applicability. Intended users of this guidance are the managers and operators of satellite generation points located on the Devens RFTA.

1-3. Scope. Implementing regulations for this procedure are found in Title 40 of the Code of Federal Regulations (CFR) Part 262, and Title 310 of the Code of Massachusetts Regulation (CMR), Chapter 30.

CHAPTER 2. SPECIAL TERMS

2-1. Terms. The following terms are used in this standard operating procedure.

a. Generator - The person having leadership capacity for an organization or activity whose operations produce waste oil or hazardous waste.

b. Hazardous Waste - A solid waste that is either listed at 310 CMR 30.131 through 30.136 as a hazardous waste, or is characterized as hazardous for ignitability, corrosivity, reactivity, or toxicity, as defined at 310 CMR 30.120 through 30.125B.

c. Regulated Waste Site - A regulated waste site is the location for collecting or staging hazardous waste.

d. Satellite Generation Point (SGP) - The satellite generation point is the point at which hazardous waste is first generated, with no more than one container for each waste stream generated.

CHAPTER 3. OVERVIEW OF SATELLITE GENERATION POINTS

3-1. Summary of SGP Requirements. Federal and state regulations require that the generation of hazardous waste must be properly managed. Accumulation of such waste will normally require obtaining a storage permit. However, in its hazardous waste rules the Massachusetts Department of Environmental Protection (MA DEP) allows the following exception to the requirement to obtain a storage permit in order to accumulate hazardous wastes.

a. A generator may, for any length of time, without being licensed or having interim status, accumulate hazardous waste or waste oil in containers at or near each specific point of generation where wastes initially accumulate, provided that all of the following requirements are met:

(1) The wastes must be generated as a result of a process occurring at the specific point of generation where the wastes are initially accumulated.

(2) Each such specific point of generation where wastes initially accumulate, and each satellite accumulation container, shall be under the control of the individual directly responsible for the process resulting in the generation of such wastes.

(3) For each specific point of generation, only one container per waste stream may be used at any one time. The maximum capacity of said container shall be as follows:

(a) Fifty-five gallons if the hazardous waste or waste oil being accumulated is non-acutely hazardous waste.

(b) One quart if the hazardous waste being accumulated is a listed acutely hazardous waste.

(c) Within three days of the time a generator fills a container or accumulates a quantity of hazardous waste or waste oil in excess of the applicable limit, the generator shall remove the container from the specific point of generation. The container can be moved to a hazardous waste accumulation area or shipped off for proper disposal.

CHAPTER 4. SETUP FOR SATELLITE GENERATION POINTS

4-1. Setup Requirements. Each satellite generation point must have proper signs, labeling, spill response materials, fire-fighting equipment, and not stored near incompatible materials as discussed below.

a. Signs.

(1) The area in which a satellite generation point is located should have a sign which presents the words: "CAUTION: SATELLITE GENERATION POINT, AUTHORIZED PERSONNEL ONLY" in capital letters at least one-inch high.

(2) An emergency response poster should be in the area, which lists the telephone numbers of people/organizations to call in case of a spill or emergency. At a minimum, the sign should include the information in the Devens RFTA Spill Quick Reference in Appendix A.

(3) A sign, which designates the hazard class of each type of hazardous waste, kept at the satellite generation point.

b. Spill response materials and fire extinguishers.

(1) Spill response materials must be available. At a minimum, the materials should include an empty 55-gallon overpack drum, push broom and flat head shovel, loose absorbent, absorbent pads, and rags.

(2) Fire extinguishers should be readily available near the satellite generation points.

c. Labeling.

(1) Each tank or container in which hazardous waste is being accumulated shall be clearly marked and labeled throughout the period of accumulation. Each tank or container shall be marked and labeled with the following:

(a) The words "Hazardous Waste",

(b) The hazardous waste(s) identified in words (e.g., acetone, toluene), and

(c) The type of hazard associated with the waste(s) indicated in words (e.g., ignitable, toxic, dangerous when wet).

