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Doc Custodian: Environmental Supervisor		Refinery Safe Work Procedure
Approved By: Eric Kaysen	ENV-47 Drum Washing/Crushing Procedure	
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1.0 Purpose

The purpose of this procedure is to ensure proper safeguards are in place for employees who perform work using the drum crushing device (drum crusher).

The intent is to provide uniform safety guidelines for all personnel involved in activities related to drum crushing and associated general safe work practices at GBR.

2.0 Scope

Drum crushing of steel/metal drums for the purpose of reducing waste and recycling is the focus of this procedure. The device used to carry out crushing will rupture and collapse a steel drum, rendering it non-usable. Once the drum is crushed it will be classified as scrap metal. The collapsed metal should be placed into a scrap metal bin for proper storage.

3.0 Procedure

3.1 Roles and Responsibilities

3.1.1 Waste Technicians

3.1.1.1 Non-bulk waste technicians will be assigned to carry out tasks associated with drum crushing.

3.1.1.2 Their job safety analysis (JSA) should be based on the daily tasks.

3.1.1.3 They will be responsible for daily inspections and preventative maintenance on equipment. The equipment shall be maintained and operated to avoid fires, explosions and environmental releases.

3.1.1.4 The technicians will be under the direct supervision of the environmental waste group.

3.1.2 Contract Vendor

3.1.2.1 The contract vendor shall have a written training program that describes drum crushing procedures relevant to job duties and shall include function-specific training, safety, regulatory, and emergency procedures.

3.1.2.2 The designated staff member responsible for ensuring safety procedures are followed during the drum crushing process is the contract company safety site manager. This person shall enforce standards, rules and policies as they relate to staff actions and conduct.

3.1.3 Environmental Waste Team

3.1.3.1 The management of drum crushing will be overseen by the environmental waste group.

3.1.3.2 The environmental waste group representative shall follow up with the vendor regarding annual refresher training and all other requirements.

3.2 General Management Requirements

3.2.1 Waste technicians shall use precautions and proper ergonomic techniques whenever crushing drums. The staff's overall health and safety shall be addressed daily, including personal protective equipment (PPE), use of neutral hand positions and fatigue management.

3.2.2 Engineered solutions to environmental conditions and experienced staff judgment may be used for unique conditions and situations. The following PPE may potentially be required

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when crushing drums in accordance with GBR-HESS-PPE requirements:

- 3.2.2.1 FR-rated disposable coverall or apron
- 3.2.2.2 Face shield and or goggles
- 3.2.2.3 Chemical protective footwear
- 3.2.2.4 Chemical resistant gloves
- 3.2.2.5 Respiratory protection according to Marathon (MPC) respiratory protection plan
- 3.2.3 Drums that last contained a waste are only considered empty when less than 1 inch of material remains in them.
- 3.2.4 Before a drum is crushed, it must be deemed empty and if it once contained an acutely hazardous waste (per the hazardous waste label), then triple rinse per RCRA standards.
- 3.2.5 Residue removed from these drums must be placed into another container used for waste consolidation based on its type.
- 3.2.6 After the container used for excess residue is full, it should be managed no different from other waste streams generated onsite (sample if needed, store, characterize and then dispose).

3.3 Training Compliance Requirements

- 3.3.1 Contractors must have 40 hours of initial training that must cover HAZWOPER training requirements of 29 CFR 1910.120 and EPA 40 CFR 264.16 and cover all the site requirements.
- 3.3.2 All contractor supervision including MPC supervision will need to have 24-hours of training per the requirements of 29 CFR 1910.120 and will be required to have 40-hours of training if the personnel working at the site must wear respiratory protective equipment because of hazardous constituent exposure levels.
- 3.3.3 Additionally, all MPC employees and contractors performing work in the area with the potential to come in contact with hazardous waste shall have 24-hour initial training and 8-hour annual refresher training.

3.4 Reference Information

- 3.4.1 In the event of an emergency the contractor is responsible for contacting the SOC at
- 3.4.2 (409) 945-1765 and the Environmental waste group at (409) 771-2256 if any spills or release to the environment occurs.
- 3.4.3 The manufacturer recommended standard operating procedures must be followed at all times. Operating guidelines can be provided to all those working in and around the wash pad area.

4.0 Definitions

None

5.0 References

None

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6.0 Attachments

None

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-47 under MOC 93391.	J. E. Long	E. R. Kaysen	7/26/2021	8/20/2021