Standard Operating Procedure 002: Straddle Carrier Wash Racks Maintenance & Operation

1.0 PURPOSE

This procedure serves to prevent the disposal of oils, greases, and heavy metals into the municipal waste and storm water infrastructure.

2.0 REFERENCES

2.1 Resource Conservation and Recovery Act (RCRA)
2.2 ISO 14001 Standard (Operational Controls)
2.3 HRSD Waste Water Permits (NIT)

3.0 SCOPE AND RESPONSIBILITIES

3.1 The scope of this procedure encompasses the NIT Straddle Carrier Wash Area.

3.2 This procedure is to ensure the proper operation and maintenance of the straddle carrier wash areas to prevent the discharge of unauthorized materials into the waste water and storm water streams.

3.3 The NIT Crane Maintenance Division is responsible for the Straddle Carrier Wash Rack.

3.3.1 Crane Maintenance is to ensure the prevention of the disposal of oils, greases, and heavy metals into the municipal waste and storm water streams, and that the oil/water separator is maintained in such a way to accommodate collection and disposal efforts.

4.0 REQUIREMENTS

4.1 NIT Straddle Carrier Wash Rack

4.1.1 Pre - Operational Requirements:

4.1.1.1 A pre – visual inspection should be done before washing starts.

4.1.1.1.1. The Pre-Operational inspection will include but not limited to the following:

4.1.1.1.1.1. Ensure the wash rack is free from blockages of the wash drain system. .

4.1.1.1.1.2. Ensure the surrounding areas of the wash rack are clean.

4.1.1.1.1.3. If debris are present, place in steel drums located in the pad area.

4.1.2 Wash Rack Operation

4.1.2.1 To operate the wash rack, the employee will need to push in the power switch to "ON" which is located in the pressure washer storage room.

4.1.2.2 If more assistance is needed for operation or equipment malfunction, notify the Crane Maintenance Manager.

4.1.2.3 When washing of equipment is complete, users will clean the pad area BEFORE moving equipment out of wash area to avoid tracking grease out of the wash pad area.

4.1.2.4 The grease that was cleaned from the pad will be stored in steel drums on the wash rack pad while waiting to be properly disposed of by a certified EPA waste hauler.

4.1.2.5 After the pad is cleaned the employee will push the power button switch to "OFF"

4.1.3 Post – Operational Requirements

4.1.3.1 A visual Post – Operational inspection will be conducted when the last strad has been washed for the day.

4.1.3.2 The Post-Operational Inspection will include but not limited to the following:

4.1.3.2.1. Ensure the wash rack is clean and blockages from the wash drain system have been removed.

4.1.3.2.2. Ensure the wash pad area is free of debris.

4.1.3.2.3. Properaly dispose of any trash and debris in the steel drums located by the drain pad area.

4.1.3.2.4. Any grease, sludge, trash, and debris shall be stored in drums located (in the equipment storage room) on the pad by the drain while waiting to be properly disposed by a certified EPA waste hauler

4.1.3.2.5. Ensure the surrounding areas of the wash rack are clean.

4.1.4 Maintenance requirements of the Straddle Carrier Wash Rack Facility

4.1.4.1 NIT Crane Maintenance conducts a monthly preventative maintenance inspection on the wash facility. (**See Attachment 6.2) (NIT Only)**

4.1.4.2 NIT Crane Maintenance conducts a monthly storm water inspection on the wash facility (**see Attachment 6.3).**

4.1.4.3 The Sustainability Department will conduct a quarterly inspection of the straddle carrier wash rack facility and a quarterly inspection of the oil/water separator.

4.1.4.3.1. The oil/water separator will be cleaned out on an "as-needed" basis.

5.0 CONSEQUENCES OF DEVIATION FROM PROCEDURE

5.1 Deviations from this procedure could result in the discharge of wash waters to the Elizabeth River, which is not an allowable discharge under the facility VDPES General Storm Water Permit. Such a discharge could result in fines or notices of violation from the Virginia Department of the Environment and/or could result in harm to individuals or the environment.

5.2 Improper disposal of oily wastes could result in fines or notices of violation from the Virginia Department of the Environment and/or could result in harm to individuals or the environment.

6.0 ATTACHMENTS (Controlled Documents)

6.1 Monthly preventative maintenance Inspection form.

6.2 NIT Crane Maintenance Monthly Inspection Form

7.0 RECORDS FOR MONITORING AND MEASURING

7.1 Applicable Material Safety Data Sheet (MSDS).

7.2 Non-hazardous Waste Manifests (Disposal Records)

7.3 Monthly Prevenative Maintenance Records

7.4 VPA Quarterly Inspection Records

7.5 VPA Quarterly Oil/Water Seperator Inspection Records

8.0 DEFINITIONS

8.1 Waste Generator - any person, by site, whose act or process generates, receives or accumulates universal, hazardous, or oily wastes.

