	ENV-DOC-001	
	Hazardous Waste Management	
	Issued by: Environmental Department	Last Reviewed 12/2019

- 1.0 **PURPOSE:** To promulgate the requirements of MHI’s Hazardous Waste Management Plan to all MHI employees, contractors and sub-contractors.
- 2.0 **SCOPE:** Applies to all employees, contractors and sub-contractors on all MHI jobs and at all MHI facilities.
- 3.0 **RESPONSIBILITIES:** The MHI Environmental Manager is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Environmental Manager along with upper management is authorized to amend these instructions and is authorized to halt any operation of this company or a company working with or for MHI where there is danger of personal contamination, personal injury or damage to the environment.
 - 3.1 **Responsible persons:** All MHI employees, contractors and sub-contractors that generate, handle, package, transport, store, recycle, reclaim, dispose, or, accumulate hazardous waste are responsible for complying with all Coast Guard, federal, state, and local requirements and guidelines which includes the Virginia Department of Environmental Quality (DEQ) and the Environmental Protection agency (EPA) .
 - 3.2 When Hazardous waste is generated during the performance of the work steps or methods are to be taken or used to minimize or reduce the volume and toxicity of Hazardous Waste. This is done by using process controls, substituting products or using less hazardous material, minimization techniques, or technological resources when possible.
- 4.0 **REQUIREMENTS:**
 - 4.1 **Marking Requirements:** All Hazardous Material must be clearly marked with the name of the company using the product before bringing onto the pier or *MHI job site*.
 - 4.2 **Packaging Requirements:** No less than one week prior to beginning any job that will generate hazardous waste, the job supervisor will confer with the *MHI Project Team* or Environmental representative to anticipate the type and quantity of waste(s) that will be generated and ensure that waste drums, which are required for packaging hazardous waste, meet the following requirements:
 - 4.2.1 Hazardous waste drums will be provided by the MHI Environmental department.
 - 4.2.2 Drums must be kept closed at all times except when actually depositing waste into the drums. This closed condition means that the drums lid or




bungs are securely fastened. If using an open top drum with a drum ring and bolt, the bolt must be turned down and tightened to create a leak proof seal.

- 4.2.3 Secondary containment designed for drum storage must be used while accumulating hazardous waste in waste drums. Either a portable drum containment enclosure or storage in an approved flammable / hazardous storage locker is acceptable. The secondary containment must be kept *free of rain water*, of rags, trash and other debris and *be provided by the waste generator*.
- 4.2.4 Prior to any hazardous waste being deposited in the waste drums, the job supervisor will contact the MHI Environmental department to attain the correct labels for the specific type of waste. Labels must be affixed to the waste drum prior to hazardous waste being deposited in the drum. The labels will be dated and accumulation time may not exceed 90 days.
- 4.2.5 Waste Drums *shall be protected* during the accumulation period to prevent waste from dripping down the outside of the drum or *covering labels*.
- 4.2.6 Waste Drums must not be overfilled. When filled the waste level in the drum must be no higher than four to six inches from the top of the drum.
- 4.2.7 When waste drums are full the drum lid and bungs must be securely sealed and the retaining ring tightened with the bolt facing down to prevent the possibility of leakage / spillage while handling the drum.
- 4.2.8 Once the waste drum is full and sealed, MHI's Environmental department shall be notified to take custody of the drum and replace with an empty drum as required. If an empty drum is supplied all requirements of this procedure apply.

4.3 Satellite Accumulation Area (SAA): The location of the Satellite Accumulation Area (SAA) must be approved by the MHI Environmental department. The location of the SAA may be changed during the course of the job due to changing facility requirements or as requested by the contractor utilizing the SAA. In either case, the new location must be approved by the MHI Environmental department prior to moving the SAA. The SAA must be inspected weekly by the generator and must be able to provide documentation of inspections. * Inspection forms can be obtained from the Environmental and Safety department.

- 4.3.1 Rubber matting or other suitable means shall be provided by the


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contractor/company who is generating the hazardous waste to protect the area around the SAA from waste splatter and drippings.

