



STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL COMPLIANCE OFFICE
SUITE 900 - JAMES K. POLK BUILDING
505 DEADERICK STREET
NASHVILLE, TENNESSEE 37243-0334

TDOT STANDARD OPERATING PROCEDURE - ENVIRONMENTAL

NO.
002

Subject: **WASTE ACCUMULATION AREAS**

Reviewed and
approved by:

Barry Brown, PE

Facilities and MS4/TSCS Program Manager, TDOT Environmental Compliance Office

8-5-02-17

Date

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5-5-17

Date

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1.0 PURPOSE AND SCOPE

This Standard Operating Procedure (SOP) applies to the accumulation of hazardous and/or special wastes in containers in Accumulation Areas (AAs) at TDOT facilities. All TDOT facilities that generate hazardous and/or special waste must accumulate the wastes awaiting transport in designated AAs. The length of time waste may be accumulated is dependent upon the type of waste and the generator status of the facility. Typically, Region and District facilities are Resource Conservation and Recovery Act (RCRA) Conditionally Exempt Small Quantity Generators (CESQGs) of hazardous waste, although they may become Small Quantity Generators (SQGs) or even Large Quantity Generators (LQGs) in any given month. County garages rarely generate hazardous waste and are generally classified as RCRA CESQGs. This SOP applies to AA management at any facility regardless of the generator status. This SOP applies to all containers managed within a designated accumulation area at a TDOT facility.

1. At District and Region facilities, all personnel responsible for the operation of the AA or who work within the AA will have completed RCRA training.
2. All AAs will be located at least 50 feet from the TDOT property boundary. AAs will be located indoors under roof, protected from the weather. The AA will be secured to prevent unauthorized access.

3. Each AA will be posted with a sign at each entry point. The sign will contain words such as, "DANGER — Hazardous Waste, Unauthorized Personnel Keep Out." The names and 24-hour phone numbers of personnel responsible for operation will be posted at each point of entry. Additionally, "No Smoking" signs will be posted at each AA.
4. Communication devices, such as a portable radio or telephone, will be immediately available at the facility. An emergency contact list shall be posted near communication devices at the TDOT facility.
5. Emergency spill response equipment (e.g., spill kit), as specified in the *Spill Prevention and Response at TDOT Facilities SOP-01*, will be located near each AA.
6. Wastes will be accumulated only in U.S. Department of Transportation (U.S. DOT)-approved containers (those containers meeting the performance specifications of 49 Code of Federal Regulations [CFR] 178). All containers must be compatible with the waste being placed in the container and meet the U.S. DOT packaging requirements of 49 CFR 172 for that material.
7. All containers will be in good condition, with no signs of corrosion, bulging, or denting. When containers used to accumulate waste are discovered to be damaged, the waste will be transferred within 24 hours to a container that is in good condition. Contents of leaking containers will be immediately transferred to a new container upon discovery.
8. All containers in an AA will be labeled using appropriate labels. The date the waste container was placed in the AA will be written on the label. Labels will be clearly marked and visible for inspection. Containers of hazardous waste will use a hazardous waste label or clearly marked with the words "Hazardous Waste".
9. Containers will remain securely closed except when adding or removing wastes. Containers will be securely closed by replacement of the lid, bung, or drum ring (as appropriate) after waste transfers are complete. When waste is being added or removed from the container, measures such as funnels or drum pumps will be used to prevent spillage. Funnels or other devices will be removed and the container securely closed by replacement of the lid or bung within 15 minutes of completing the waste addition or removal operation.
10. Containers of liquid waste will be accumulated within secondary containment so that spilled or leaked material is captured. Secondary containment (such as spill pallets) must hold a minimum of 10% of the total volume of liquid hazardous waste or the volume of the largest container placed upon the pallet, whichever is the larger volume. Constructed berms or diking may also serve as a means of secondary containment. Dikes or berms must be constructed to contain a minimum of 10% of the total volume of the liquid wastes in the AA or the volume of the largest container.
11. Only containers holding similar waste streams (compatible wastes) may be placed upon the same spill pallet or within the same diked area. Incompatible wastes (i.e., materials that react when mixed) must not be placed upon the same pallet or within the same diked/bermed area. Furthermore, incompatible wastes must never be placed within the same container.

