

ATTACHMENT D-1
STANDARD OPERATING PROCEDURES

VEOLIA ES Technical Solutions, L.L.C.

STANDARD OPERATING PROCEDURE

Title:	Portable Tote Pumping	Effective Date:	Revised 04-5-13
Department:	Phoenix Operations	SOP Number:	OP-10
Approval:	Mike Bomgardner	Section:	
Approver's Title:	Transportation Manager	Page:	1 Of 3

1.0 PURPOSE:

The function of this Standard Operating Procedure (SOP) is to provide requirements associated with the transfer of PCB oils from portable totes to tanker trucks.

2.0 SCOPE:

Portable totes are used in the PCB processing areas. The tote can hold approximately 250 liquid gallons of material. Due to the construction of the tote the processor can see the level of liquid in the tote at any time. When the tote is full it is moved from the processing area directly to outgoing storage area in Building #3 for transfer off site. All liquid-containing totes are maintained in a secondary contained area to minimize the risk of a spill. In order to transfer the liquid from the portable tote to a tanker truck for off site shipment Veolia Environmental Services, L.L.C. (Veolia) must contract a licensed waste hauler to provide this service. Veolia may also utilize its internal transportation resources to provide off-site transfer of waste oils. Tanker shipments occur when needed; with the capacity of the load being approximately 5,000 gallons of PCB oil.

3.0 USER:

This Standard Operating Procedure will be used by any Veolia production employee managing portable totes to the extent applicable or assisting in the transfer of tote contents to a tanker and truck drivers who pump the contents of portable totes into tanker trucks for off site shipment. All tanker truck drivers must read and understand the full context of this SOP before being authorized to transfer at the Veolia site. Attachment 1 must be signed off by each driver authorized under this SOP. A copy of each signed acknowledgement will be maintained in the driver's training file or other location as determined by the EHS Department. **If you have not been trained on the safe operation of the tanker equipment or this SOP stop and call your dispatcher for guidance on who to contact at Veolia for training.**

4.0 PROCEDURES:

VEOLIA ENVIRONMENTAL SERVICES PERSONNEL PROCEDURES:

- Each portable tote that is filled by Veolia personnel must be immediately moved from the process area to the storage area in Building #3.
- Veolia Operations Supervisor or his designee must schedule tank truck when there is sufficient number of full totes for offsite shipment.
- Veolia Operations Supervisor or his designee will verify that the spill prevention procedures are in place prior to the driver pumping any totes.

TANKER TRUCK DRIVER PROCEDURES:

- I. Upon arrival at Veolia and prior to pumping.
 - Any sub-contracted Transporter must sign in with receptionist at Building #1.
 - Back tanker into Building 3 truck well. **Note: transfer operation cannot commence unless tanker is located in truck well. This is an additional measure to ensure that any accidental release associated with the operation will be contained.**
 - Veolia Operations Supervisor or his designee will verify what totes are to be pumped and assign a second person to assist with throughout the pumping operation.
 - Attach a hose to the vapor recovery system – vacuum pump exhaust and put the other end into an empty tote on the outside of the building. (Get tote from inside Veolia building)
 - **Note: Make sure hoses do not contain residual oil prior to connecting to the tanker.**
 - Secondary containment **must** be used to protect facility surfaces in the event of a breach of the hose. To achieve secondary containment all flexible hose will be placed within six (6) inch flexible plastic irrigation pipe.
 - Place drywell cover or other suitable material over or around the drywell to the south of the loading area. This is to ensure that there is no spill or release of oil to the drywell.
 - Put on the proper Personal Protective Equipment which includes: Tyvek disposable coveralls or apron, gloves, safety glasses, and steel toed work boots.

- II. While pumping contents of portable totes into tanker trailer.
 - Keep a record of the estimated gallons you are putting into the tanker at all times.
 - Check on the tanker for any problems on a routine basis (every three to five totes)
 - Should you encounter any problems, immediately shut the tanker down.
 - If you spill any oil in the secondary containment area inside the building;
 - Stop the operation and notify appropriate Veolia facility personnel immediately.
 - Under the direction of the Emergency Response Coordinator, clean the spill in accordance with instructions in the SPCC.
 - If any oil is spilled outside the building or outside of secondary containment;
 - Veolia Emergency Coordinator's will take control of the incident and advise as to further procedures.

- III. After tanker trailer is loaded and ready for departure.
 - Clear the lines of any remaining oil.
 - Disconnect the hose from the tanker valve, plug and cap each end and put back on the tanker trailer.
 - Disconnect the hose from the vapor recover system-vacuum pump exhaust plug and cap ends and put back on tanker trailer.
 - Remove all secondary containment six (6) inch hose and put into storage. Note, if the 6" hose is contaminated, place the contaminated section(s) in the PCB debris container for disposal.
 - Put empty tote back in the building
 - Placard tanker as required.
 - Remove any contaminated PPE and dispose of at the direction of Veolia Operations Supervisor.
 - Bring all barcode labels from the totes that were loaded into the tanker to the shipping department to be entered into the tracking system.

- Review the shipping papers for accuracy and completeness prior to signing. Items to check for on the shipping paperwork include;
 - Correct shipping names as required by 40 CFR Part 171.101
 - Correct number of containers and quantities are listed on manifest.
 - Out of service date listed on manifest if shipment contains regulated PCB's.
 - RQ listed on manifest where required.
 - Transporter name, EPA ID number, and phone numbers are correct.
 - 24 hour emergency number and contact information is listed.
 - All other areas of the manifest are completed correctly.
 - Veolia must sign paperwork prior to leaving the site.
- Sign out with receptionist in Building #1.

5.0 REGULATORY/PERMIT REQUIREMENTS:

Veolia Environmental Services, L.L.C. processes PCB equipment which requires disposal of the waste liquid oil at a permitted TSCA incineration facility or recycling facility as required. Veolia collects this liquid in portable totes that are stored in secondary containment for shipment offsite. Facility procedures and permit conditions require that all storage areas must be inspected for leaks, faulty equipment, and capacity on hand. Veolia has a PCB Commercial Storage Permit, Storm Water Pollution Prevention Program (SWPPP) and a Spill Prevention Control and Countermeasures Plan (SPCC) which dictate how to handle a spill or emergency that relate to a spill of PCB liquid. Veolia sets high standards for environmental compliance and expects each individual involved in this operation to comply with all regulations set forth.

Attachment 1:

Portable Tote Transfer SOP Training Acknowledgement

I _____ of _____ (company) have read and understand the Standard Operating Procedure for pumping the portable totes of PCB or non-PCB oil into my tanker truck. This SOP is the guidance document that I will follow anytime I am at the Veolia Environmental Services, L.L.C., Phoenix, Arizona facility. If I have any questions while on the site I will contact the site Operations Supervisor for guidance. If the Operations Supervisor or his designee is not available I will stop the operation until I can get my questions answered to my satisfaction.

Drivers Name (print)

Drivers Name (sign)

Date