8.2 Approved Waste Transporter **-** means a person engaged in the off-site transportation of waste by air, rail, highway, or water. The transporter must have a valid EPA issued identification number, and is licensed to do business in Virginia.

9.0 REVISION HISTORY

9.1 Effective Date: 11/10/2009

9.2 Latest Revision Date: 3/7/17 removed PMT B.401 wash rack. 2/28/17 – updated PMT wash rack operational requirements. 2/14/17 – short shore will now monitor trash in wash rack. 11/30/15 – updated PMT wash rack requirements. 8/7/15 – updated reporting requirements for PMT wash rack. 4/3/15 – updated PMT wash rack requirements. 1/6/15 – updated PMT b.401 wash rack regs. 4/15/14 – updated pre and post washing inspection form and monthly PM Form. 11/13/13 – updated for the re-opening of the PMT wash rack, permit acquired 11/2013. 6/14/12 – added updated monthly inspection form. 4/2/12 – removed the vehicle wash bay from this procedure and added it to SOP007. 3/30/2012 – updated to show that trash and debris are to be put in steel drums located in the pad area. 1/10/2012 – Revised both wash rack procedures to make one for equipment wash racks and one for container wash racks. 11/22/11 – Removed contractor from straddle carrier wash rack, crane maintenance has taken back over the wash rack. 6/1/11 – Revised to show records are stored in facilities maintenance foremans office. 3/17/2011 – Revised to show straddle carrier's contractor daily maintenance/cleaning log. 11/9/2010 – Revised for Straddle Carrier Wash Rack to reflect the hire of a new contractor. 4/27/10 – revised after SOP Review with Facilities Maintenance. 11/10/2009

9.3 Approval: Scott Whitehurst, EMR

9.4 Last Reviewed: 3/19/19

9.5 Reviewer: Billy Goodson, Manager, Sustainability

THE PORT OF VIRGINIA

Monthly Facility Storm Water Inspection

All areas of this form must be completed on its entirety. If a line item does not apply to your operation, check the NA box.

Material Storage Area Questions (Inside/Outside Areas)	Yes	No	NA	Comments
Are spill clean-up materials nearby and available for use?				
Are used batteries stored under cover, on secondary containment, and clearly labeled "Used Batteries"?				
Do used batteries have an Accumulation Start Date?				
All material drums closed, stored on secondary containment, and have proper labels?				
Are all universal waste (flourescent bulbs) stored in closed containers/boxes with Accumulation Start Dates?				
Are Flammables stored in proper flammable cabinets?				
Any maintenance needed to ensure the containment of large spills or leaks inside the material storage room / maintenance building?				
Are Aerosol Can Puncture Devices closed (if not in use)				
Pressure Washing and Wash Rack Areas	**Yes**	**No**	**NA**	**Comments**
Are soaps and detergents kept closed and stored inside?				
Is the wash area free from litter and debris?				
Is wash equipment stored inside wash shed?				
Is wash equipment leaking?				
Are there signs of oily runoff around wash rack area? (front and back)				
Blasting, Sanding and Painting Areas	**Yes**	**No**	**NA**	**Comments**
Are spent abrasives collected and properly disposed?				
Does painting/sand blasting take place outside?				
Does the area have evidence of paint overspray or blast grit?				
Engine Maintenance and Repair Areas	**Yes**	**No**	**NA**	**Comments**
Does the area have evidence of spills and leaks of engine fluids?				
Are oily parts stored under cover?				
Material Handling Areas	**Yes**	**No**	**NA**	**Comments**
Any evidence of material spillage on ground?				
Are all metals stored under cover or up on pallets?				
Are tires stored outside on rims?				
Are materials stored under cover?				
General Yard Areas	**Yes**	**No**	**NA**	**Comments**
Are storm water inlets in the area free from debris and dirt?				
Is there evidence of oily runoff in the grass area between the wash rack and the maintenance shop?				
Does the oil filter in the drop inlet by the wash rack need to be replaced?				
Does Absorbent Boom at the opening to the drop inlet filter need to be replaced?				
Are scrap parts and metal are regularly removed from the area?				
Litter and debris in the general area is:	**Excessive**	**Minimal**	**None**	**Comments**

Work Order Issued for any Repairs? _____

Name of individual performing inspection: _____

Company Inspected: _____

Date of Inspection: _____

Revision Date: 3/17/2014