| Authored By: John Long Doc Custodian: | Blanchard Refining Company LLC Galveston Bay Refinery | Doc No.: REW-000011-GB Rev No: 0 |
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| Environmental Supervisor Approved By: Eric Kaysen | ENV-28 Aerosol Container Management | Refinery Safe Work Procedure |
| Date Approved: 7/26/2021 | Next Review Date: 8/31/2026 | Effective Date: 8/20/2021 |

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1.0 Purpose

The purpose of this procedure is to define the requirements for the management of discarded aerosol containers (known as aerosol cans) used throughout the Refinery, including operating units, laboratory, and maintenance and infrastructure areas. Discarded partially empty or malfunctioned aerosol cans are regulated by The Resource Conservation and Recovery Act (RCRA). The Environmental Protection Agency (EPA) and Texas Commission on Environmental Quality (TCEQ) administer and enforce the requirements of RCRA by requiring generators of discarded partially empty or malfunctioned aerosol cans to manage them as hazardous waste.

2.0 Scope

This procedure applies to employees and contractors in all Refinery operating areas, including associated docks, laboratory, storage, and maintenance and contractor facilities.

3.0 Procedure

3.1 Roles and Responsibilities

3.1.1 Unit/Area

- 3.1.1.1 Each unit/area is responsible for the collection and management of waste aerosol cans generated within the area.
- 3.1.1.2 Each unit/area is responsible for maintaining signs and labels and complying with the requirements outlined in this procedure.
- 3.1.1.3 Each unit/area is responsible for notifying the Environmental Department contact when the aerosol can collection containers are full and require pick up.

3.1.2 Environmental Department

- 3.1.2.1 The Environmental Department is responsible for coordinating the movement of empty cans to a designated storage area and also preparing the drums for puncturing or offsite shipment.
- 3.1.2.2 The Environmental Department will manage the aerosol cans at a 90-day waste management unit.
- 3.1.2.3 The Environmental Department will manage the aerosol can puncturing on discarded aerosol cans. Aerosol can puncture activity is limited to 40 aerosol cans per day (24-hour period) at GBR and can only be conducted by a 40-hour HAZWOPER trained waste technician inside. Aerosol can puncture will be tracked a Aerosol Can Puncture Log.
- 3.1.2.4 The Environmental Department will manage the liquids from aerosol cans as a waste and the empty cans will be placed into a recycle metal bin.

3.1.3 Waste Technician

3.1.3.1 The waste technician will maintain the tracking of the punctured cans.

3.2 General Management Requirements

3.2.1 All discarded aerosol containers shall be managed in drums in satellite accumulation areas within production units/shops. The drum is required to be labeled with a "HAZARDOUS WASTE" label, and the words "Aerosol cans" used for the common waste name as soon as waste begins to enter the drum. "Aerosol Cans" labels may be obtained from the waste group. Along with the other labels, a "Flammable Gas" warning sign will

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- be placed on the drum. See Visual Standards guidance or contact the waste group at the number below for assistance.
- 3.2.2 Up to 55 gallons can be stored near the point of generation. Once the drum is full, the drum shall be dated, and the Environmental Department shall be contacted as soon as possible.

3.3 Reference Information

- 3.3.1 Environmental Department Waste contact phone number: (409) 771-2256
- 3.3.2 The Environmental department shall coordinate the transfer of the full drum to the designated drum container storage areas within 3 days.

4.0 Definitions

4.1 <u>Satellite Accumulation Area (SAA)</u> – A satellite accumulation area is an **area at or near any point of generation where hazardous waste initially accumulates** and that is under the control of the operator of the process generating the waste. This location is for temporary storage of aerosol cans

5.0 References

None

6.0 Attachments

6.1 Attachment A: Aerosol Can Puncture Log

7.0 Revision History

| Revision Number | Description of Change | Written by | Approved by | Revision Date | Effective Date |
|--------------------|--|------------|--------------|------------------|-------------------|
| 0 | Original Issue. New integrated site procedure replaces GBR-HESS-ENV-28, REW-N151-WAST-TC and REW-N151-WAST-TC under MOC 93391. | J. E. Long | E. R. Kaysen | 7/26/2021 | 8/20/2021 |

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Marathon – Galveston Bay Refinery Aerosol Cans Puncture Log

| Date | Responsible Person | Start Number | End Number | Cans punctured? (40 maximum per day) |
|------|--------------------|-----------------|---------------|--------------------------------------|
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