(2) Once the container becomes full enter the date on the container. Containers that are not full should **not be dated**. **The full date is not the first date of accumulation**. Once a container has been dated do not change the date.

d. Incompatibility. A container holding a hazardous waste that is incompatible with any waste or other material stored nearby in other containers shall be separated from the other waste or protected from it by means of a dike, berm, wall or other device.

CHAPTER 5. OPERATIONAL STANDARDS

a. The following operational standards should be adhered to when operating a satellite generation point.

(1) All containers at the satellite generation point must be closed at all times, except when adding to or removing from the container. An open container is a violation of state and federal regulations.

(2) If secondary containment is required for the satellite generation point, before discharging any rainwater from the containment be sure and remove any oil sheens with absorbent pads. The non-contaminated water can then be discharged to the ground.

(3) Only one container for each type of hazardous waste is allowed at the satellite generation point at any one time. Full containers must be moved from the satellite generation point within 72 hours. Because of the single container limit, a new container may not be placed at the satellite generation point until the full one is removed.

CHAPTER 6. INSPECTIONS

a. The generator must inspect all regulated waste sites weekly. During the inspection, look for evidence of container leaks, dents, bulges, punctures, corrosion or other deterioration

and opened or unsecured lids or bungs. Also, check each container for proper markings and labeling.

b. Inspections will also include checking spill response and emergency equipment to ensure in proper working conditions and the quality is still good.

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Devens Web Site

A, B, C

APPENDIX A. SPILL NOTIFICATION AND RESPONSE

A-1. DEVENS RESERVE FORCES TRAINING AREA SPILL QUICK REFERENCE

ONLY THE INCIDENT ON-SCENE COORDINATOR OR DPW ENVIRONMENTAL DIVISION WILL MAKE EXTERNAL NOTIFICATIONS OF SPILLS/RELEASES.

| POINTS OF CONTACT | TELEPHONE NUMBERS |
|--|--|
| Incident On-Scene Coordinator (IOSC) – DPW Maintenance Branch Chief | 978-796-3778 978-580-0061 |
| Range Control | 978-796-2723 978-796-2155 |
| DoD Police | 978-796-3333 978-796-3221 |
| Ambulance/Fire Department | 9-911 |
| DPW Environmental Division | 978-796-3078 978-796-2747 978-796-3665 |
| Safety Office | 978-796-2159 978-796-2441 978-360-2553 978-796-2534 (Range Control) |
| DPW Director | 978-796-3665 978-857-2698 |

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.
- Contact the Incident On-Scene Coordinator (IOSC) ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- The IOSC will verify if responsible party or contractor should cleanup the spill/release.
- Contact the DPW Environmental Division. If no answer, contact Safety Office.
- DPW Director shall be contacted **only** for information purpose or if the DPW Environmental Division or the Safety Office cannot be reached.

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES AT SOUTH POST

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.

- Contact Range Control ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- Range Control will contact the Incident On-Scene Coordinator (IOSC) to notify of the spill and verify if responsible party or contractor should cleanup the spill/release.
- IOSC will contact the DPW Environmental Division. If no answer, contact Safety Office.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.

OILS & HAZARDOUS MATERIALS SPILLS/RELEASES DURING OFF-DUTY HOURS

- If it can be done safely, contain, identify, and quantify the spill/release.
- If it **cannot** be done safely, relocate to a safe area.
- If spill/release is located at South Post, follow above steps.
- Otherwise, contact the DoD Police ASAP, providing
 - Identity and quantity of what was released,
 - Location of the spill/release, and
 - What was it spilled on (earth, water, or impervious surface)
- The DoD Police will contact the Incident On-Scene Coordinator (IOSC) and DPW Environmental Division.
- The IOSC will verify if responsible party or contractor should cleanup the spill/release.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.

MEDICAL EMERGENCIES

- If there is an injury or medical emergency, call for an ambulance.
- If emergency is located at South Post, contact Range Control ASAP.
- Otherwise, contact the DoD Police ASAP.
- If environmental-related, contact the Incident On-Scene Coordinator and the DPW Environmental Division.
- DPW Director shall be contacted **only** for information purposes or if the DPW Environmental Division or the Safety Office cannot be reached.