

Marathon Petroleum Company - Galveston Bay Refinery	Discarded Mercury Instruments Management		
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1.0 Purpose

The purpose of this procedure is to define the requirements for managing discarded or obsolete mercury containing barometers, switches, thermometers and any other mercury instrumentation generated at the Galveston Bay Refinery. Mercury containing instrumentation shall be managed in compliance with the Universal Waste Regulations. The Resource Conservation and Recovery Act (RCRA) regulates the storage, transportation and disposal of universal waste. The Texas Commission on Environmental Quality (TCEQ) administers and enforces the RCRA regulations in Texas.

2.0 Scope

This procedure applies to the management of mercury containing instrumentation generated in the Galveston Bay Refinery, including associated, docks, maintenance and contractor facilities.

3.0 Procedure

3.1 Roles and Responsibilities

- 3.1.1 The Instrument & Electrical (I&E) Department, BP Maintenance Supervisor, and other designated employees and contractors involved in the maintenance and upgrades of instruments are responsible for following the requirements outlined in this procedure. This includes alerting the Security Operation Center (SOC) when instrumentation fails and there is a mercury release.
- 3.1.2 The Environmental Department is responsible for working with I&E, GBR Maintenance Supervisor, employees and contractors to coordinate the transfer of mercury containing instruments to the proper universal waste management areas and to coordinate the pickup, transportation and disposal of all universal waste to offsite disposal and recycling facilities.

3.2 General Management Requirements

Mercury containing instrumentation eligible for universal waste management includes barometers, switches, thermometers and any other instrumentation with mercury as a component. The universal waste regulations limit storage of discarded mercury containing instrumentation to one year.

3.2.1 Collection and Storage

- 3.2.1.1 Discarded mercury instruments shall be taken by the GBR Maintenance Supervisor within 10 days of removal to the designated universal waste storage buildings located in the Refinery (Attachments B). The Universal Waste Storage area is located on the west end of Warehouse 6 (Waste Management Unit 044), commonly called the Quonset Hut.
- 3.2.1.2 The instruments shall be placed in the pre-labeled universal waste drum marked for "mercury/bulbs" (mercury shall be underlined). Close the lid and secure when done. **Do not add to drums marked for mercury vapor/High Intensity Discharge (HID) bulbs (bulbs shall be underlined), these are separate wastes.**
- 3.2.1.3 If the appropriate labeled container is full or if there is not one available for use contact the Environmental Department immediately at (409) 771-2256 and a new drum shall be labeled and placed in the storage area.
- 3.2.1.4 If free elemental mercury needs to be removed from instruments, it shall be treated as hazardous waste (only remove for safety reasons or to prevent or stop an instrument leak). Contact the Environmental Department for

assistance at (409) 771-2256.

3.3 Spill Cleanup and Response

Report any spills of mercury to the Security Operations Center (SOC) immediately at extension 21762 or 21765. Report mercury spills occurring outside the plant at (409) 945-1762 or (409) 945-1765. The SOC shall notify the Environmental Department. Spill cleanup shall only be performed by trained HAZMAT personnel.

3.4 Compliance Management System

GBR's Environmental Department Waste Team is responsible and accountable for program compliance and the oversight of the contract personnel to accomplish these goals. GBR's Environmental Department Waste Team is responsible to oversee activities to establish regulatory applicability and develop a compliance matrix with the Compliance Management System (CTM). The tracking device that Galveston Bay Refinery uses to track on site compliance is the task management system. The following tasks are assigned to responsible parties and tracked:

- Annual review and/or update of this procedure. Applicable Waste Team SMEs have this assignment.
- Annual training is assigned to appropriate GBR personnel through CBT and contractors through the safety council.

4.0 Definitions

None

5.0 References

None

6.0 Attachments

6.1 Attachment A – Container Labels Ordering Information

6.2 Attachment B – Map of Refinery Universal Waste Storage Area

7.0 Revision History

Revision Number	Description of Change	Written by	Approved by	Revision Date	Effective Date
0	Original Issue.	M.K. Alberts	K.M. Casey S.W. Dio	15-Aug-08	15-Aug-08
1	Review by Environmental Team. Administrative updates. Added Compliance Management System section. Eliminated BP Job Representative references per MOC M2010923-001.	M.K. Alberts	M.J. Berlinger O.O. Niederhofer	12-Jan-11	12-Jan-11
2	Review by Environmental Team. Removed Chemical Plant references throughout document.	M.K. Alberts	M.J. Berlinger	11-Oct-12	11-Oct-12

3	Reformatted as MPC GBR Procedure	M.K. Alberts	L. D. Mazur	30-Sep-14	30-Sep-14
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Attachment A
Container Labels Ordering Information

Galveston Bay Refinery Main Warehouse – (409) 945-1628

Stock item number:

90216328 - Blue universal waste

UNIVERSAL WASTE LABEL (Example)

UNIVERSAL WASTE	
BP TEXAS CITY	
<input type="checkbox"/> Batteries	<input checked="" type="checkbox"/> Mercury/Lightbulbs
<input type="checkbox"/> Paint/Paint Related Material	<input type="checkbox"/> Electronic Equipment
MO Number: _____	
Unit: _____ (to be filled in) _____	
Date: _____ (to be filled in) _____	
<small>bpAd BNA 401-0390-44</small>	

Attachment B

Map of Refinery Universal Waste Storage Area Put Mercury Containing Equipment Here

