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## 1.0 Purpose

The purpose of this procedure is to define the requirements for managing universal wastes and electronic waste (E-Waste) generated at the Galveston Bay Refinery (East/West Plant and Bay Plant) and Dock Facilities. Universal wastes are potentially hazardous waste. 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, including the universal waste regulations.

## 2.0 Scope

This procedure applies to the management of universal wastes and electronic waste (E-Waste) generated in the Refinery operating areas, including associated docks, maintenance and contractor facilities.

## 3.0 Procedure

### 3.1 Roles and Responsibilities

- 3.1.1 GBR employees and contractors involved in the generation and management of universal wastes are responsible for following the requirements outlined in this procedure, up to and including transporting the waste to designated universal waste storage areas in the Refinery and Dock Facilities.
- 3.1.2 The Environmental Department is responsible for universal waste storage area inspections, container labeling and ensuring available capacity and coordinating the pickup, transportation and disposal of all universal waste to offsite disposal or recycling facilities.

### 3.2 Spent Batteries

#### 3.2.1 General Management Requirements

- 3.2.1.1 Spent batteries required to be managed as universal waste include lead-acid 12 volt or 6-volt lead-acid specialty batteries (lighting, small pumps and equipment), nickel-cadmium batteries (cell phones, electronics), nickel-metal hydride and lithium batteries. Alkaline batteries are exempt from the RCRA requirements, GBR will recycle these along with other batteries as good management practice. All spent batteries must be transferred to designated universal waste storage areas as soon as possible, but no more than 10 days after the battery or batteries become spent and/or discarded.
- 3.2.1.2 12-volt lead-acid automotive batteries are used as a core charge by the main garage personnel. These are a one for one swap when purchasing new automotive batteries for the refinery.

#### 3.2.2 Labeling and Storage Requirements

- 3.2.2.1 Batteries must be segregate by groups. Lead acid batteries must be carefully placed on pallets. Each battery must be dated with an indelible marker when the battery is spent or discharged. If a group of batteries are changed out at the same time they can be taped or shrink wrapped together and the entire package should be dated instead of each individual battery.
- 3.2.2.2 Solid batteries such as nickel cadmium and lithium-Ion batteries must be placed in a plastic drum pre-labeled "nickel cadmium, nickel metal-hydride, Lithium-Ion, lead acid and Alkaline batteries".
- 3.2.2.3 The drum labels must contain the date when batteries were first placed in the drum. The Environmental Department must set up and label/date new

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battery storage drums in the storage areas. Spent batteries that are not damaged and/or leaking must be labeled as universal waste. Spent batteries that are damaged and/or leaking must be labeled as hazardous waste.

### 3.2.3 Spent Battery Reclamation

3.2.3.1 Batteries can be stored up to one year from the date they are discarded. The Environmental Department will schedule pickup and delivery of spent batteries to an approved recycler once a shipment of batteries has been generated.

### 3.2.4 Spill Cleanup and Response

3.2.4.1 Spill from broken or leaking batteries are considered RCRA hazardous waste and must be reported to the Security Operations Center (SOC) immediately at extension 1762 or 1765. Report spills outside the plant at (409) 945-1762 or (409) 945-1765. The SOC will notify the Environmental Department.

## 3.3 Pesticides/herbicides

### 3.3.1 General Management Requirements

3.3.1.1 Pesticides and herbicide products that are out of date, obsolete, banned from use or no longer used by the Refinery must be managed as universal waste and accumulated in designated universal waste storage areas.

### 3.3.2 Identification of type and hazards:

3.3.2.1 Pesticides and herbicides come in many different formulations and vary in toxicity and management requirements. The first step in the disposal process is identifying the constituents in the products. A Safety Data Sheet (SDS) must be obtained and provided to the Environmental Department before pesticides and herbicides can be managed in universal waste storage areas.

3.3.2.2 If a SDS is unavailable in the workplace location where the pesticides are kept, the MPC Servicing Group Supervisor or designee must look in the refinery's SDS database. If a SDS cannot be found in the database, contact the manufacturer for assistance in obtaining this document.

3.3.2.3 If a SDS is unavailable and the labels and other information on the product containers are faded or illegible, contact the Environmental Department at (409) 771-2256 for assistance. The product may need to be analyzed at an outside analytical laboratory to determine its composition and classification.

### 3.3.3 Pesticides/herbicide container labeling

3.3.3.1 Label the container holding the obsolete product with a blue and white universal waste label, include the name of the pesticide or herbicide, if known, (write it somewhere on the label), and all other information required by the label.