- 4.3.2 The contractor/company who is generating the hazardous waste will:
 - 4.3.2.1 Provide and maintain all applicable Safety Data Sheets at the SAA and provide copies to the *MHI Safety Dept.*
 - 4.3.2.2 Provide and maintain a fully charged CO2 fire extinguisher at the SAA.
 - 4.3.2.3 Provide and maintain all applicable personal protective equipment for the handling of the hazardous materials in use in accordance with the SDS for that material.
 - 4.3.2.4 Provide and maintain an emergency eye wash station within a 5 second walk of the SAA. The portable eye wash station must comply with ANSI Z358.1-2004.
 - 4.3.2.5 Provide and maintain a minimum 55 gallon size hazardous material spill kit at the SAA.
- 4.3.3 The MHI Environmental department will periodically inspect the SAA to ensure compliance with this procedure.

4.4 Hazardous Waste Spill Procedures.

- 4.4.1 Any spills of hazardous or potentially hazardous materials must be immediately reported to MHI Security at 228-1940 or 644-7280 or *MHI's Project Team.* The following information is required:
 - 4.4.1.1 Location of the spill.
 - 4.4.1.2 Type of material spilled.
 - 4.4.1.3 Amount of material spilled.
 - 4.4.1.4 Potential for environmental contamination such as hazardous material getting into the river, soil or into the sewer system.
 - 4.4.1.5 Any personnel injuries.
 - 4.4.1.6 The company name and on-scene point of contact including

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phone number(s).

4.4.1.7 Clean-up procedures in progress and if there is a need for additional assistance.

4.4.1.8 Any additional information as requested.

4.4.2 In the event of a hazardous or potentially hazardous material spill, the company, contractor or sub-contractor will immediately clean-up the spill and provide a full incident report to the MHI Environmental department within 24 hours.


4.5 Training: All employees, contractors, or subcontractors that will be handling hazardous waste must be trained by their company at least annually on Hazardous Waste Management and must review and be familiar with the safety data sheets for that material.

4.6 MHI Environmental and Safety department personnel are to be trained in Hazardous Waste Management including Hazardous Waste identification and documentation. (Employee certificates - Ref. 5.3)

4.6.1 Training attendance sheets indicating that this requirement has been met must be legible and will be turned in to the MHI Environmental department upon request. MHI environmental personnel will spot check the knowledge level of individuals handling hazardous material/waste with respect to these requirements throughout the course of the job.

4.6.2 If contractor or subcontractor personnel handling hazardous material/waste are found to be unfamiliar with this procedure or applicable SDS's, retraining will be accomplished by their company. Documentation of this retraining will be turned in to the MHI Environmental department within 24 hours. Until MHI's Environmental department receives this documentation, those personnel cannot work with hazardous material/waste. Training material can be obtained from the Environmental and Safety department.

4.7 Empty Container Disposal: The unused contents of paint, thinner or other hazardous *chemicals* must be poured into waste drums for disposal *if not kept for reuse*. In the case of paint wastes, less than one inch of solids can be left in cans, liners or buckets. Empty paint cans, liners and buckets must be placed on pallets without lids in a single layer for ease of inspection by the MHI Environmental department or *Project Team*. Palletized cans must be wrapped in plastic to

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prevent contamination.

4.7.1 Under no circumstances will hazardous material containers be disposed of without the approval of MHI’s Environmental department or *Project Team*.

4.8 Hazardous Waste Disposal

4.8.1 MHI will only use companies that are licensed and authorized to remove, transport, and dispose of Hazardous and non-Hazardous waste. Documentation from waste disposal company currently being used by MHI will be kept on file for review. (Ref. 5.4) When Hazardous Waste is to be generated off site such as naval facilities or other contractor facilities MHI will coordinate with the host facilities POC in advance to ensure full compliance with the host sites requirements for Hazardous Waste storage and disposal.

4.9 MHI POC’s for Hazardous and Non-Hazardous waste generation, storage, and disposal are as follows:

Dan Small – Environmental and Safety manager (757) 449-7040

Bob Sivills – Lead Environmental and Safety inspector (757) 438-4521

Dave Lackner – Environmental and Safety inspector (757) 803-6613

5.0 REFERENCES AND ASSOCIATED DOCUMENTS

5.1 40 CFR 261.7 par; b. 40 CFR 262.34, 40 CFR 264.170 to 264.179, 40 CFR 265.16, 40 CFR 265.170 to 265.179

5.2 MHI EPA generator ID numbers:
543 East Indian River Rd. Norfolk Va. 23523 - #VAD119077303
1215 Warrington Avenue. Norfolk Va. 23507 - #VAR000508408

5.3 Employee training certificates provided upon request

5.4 Hazardous Waste disposal company documentation provided upon request

6.0 ATTACHMENTS: NONE