

Authored By: John Long	<b>Blanchard Refining Company LLC Galveston Bay Refinery</b>	Doc No.: RSW-000028-GB Rev No: 0
Doc Custodian: Environmental Supervisor		<b>ENV-27 Waste Handling Guideline</b>
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## 1.0 Purpose

To provide guidance for the handling and disposal of both wastes and containers that are generated during normal plant operations, construction projects, and maintenance activities.

To comply with environmental regulations.

To define the responsibilities of persons involved with waste and container handling and disposal.

## 2.0 Scope

This procedure applies to anyone (employee or contractor) who generates, handles, transports, etc. waste at the Galveston Bay Refinery. **If there are any questions concerning waste handling and disposal requirements, contact the GBR Waste Group at 409-771-2256, or by plant radio on Zone 9 Waste.**

## 3.0 Procedure

### 3.1 Roles and Responsibilities

3.1.1 **ALL Operation and Maintenance personnel** are responsible for ensuring that the steps listed in Section 6.1 **every time a waste is generated**. The Summary of Waste Handling procedures spreadsheet provides additional information regarding specific waste streams. Any questions regarding waste management procedures should be directed to the GBR Waste Group **immediately**.

3.1.2 The **MPC Coordinator** or **Maintenance planner** is responsible for all the following activities:

3.1.2.1 Making arrangements to obtain the proper container prior to beginning work. Contact the GBR Waste Phone for roll off boxes and the Main warehouse for drums. All wastes must be containerized and labeled at the time of generation. Ensure that the container is compatible with the type of waste generated, Poly or plastic drums for sulfur, hydrocarbons should use metal.

3.1.2.2 When containers are full, notify the waste group for pick up and removal to a proper waste management storage area.

3.1.2.3 Coordinating with the waste group to obtain samples and waste disposal approval when planning a job which will require disposal of refinery waste (e.g., soil, catalyst, tank bottoms, etc.). Samples must be taken at the moment the waste is first generated.

3.1.2.4 Ensure that all materials generated in the alky units are properly decontaminated per ROG-0020-6030 Unit procedures before discarding.

3.1.3 **Environmental** is responsible for all the following activities:

3.1.3.1 Determining if a waste is hazardous or non-hazardous.

3.1.3.2 Determining waste classification once the analytical results have been received.

3.1.3.3 Obtaining all necessary approvals and profiles from the disposal facility for the waste.

3.1.3.4 Ensure that all the utilized transporters and disposal facilities are vetted by MPC corporate.

3.1.3.5 Preparing all appropriate shipping documents, as needed.

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- 3.1.3.6 Obtaining all necessary corporate approvals for waste disposal facilities.
- 3.1.3.7 Create, review and sign all shipping documents and manifests, as needed.
- 3.1.3.8 Arranging for pickup and disposal to the appropriate disposal facility, using the appropriate licensed waste transporter, as needed.
- 3.1.3.9 Maintaining records of analytical results, profiles, manifests, Bills of Lading, and VOC monitoring results.
- 3.1.3.10 Reviewing and updating this Waste Handling Guideline as necessary.
- 3.1.4 **The site's waste contractor** is responsible for all the following activities:
  - 3.1.4.1 Collecting waste samples as requested by environmental and arranging for the appropriate analysis.
  - 3.1.4.2 Updating/providing labeling and storage information once the waste classification has been received from Environmental.
  - 3.1.4.3 Inspecting the hazardous waste accumulation areas weekly and documenting the inspections using the site's electronic data collection system.
  - 3.1.4.4 Coordinate with the LDAR SME or LDAR contractor about what containers require VOC monitoring.
  - 3.1.4.5 Coordinate with the BWON SME about what containers require inspecting and for recordkeeping purposes.
  - 3.1.4.6 Directing waste transporters to appropriate location in the refinery for container delivery and/or pickups.

### 3.2 General Waste Handling Guidelines

The following are general requirements related to waste handling and disposal

- 3.2.1 Refinery waste generated from process units and maintenance activities should be handled separately and should not be placed into the plant trash. It is the responsibility of all personnel to follow proper waste handling guidelines in the refinery. If you have any questions, please contact the waste group at 409-771-2256 or on the plant radio system on "Zone 9 Waste"
- 3.2.2 For **ALL WASTES** generated, the following steps must be taken to ensure proper management of the waste.
  - 3.2.2.1 **CONTAINERIZE WASTE.** All waste must be containerized in UN approved drums, roll-off boxes, hoppers, flow bins, fluorescent lamp boxes or other approved containers that are appropriately sized for the material to be stored. Ensure that the proper container is used for the type of waste that is generated.
  - 3.2.2.2 **LABEL CONTAINER.** All trash containers will be labeled. Once waste is placed into containers, the container must be labeled with the name of the waste and the date (the date must be when waste was first placed into the container – not the date the container is full). It is the responsibility of the person who places trash in a container first to ensure that the container has the appropriate trash label. Containers without labels are in violation of HazCom and RCRA standards.
  - 3.2.2.3 **CLOSE OR SECURELY COVER CONTAINER.** Immediately after placing waste into the container and completing the task (i.e., within 15 minutes), the container cover must be securely fastened. Lids must have seals and be

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bolted, bungs should have gaskets and be tightened, and tarps must be securely fastened and in good condition to shed all rainwater. Fluorescent lamp boxes must be taped closed.