3.3.3.2 If the original container storing the pesticide or herbicide is in poor condition and in danger of failure, transfer the container to a drum, label the drum as described above and contact the Environmental Department at (409)771-2256 as soon as possible.

### 3.3.4 Transfer to universal waste storage areas

3.3.4.1 After the containers of pesticides and herbicides are properly labeled transfer the container to the designated universal waste storage area. Contact the Environmental Department at 409-771-2256 if assistance is required.

3.3.4.2 Pesticides and herbicide waste generated in the Refinery must be transferred

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to the Universal Waste Storage.

3.3.4.3 Place the containers in the pre-labeled, blue plastic drums marked "universal waste pesticides and herbicides" in the storage area and secure the lid.

3.3.4.4 If the containers holding the waste pesticides/herbicides are too large to place in the drum or the drum becomes full, place the labeled pesticide container near the blue drum and contact the Environmental Department at (409) 771-2256 as soon as possible. Additional pre-labeled drums will be placed in the storage area within 24 hours.

### 3.3.5 Spill Cleanup and Response

3.3.5.1 Report any spills of pesticide or herbicide product to the Security Operations Center (SOC) immediately at extension 1762 or 1765. Report spills occurring outside the plant at (409) 945-1762 or (409) 945-1765. The SOC will notify the Environmental Department.

## 3.4 Mercury Containing Instrumentation

### 3.4.1 General Management Requirements

3.4.1.1 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.

### 3.4.2 Collection and Storage

3.4.2.1 Discarded mercury instruments shall be taken by the Maintenance Supervisor within 10 days of removal to the designated universal waste storage locations.

3.4.2.2 The instruments shall be placed in the pre-labeled universal waste drum marked for "mercury/bulbs" 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.

3.4.2.3 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.

3.4.2.4 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.

### 3.4.3 Spill Cleanup and Response

3.4.3.1 Report any spills of mercury to the Security Operations Center (SOC) immediately at extension 1762 or 1765. 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.

## 3.5 Lamps

### 3.5.1 General Requirements

3.5.1.1 Fluorescent lamps, HID bulbs, mercury vapor and high-pressure sodium lamps are regulated by RCRA universal waste regulations. Spent lamps and bulbs can be stored for one year after they become spent and discarded.

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### 3.5.2 Collection, Labeling and Box Closure-Fluorescent Lamps

3.5.2.1 When replacing spent fluorescent lamps, return the spent fluorescent lamps to the original manufacturer's container(s) and deliver to the designated universal waste storage area.

#### 3.5.2.2 Box Closure

3.5.2.2.1 When closing a lamp box, securely close one end of the lamp box by folding the cardboard flaps one over the other.

3.5.2.2.2 Seal the cardboard flaps with adhesive tape. Ensure all seams are taped closed so the box is completely sealed on the end.

3.5.2.2.3 Place the used lamps in the box. Fold the cardboard flaps on the open end of the box.

3.5.2.2.4 Seal the cardboard flaps with adhesive tape. Ensure all seams are taped closed so the box is completely sealed on both ends and cannot leak if a bulb were to break in transit. The closed lamp boxes must lack evidence of leakage, spillage or damage that could cause leakage of mercury to the environment.

3.5.2.3 Place a universal waste label on the box, date the label and check the. The user of this document must ensure the current approved version of its copy was printed on appropriate box on the label for "mercury/light bulbs" and underline light bulbs. Complete all other information on the label. Universal Waste labels can be obtained from the main warehouse.

3.5.2.4 Spent fluorescent lamps not already in a box shall be taken to the designated universal waste storage area and placed in one of the universal waste accumulation containers labeled "Unbroken Lamp Accumulation Container". The four-foot container is for lamps four feet and smaller in length and the eight-foot container is for lamps longer than four feet.

### 3.5.3 Lamp Storage

3.5.3.1 As spent lamps are generated, they shall be transferred to the designated universal waste storage areas located in the Refinery. See Attachment A for Universal Waste Storage Location.

3.5.3.2 Stack the filled boxes on the designated pallets in the storage area. Care should be taken not to break the lamps. Broken lamps and bulbs must be placed in a pre-labeled and dated plastic drum marked "broken lamps & bulbs" located in the storage area.

## 3.6 HID and Mercury Vapor Bulbs Management

3.6.1 Collect HID and mercury vapor bulbs (and any other bulb type that contains mercury) and place in pre-labeled drums located in the universal waste storage areas described above. Secure the lid on the drum before leaving the area.

