

	CONOCOPHILLIPS ALASKA Health Safety and Environmental North Slope Empty Drum and Tote Management Standard Operating Procedure	Issued: 5/11/2009 Revised: 11/7/2021 Reviewed: 02/17/2024
Retention Code AD01	Procedure Owner/Author Operations Environmental coordinator	SOP Number: W-005

Empty Drum and Tote Management

Scope

This Standard Operating Procedure (SOP) applies to empty containers previously holding chemicals or products used for ConocoPhillips Alaska Inc. (CPAI) operations and contractors providing services to CPAI at Western North Slope and Kuparuk on the North Slope.

If containers still contain product, they should be stored properly for use on another job. If there is no further use for containers that still contain chemicals or product, contact environmental for disposal options.

Purpose

This SOP outlines responsibilities for proper empty drum and tote management. Wherever possible, totes or other larger volume reusable containers should be used.

In some cases, a project-specific Waste Management Plan may have been written that would potentially supersede this SOP.

Training

1. SAA/UAA training or Redbook training is not required for disposal or manifesting of RCRA empty containers, though it is recommended for the foreman or manager in charge of ensuring containers are RCRA-empty.
2. SAA/UAA training is required for transporting hazardous waste using a ConocoPhillips Internal Waste Manifest.
3. Redbook training is required for transporting waste using a North Slope Manifest.

Procedure

1. If possible, RCRA-empty drums or totes should be returned to the distributor. If reuse or return to the distributor is not possible then the following steps must be followed.
2. **Ensure all containers are RCRA-empty before they are moved from the job site.** For a drum or tote, RCRA-empty is defined as being emptied as much as possible by normal means and having no more than 1-inch of residue left in the container. Store drums and totes in containment even though they are empty as there is still residual liquid in them.
3. Clearly **label** drums or totes with the last known contents.
4. Make sure bung tops and lids are on and secure.
5. Obtain an **SDS** of the last known contents and attach to the drum or tote.

Note: Containers previously containing certain types of materials, such as foams, polymers, or other water insoluble material, cannot be washed at the KRU Washbay or the Alpine Drum Crusher. These containers must either be shipped offsite for disposal by a waste disposal company or cleaned out using absorbents and possibly solvents - work with the Field Environmental Coordinator to determine the best method. These materials include (but are not limited to):

- Stadis 425
- AFMR 20134A Defoamer
- Schmoo-b-gone (RG-2401)
- Baraklean
- BB3100

At Alpine:

- a. **Ensure all containers are RCRA-empty before they are moved offsite. For foams, polymers, and other water insoluble material, contact Environmental for further instructions on disposal.**
- b. Contact ACS prior to dropping drums or totes off at the J6 & J7 Hazardous Waste Central Accumulation Area (HWCAA) facility at ext. x4588.
- c. Give the SDS of the drum or tote contents to ACS when the drum is dropped off. In addition, the transporter must sign the drum log located inside the HWCAA located on the desktop or drop off a copy of the completed log with the drums or totes.
- d. Periodically, ACS will attach a copy of the SDS to the Internal Manifest and arrange for transportation to Kuukpik Pad Mud Plant. Alternatively, they may choose to ship the empty containers to a waste contractor off-slope for disposal.
- e. Drill rigs manage transport of empty drums directly to the Kuukpik Mud Plant.

At Kuparuk:

- a. **Ensure all containers are RCRA-empty before they are moved offsite.**
- b. Drums that contained hazardous materials are taken to the C&D Warehouse. A Field Requisition (FR) form or Internal Waste Manifest is required for acceptance of the drum at C/D Warehouse. If possible, the C&D warehouse (659-7586) should be notified of the date and time the drums and totes will be delivered at least one or two days ahead of time, to ensure no conflicts.
Note: There are several recurring sources of empty drums that are approved to be sent to the washbay directly without a FR, where they are rinsed and crushed onsite (the generator certifies the drums are RCRA-empty and the washbay personnel will check), such as:
 - i. Deicer fluid
 - ii. Windshield wiper fluid
 - iii. Hydraulic fluid
 - iv. Motor oil
- c. All drums and totes sent to C&D warehouse will be inspected to ensure the container is RCRA empty by measuring the depth of the chemical inside. If it is not RCRA empty, the C&D warehouse technician will contact Environmental and will not accept it but return the container to the person or group who delivered it.

Once a drum is determined to be RCRA empty, the C&D warehouse technician will determine if one of three options is appropriate:

- i. **Return to the distributor/manufacturer:** RCRA-empty drums and totes for return to the distributor/manufacturer will be sent to the Kuparuk C&D warehouse using a Field Request form or Internal Waste Manifest. Arrangements with the Warehouse Foreman and the distributor or manufacturer must be made before delivering the containers to C&D warehouse.
- ii. **Washbay clean and crush:** RCRA-empty drums and totes for cleaning and crushing for scrap metal recycling will be sent to the KIC Washbay. The contents of the drums and totes must be indicated on the paperwork – e.g. “RCRA-empty drums previously containing methanol”. A copy of the SDS must be provided and transportation arranged. The AES Industrial Hygienist will be contacted with a copy of the SDS if it is not a chemical routinely handled by the washbay.
- iii. **Send to Anchorage disposal company:** C&D Warehouse personnel will store the RCRA-empty drums and/or totes on their dock temporarily, keeping track of the drum numbers and contents on the empty tote log. When enough drums and/or totes have accumulated, they will send the drums and/or totes out of Kuparuk for disposal, in coordination with the Field Environmental Coordinator.

Contact Environmental at 670-4200 (Alpine) or 659-7212 (Kuparuk) if you have any questions.