- 3.2.2.4 **CONTAINER MOVEMENT.** Once the container is full or the job is complete, the container must be moved to the proper accumulation area within 3 days for hazardous wastes and as soon as practical for non-hazardous wastes. When a container is moved to a storage area, contact the waste phone at 409-771-2256 or by plant radio at "Zone 9 Waste".
- 3.2.2.5 **UNIT/AREA RESPONSIBILITY.** The unit/area has responsibility for management of wastes in their SAA and notifying the waste group of full satellite accumulation containers. The units are responsible for the signs and secondary containment in their units.

### 3.3 Waste Storage Areas

Storage locations are listed on the maps below:

#### 3.3.1 Bay Plant

##### 3.3.1.1 Waste Management Unit map:



GBR Bay Plant  
WMU Map.pdf

##### 3.3.1.2 Satellite Accumulation Area map:



GBR Bay Plant SAA  
Map.pdf

#### 3.3.2 East/West Plant

##### 3.3.2.1 Waste Management Unit map:



GBR East West  
WMU Map.pdf

##### 3.3.2.2 Satellite Accumulation Area map:



GBR East West SAA  
Map.pdf

### 3.4 Empty Containers

The procedure for handling empty containers for return or disposal is as follows:

- 3.4.1 Determine if there is a deposit on the returned container which can be collected upon return of the container to the supplier. Notify the warehouse of empty containers with deposits so that the empties can be picked up when new containers are delivered. (This mainly applies to gas cylinders at Bay Plant.)
- 3.4.2 Containers that cannot be returned to the supplier should be completely emptied. There must be less than 1-inch of product in the drum.

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- 3.4.3 Calibration gas containers are turned over to the waste contractor for disposal
- 3.4.4 For empty containers, contact the waste group by plant radio at "Zone 9 Waste". Empty drums and totes should never be placed in a "Plant Trash" box unless instructed to do so by the waste group.
- 3.4.5 Oily containers (except drums) should be thoroughly drained and put in the oily trash roll off. The labels should be painted over or removed.
- 3.4.6 Other types of non-oily empty containers (i.e., bottles, cans, buckets, etc.) should be thoroughly rinsed and the label removed from the container. The container may then be disposed of in the oily trash dumpsters.

### 3.5 Hazardous Waste Container Emission Monitoring

Hazardous waste storage containers (e.g., roll off boxes, flow bins, etc.) larger than 120 gallons in light material service must be monitored for VOC emissions. The waste contractor and LDAR contractor work together to ensure that the correct containers get monitored in the necessary time. The emission monitoring records are tracked

### 3.6 Management of Hazardous Waste in Satellite Accumulation Areas

Hazardous waste may be accumulated in a "satellite accumulation" area for greater than 90 days if ALL of the following conditions are met:

- 3.6.1 Only 55-gallon or smaller containers can be used for satellite accumulation. Only one container can be located at any single accumulation point. Any time more than 55 gallons are accumulated, the waste must be moved to the Hazardous Waste Storage Area.
- 3.6.2 Ensure that the container is compatible with the waste being stored (e.g. acid waste in poly drums, hydrocarbon in steel drums).
- 3.6.3 The container must have a Hazardous Waste label with the name of the waste filled in (the date should NOT be put on the drum label until the drum is full).
- 3.6.4 The accumulation container must be located at or near the point of waste generation.
- 3.6.5 Satellite Accumulation Areas that are assigned to process units are the responsibility of the unit.
- 3.6.6 The drum must be under the control of the operator of the process generating the waste.
- 3.6.7 The drum must be closed (i.e., bungs in place and tightened, lid sealed and bolted) unless waste is being added to the container.
- 3.6.8 When the drum is full, the date should be added to the Hazardous Waste label and the container transferred to the Hazardous Waste Storage Area within 3 calendar days. Contact the waste group on "Zone 9 Waste" or dial 409-771-2256 for drum movement.
- 3.6.9 For additional guidance, please refer to the visual standards for Satellite Accumulation Areas.
- 3.6.10 Satellite accumulation areas should only be used for hazardous wastes which are generated on a regular basis (i.e., daily or weekly). For hazardous wastes which are only generated once a month or less frequently, the waste should be placed into a drum and transferred to the Hazardous Waste Storage Area as soon as the process/activity generating the waste is complete. Satellite Accumulation Areas are inspected weekly using the site's electronic data capturing device.
- 3.6.11 If additional locations are needed, contact Environmental for assistance in determining what meets the definition of a satellite accumulation area for specific hazardous wastes.