3.6.2 When the drums are full, contact the Environmental Department at (409)771-2256 and a new pre-labeled drum will be provided within 24 hours. If the bulbs are broken place in the pre-labeled "broken lamps & bulbs" drum and secure the lid.

## 3.7 Paint Waste

### 3.7.1 General Management Requirements

3.7.1.1 Paint waste eligible for universal waste management includes discarded paint and paint related materials, paint contaminated materials, which includes: spent solvents used in painting, PPE, coating waste paint,

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overspray, paint filters, paint booth stripping materials, cleanup residues from spills of paint, residual paint substances associated with surface preparation, including paint chips, paint scrapings, sandblasting grit, paint cleaning liquids or discarded paint application, etc. See TCEQ Regulatory Guidance RG-370 for more information.

### 3.7.2 Paint Waste Collection and Storage

3.7.2.1 Fifty-five-gallon steel drums shall be used to collect and store paint waste near the point of generation. Drums are ordered through the main warehouse. The paint waste drum shall be kept in good condition and free of any leaks, cracks, or excessive corrosion. Consolidate same type liquid to minimize the number of drums. Drums should be used for each separate material generated: solvent with solvent, paint with paint, PPE and debris with other PPE and debris, etc. The drum shall be closed when not in use to minimize air emissions and exposure to nearby employees.

3.7.2.2 For thinners and solvents, the use of a venting device (similar to the picture below) to minimize pressure on the drum is required. These devices help to mitigate dangerous pressure buildup on drums while in storage or awaiting shipment.



3.7.2.3 The venting device will be removed prior to shipping to a disposal facility.

### 3.7.3 Paint Waste Drum Labeling

3.7.3.1 Drums containing paint waste shall be labeled with a Universal Waste Label. The labels shall be filled in completely. The box for "Paint/Paint Related Material" shall be checked. The label shall be dated when paint waste is first placed in the drum.

3.7.3.2 Empty Paint Pails and Container Management: Painters and workers shall ensure that paint cans, pails, buckets and other containers used to transfer and temporarily store paint product shall be emptied until there is less than 1 inch of residue left in the paint container. Containers having any liquid paint shall be stored at a designated waste accumulation area.

3.7.3.3 Once the paint can, pail or bucket is empty and contains no free running paint it shall be discarded in a designated empty paint can bulk container. The labels on the empty paint cans shall be removed or painted over.

### 3.7.4 Spill Cleanup and Response

3.7.4.1 Spills from paint related material must be reported to the Security Operations Center (SOC) immediately at extension 1762 or 1765. Report spills outside the plant at (409) 945-1762 or (409) 945-1765. The SOC will notify the Environmental Department.

## 3.8 Electronic Waste (E-waste)

### 3.8.1 General Management Requirements

3.8.1.1 Electronic Waste or E-waste includes discarded electronic equipment, such

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as radios, TV's, appliances, computers, circuit boards and other electronic devices.

3.8.2 Electronic Waste Collection and Storage

3.8.2.1 Electronic waste is contained within the universal storage area. Contact the waste phone at 409-771-2256 to schedule a pickup

3.8.3 Labeling

3.8.3.1 Currently E-Waste is handled as a recycling commodity.

**4.0 Definitions**

4.1 Universal Waste – Universal waste is a category of waste materials designated as "hazardous waste" but containing materials that are very common. It is defined in 40 C.F.R. 273.9, by the United States Environmental Protection Agency but states may also have corollary regulations regarding these materials.

Universal waste includes:

- 4.1.1 Batteries; Lithium Ion, Silver Ion, nickel cadmium (Ni-Cad), mercury-oxide, or sealed lead-acid. Spent Lead-Acid Batteries being reclaimed do not need to be managed as universal waste.
- 4.1.2 Pesticides; Stocks of a suspended and canceled pesticide that are part of a voluntary or mandatory recall
- 4.1.3 Mercury Containing Equipment; a device or part of a device (including thermostats) that contains elemental mercury integral to its function.
- 4.1.4 Lamps; include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps.
- 4.1.5 In the State of Texas, paint and paint related material is handled and treated as a universal waste.

**5.0 References**

None

**6.0 Attachments**

6.1 Attachment A – Universal Waste Storage Location

**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-33, GBR-HESS-34, GBR-HESS-ENV-35, GBR-HESS-ENV-44, REW-N149-WAST-TC, REW-N165-WAST-TC and REW-N150-WAST-TC under MOC 93391.	J. E. Long	E. R. Kaysen	7/26/2021	8/20/2021



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### Attachment A – Universal Waste Storage Location