12. Containers and spill pallets will be arranged to ensure that aisle space exists between the pallets/containers to enable inspection of each container. As a rule of thumb, aisle space of at least 30 inches is sufficient. For 30-gallon drums and larger, rows of containers can be no wider than one pallet or two containers wide. Container labels must be facing out so they are clearly visible from the aisle space. Containers of 30-gallon size or greater will not be stacked during accumulation.
13. Ignitable or reactive hazardous wastes must not be accumulated in an area where ignition sources are present (i.e., open flames, smoking areas, electrical sparks, heat, cutting and welding).
14. Containers must be managed in a manner that prevents spills, overfilling, or ruptures. A minimum of 2 inches of freeboard (i.e., empty space below the cap or lid) will be maintained in the container.
15. Prior to moving a container of waste, it will be inspected to ensure that the bung or lid is secure and that the container is structurally sound. Single containers will be moved using drum dollies or a forklift fitted with a drum grapppling fixture. Prior to moving a pallet of containers, the containers will be secured (e.g., strapped together). Pallets used for containers of hazardous waste will be structurally sound. Containers will be placed on pallets so that a significant portion of the container's bottom surface does not overhang the pallet.
16. In the event of a spill of waste within an AA, all waste and contaminated residue will be collected and put in a container that is in good condition. Spill pallets will be decontaminated before reuse. All waste generated from the clean-up will be containerized and managed appropriately. Any waste generated from hazardous waste spill clean-up activities must be managed as a hazardous waste.
17. Each AA containing hazardous and/or special wastes will be inspected weekly to ensure that this SOP is being followed and containers are in good condition. Findings will be noted on the weekly inspection form. AAs will also be informally inspected each time waste is moved into or out of the AA. Any noncompliance with the requirements of this SOP must be corrected promptly upon discovery, and the corrective actions taken must also be noted on the inspection form. Should there be no hazardous and/or special waste in the AA, weekly inspections are not required. Documentation of this status is required and may be completed by noting on an inspection form that no waste is in the AA. Sign, date, and maintain the note along with the AA inspection records. Once waste is again placed in the AA, weekly inspections must resume.
18. AA inspection records will be maintained within the appropriate color-coordinated notebook at the facility for at least three years after the date of inspection.
19. All hazardous wastes placed within an AA must be shipped for treatment and/or disposal before the specified accumulation timeframe is exceeded. The accumulation start date used to determine if waste has exceeded the applicable 90-day or 180-day timeframe will be the date the waste was placed in the AA (see Item 8 in this section). The accumulation time period for LQGs is 90 days. For SQGs the accumulation time period is 180 days. There are no accumulation time period requirements for CESQGs, provided the facility has less than 2,200 pounds (approximately four 55-gallon drums) of hazardous waste accumulated onsite.

20. To enable proper planning of hazardous/special waste transportation and disposal efforts, the TDOT personnel responsible for operating AAs must complete a Monthly Inventory form. Note on the form any special circumstances which may require attention, such as space limitations in the AA. The form should be submitted to the Regional or Assistant Regional Environmental Coordinator's office by the 5th of each month.
21. Compliance with the 90-day and 180-day hazardous waste accumulation time limits will be monitored by the Environmental Compliance Office using the Monthly Inventory forms submitted. The Environmental Compliance Office will be responsible for making all arrangements for hazardous waste transport and disposal in compliance with these deadlines.
22. Facilities must maintain monthly waste accumulation inventories. All monthly inventories must be accurate and up to date.
23. Facility personnel must notify the Regional Environmental Technical Group and the TDOT Environmental Compliance Office of any uncharacterized wastes immediately upon discovery.

Each AA will be under the control of personnel designated by the facility manager. This person(s) has the responsibility for ensuring this SOP is followed.