Authored By: Monica Gibbs Doc Custodian:	Blanchard Refining Company LLC Galveston Bay Refinery	Doc No.: REW-000025-GB Rev No: 0
Environmental Supervisor Approved By:	ENV-46 Waste Container	Refinery Safe Work Procedure
Eric Kaysen Date Approved: 7/26/2021	Decontamination Procedure 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 ensure proper safeguards are in place for employees who perform work on containers that last held waste material.

The intent is to provide uniform safety guidelines for all personnel involved in activities related to washing empty waste containers at GBR.

2.0 Scope

Container cleaning will be performed to remove waste residue from empty containers that once stored waste material. The cleaning process will certify the containers as "Clean" where they are able to be reused without cross contamination. The heavier solids will either be vacuumed out or manually dug out. All remaining liquids will be washed out to the pad. Once the container is clean it will be inspected and returned to the container owner.

3.0 Procedure

3.1 Roles and Responsibilities

- 3.1.1 Container Wash Technician
 - 3.1.1.1 Container wash technicians will be assigned to carry out tasks related to waste container (roll off, vacuum and trash boxes) cleaning and empty container logistics and movements.
 - 3.1.1.2 Container wash technicians will be required to complete a container cleaning checklist daily (attached). Their day-to-day tasks should be based on their safe work permit and job safety analysis (JSA).
 - 3.1.1.3 Container wash technicians will be responsible for daily inspections and preventative maintenance on equipment. The equipment and work area shall be operated and maintained to avoid fires, explosions and environmental releases.
 - 3.1.1.4 The container wash technicians will be under the direct supervision of the environmental waste representative.
- 3.1.2 Contract Vendor
 - 3.1.2.1 The contract vendor shall have a written training program that describes the container washing 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 container cleaning process is the contract company safety 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 container washing 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 <u>General Management Requirements</u>
 - 3.2.1 Container wash technicians shall use precautions and proper ergonomic techniques

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whenever washing containers. 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 when washing containers in accordance with GBR-HESS-PPE Personal Protective Equipment:
 - 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 Waste containers that last contained a waste are only considered empty when less than 1 inch of material remains in them.
- 3.2.4 Before a container (roll-off) is washed, it must be deemed empty per RCRA standards if it once contained a hazardous waste.
- 3.2.5 Residue removed from these containers must be placed into another container used for waste consolidation based on its classification 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 disposed).
- 3.3 <u>Training Compliance Requirements</u>
 - 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 due to chemical 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 HAZWOPER refresher training.

3.4 <u>Reference Information</u>

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

4.0 Definitions

None

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5.0 References

None

6.0 Attachments

6.1 Attachment A: Container Cleaning Checklist

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-46 under MOC 93391.	M. L. Gibbs	E. R. Kaysen	7/26/2021	8/20/2021

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Attachment A

Container Decontamination Start-Up Checklist

Tasks	Y	Ν
1. Do all personnel understand how to summon for help in the event of an emergency and is there a safety		
plan in place?		
		
2. Are all equipment safety devices functional?		<u> </u>
3. Are employees properly trained to perform container cleaning?		
4. Are there barricade tags posted and a caution barrier line visible?		
5. Is the maximum operating pressure clearly visible on the pressure washer?		
		<u></u>
6. Is there a debris/residue material disposal plan in place?		
7. Is the water supply for the pressure washer from an approved source?	T	
		<u> </u>
8. Is the pressure washer operator equipped with the proper PPE?		
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9. Has surrounding electrical equipment been properly identified and protected?		
10.Are other employees working in the area aware of all the hazards?		
11.Do all employees working in the area have clear communication (sight/sound) with one another?		
12. Is the equipment being used in serviceable condition including hoses, fittings and other connections?		
13.Are the container haulers aware of all the work being conducted at the wash pad?		
14. Have all employees reviewed and signed the Job Safety Analysis?		

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