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### 3.7 Waste Storage Area Inspections

- 3.7.1 Federal and state regulations require that hazardous waste storage areas be inspected on a weekly basis.
- 3.7.2 Weekly inspections of the hazardous waste storage areas are performed by the site waste contractor and documented using the site's electronic data capturing device.
- 3.7.3 Please review the sites inspection procedure for further direction.

### 3.8 Management of Used Oil

- 3.8.1 Used oil is generated throughout the refinery during routine and preventative maintenance activities. The term "Used Oil" must be either written or a label placed on the container. Used oil must be managed in the refinery slop oil system to be exempt from hazardous waste regulations. Therefore, the following procedure should be followed when used oil is generated:
- 3.8.2 Small quantities of used oil:
  - 3.8.2.1 Place oil in the "Used Oil" totes located around the facility.
  - 3.8.2.2 These drums are vacuumed out on a routine basis; however, if a drum is full contact the vacuum truck contractor, your Maintenance Area Coordinator or job representative.
- 3.8.3 Large quantities of used oil:
  - 3.8.3.1 Contact the vacuum truck contractor, your Maintenance Area Coordinator or job representative to have the used oil removed directly from the equipment.
  - 3.8.3.2 The used oil collected from used oil drums and/or directly from equipment is placed into the refinery slop oil system.

### 3.9 Waste Handling and Disposal during Turnarounds

- 3.9.1 An Environmental Turnaround Plan will be developed for each turnaround and will detail the specific management requirement for each waste to be generated.

### 3.10 Manifesting Wastes

All waste manifests leaving the facility must be signed by a person properly trained in EPA's RCRA and DOT Hazardous Material Transportation Regulations.

Special care should be taken when preparing or signing manifests for the following types of Waste:

- 3.10.1 **Benzene:** With each shipment that contains benzene regulated under 40 CFR 61 Subpart FF, a notice must be included that states that the waste contains benzene which is required to be managed and treated in accordance with the provisions of 40 CFR 61 Subpart FF.
- 3.10.2 **Asbestos:** Any asbestos manifest must always contain the following information. Pay special attention to the underlined information as it is not on normal manifests.
  - 3.10.2.1 The name, address, and telephone number of the waste generator.
  - 3.10.2.2 The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
  - 3.10.2.3 The approximate quantity in cubic meters (cubic yards).
  - 3.10.2.4 The name and telephone number of the disposal site operator.
  - 3.10.2.5 The name and physical site location of the disposal site.

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- 3.10.2.6 The date transported.
- 3.10.2.7 The name, address, and telephone number of the transporter(s).
- 3.10.2.8 A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.

3.10.3 **Soil:** All soil that has been excavated at the East/West Plant should also list SR MACT as a special condition.

3.10.4 All manifest information is currently stored in the Site's waste tracking tool. Copies of returned and signed waste manifests are maintained on site for a minimum of 3 years.

#### 4.0 Definitions

- 4.1 **Containers:** Roll off boxes, flow bins, drums, cans, bottles, etc.
- 4.2 **DOT:** U.S. Department of Transportation
- 4.3 **EPA:** U.S. Environmental protection Agency
- 4.4 **E-Waste:** waste consisting of discarded electronic products, such as computers, processors, radios, televisions, mobile phones, etc.
- 4.5 **HazCom:** Hazard Communication – labels or symbols on a container which assists in identifying the risks of the container contents. HazCom is an OSHA standard.
- 4.6 **Hazardous Waste:** Waste that is hazardous based upon its characteristics (i.e., ignitable, reactive, corrosive or toxic) or is from a listed source (i.e., wastewater treatment sludge, hydrotreating catalyst). The characteristics of the waste can be determined by analytical testing or using generator knowledge. Hazardous waste cannot be stored on-site for more than 90-days.
- 4.7 **Hazardous Waste Storage Area:** A storage area which has been designated as acceptable for the storage of Hazardous Waste.
- 4.8 **MPC Job Coordinator:** The MPC employee responsible for coordinating the project.
- 4.9 **Non-Hazardous Waste:** Any waste that does not meet the definition of hazardous waste.
- 4.10 **Resource Conservation and Recovery Act (RCRA):** This is the federal regulation which governs the identification and management of hazardous waste.
- 4.11 **Satellite Accumulation Area (SAA):** Storage area for up to 55-gallons of hazardous waste as of near the site of generation for greater than 90-days.
- 4.12 **TCEQ:** Texas Commission on Environmental Quality.
- 4.13 **UN Approved Drum:** Drum designed, tested, and labeled to meet requirements established by the United Nations.
- 4.14 **Used Oil:** Oil generated from the draining of equipment or vehicles. Used oil does not include oil from tank bottoms or oil from clean ups.
- 4.15 **VOC:** Volatile Organic Compounds.
- 4.16 **Waste Management Unit (WMU):** Storage area which has been designated as acceptable for the storage of hazardous, non-hazardous and/or universal waste.

#### 5.0 References

- 5.1 RCRA Subpart CC Monitoring Form

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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-27, GBR-HESS-ENV-36 and GBR-HESS-ENV-38 under MOC 93391.	J. E. Long	E. R. Kaysen	7/26/2021	8/20/2021