P-Building Overfire Water Tank Operations Instructions

Purpose: To describe the functions surrounding the selection and approval of candidate drums, fill operations and use of the P-Building Overfire Water Tank.

Scope: All staff performing either selection, approval, delivery of drums, receiving drums, tank loading or operations of the P-Building Overfire Water Tank system.

PPE: Uniform or tyvek, nitrile gloves, safety shoes, safety glasses or face shield.

Note: The materials being transported, received and loaded into the P-Building Overfire Water Tank contain Active Pharmaceutical products that are typically OHC-3, 4 or 5, have a pH between 4-10, are aqueous with buffers, salts and surfactants, and contain no solvents. These containers should be managed to reduce all contact with the liquids contained and to clean-up all spillage from operations.

Operations: The P-Building Overfire Water Tank system is designed to operate as a replacement source of water for the primary chamber. The tank system should be filled whenever there is a supply of water and when the incinerator is operating.

The tank system should be set to "Automatic" on the panel whenever the system has water content greater than the lower level indicator. When the tank level reaches the Low Level indicator, the system will stop feeding from the tank and switch the water supply to City water. To restart the system after the tank is refilled, the Operator must reset the system by switching the system to "Off" then returning the switch to "Auto".

In the event of malfunction, contact the Maintenance staff and P-Building management.

Dissolution Waste Procedures

1) When dissolution waste drums are brought into the waste storage area at either HMMB or Venture, they should be labeled as Hazardous Waste.
2) The paperwork for drums located at HMMB should be placed in the wall mounted file outside of 1.189 labeled **"Incoming Dissolution Waste"** and the drums located at Venture should be placed in the desktop file labeled **"Incoming Dissolution Waste"** so not to be mixed up with other waste streams.
3) At such time when the drums are to be tested, a review of the content sheet for each drum should be completed. The waste technician who will be testing the drums should confirm that the drums to be tested match the paperwork and are dissolution waste drums **ONLY**.
    a. Any drums with solvents should not be classified as dissolution waste and must be treated as hazardous waste.
4) When drums are ready to be tested, they should have the LEL monitored using the 4 gas meter. If the LEL is at 1 or above, the drum should not be treated as dissolution waste and must be treated as hazardous waste.

5) Once the drum has been monitored for LEL and the reading is zero, the pH should be tested. If the pH is below 6, the technician should add one scoop of sodium carbonate and mix into the drum. The technician should continue to add sodium carbonate until the pH is between 6-10.
6) After neutralizing the drums, the results should be recorded on the content sheet. The technician should use the **Dissolution Waste stamp**, which includes; initials of person neutralizing drum, the date it was neutralized, the pH reading and the LEL reading. The neutralization log, which is kept in the inspection book at each location, should be filled in for each drum neutralized as well. (Attachment 1) Once completed, the label on the drum should be replaced with a blue non-regulated dissolution waste label. At HMMB, the drum sheet should then be placed in the wall mounted file outside of 1.189 labeled **"Neutralized Dissolution Waste".** At Venture, the drum sheet should be placed in the desktop file holder labeled **"Neutralized Dissolution Waste".**
7) Once the drums have been identified and labeled as dissolution waste, they are ready to be shipped to the P-Bldg. The person shipping the drums should double check each drum sheet to confirm that it has been neutralized. They must also note on the neutralization log sheet the date the drums were shipped. The bar code number of each drum must also be noted on the BOL. (Attachment 2) Each of the drum content sheets should be stapled to the BOL.
8) When the drums are shipped to the P-Bldg, they should be stored on Waste Pad 2. The paperwork (BOL and drum sheets) must be given to the Clean Harbors program manager for approval to be pumped into the Overfire Water Tank. Once approved, the paperwork will be placed in the Overfire Water Tank binder in the **"Approved for Pumping"** section, which is to be kept in the incinerator control room.
9) As needed, the drums should be brought down to the lower level of the incinerator and pumped into the Overfire Water Tank immediately. Prior to being pumped, the paperwork should be matched to each drum to confirm that it is acceptable for pumping. The incinerator technician must record each drum that is being pumped into the tank on the Non-Regulated Aqueous Drums for ECI Overfire Water Tank, which is kept in the front of the Overfire Water Tank binder. (Attachment 3) They must record the drum #, the date the drum was pumped and their initials. The BOL and drum content sheets should be placed in the **"Drums Pumped"** section of the binder.

P-Building Overfire Water Tank Loading Instructions

1) Stage 4 to 8 drums of API contaminated water.
2) Make sure that tank level is not above the high level during filling.
3) Open tank inlet valve.
4) Check strainer set-up valves to ensure one set open, other set closed.
5) Open drums.
6) Insert lance into drum.
7) Cut on pump air.
8) Once drum is empty cut off valve at lance and move lance to next drum.
9) When all drums empty, cut off lance valve and pump air.
10) Close tank inlet valve.
11) Reset the system to "Auto" run status.

10) Upon completion of pumping drums, labels should be removed from the drums, the top of the drums must be wiped down, and the drums should be moved up to the warehouse for storage. Any drums which are grossly contaminated on the outside or are showing signs of age should be placed on Waste Pad 3 to be disposed of.

Attachment 1

Drum #	Date Neutralized	Initials	Date Shipped	Drum #	Date Neutralized	Initials	Date Shipped

Attachment 2

SHIPPER PROVIDED SHORT FORM BILL OF LADING
FOR MOTOR CONTRACT CARRIAGE

Five Moore Drive
Research Triangle Park, NC 27709
(Permanent address of shipper)

DATE:		CARRIER'S PHONE #:	919-315-3754
CARRIER:	Clean Harbors Env. Services, Inc.		

SHIPPER:		CONSIGNEE:
GLAXOSMITHKLINE		GLAXOSMITHKLINE
HMMB	Venture	P-Bldg Incinerator
5 Moore Dr.	4117 Emperor Blvd.	3025 Cornwallis Rd.
RTP, NC 27709	Morrisville, NC 27560	RTP, NC 27709
(circle one)		

NUMBER OF PACKAGES:	* HM	Cont. Type	DESCRIPTION OF PRODUCT:	CLASS	WEIGHT (lbs): (Subject to correction)
		55DF	Non Hazardous, Non DOT Regulated Material (dissolution waste)		
TOTAL Packages:		24-Hour Emergency Response Hazardous Material Contact Number:			TOTAL Weight (lbs):
		919-483-2700			

List of drum numbers shipped:

Certification as to HM: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

Shipper
Signature: _____ Date: _____

Shipment tendered in apparent good condition, exceptions noted.

Received by: _____ Date: _____

Shipment received in apparent good condition, exceptions noted.

*HM -- Mark with X to designate hazardous materials as defined in the Department of Transportation regulations governing transportation of hazardous materials.

Any questions concerning this shipment should be directed to GlaxoSmithKline EHS at 919-483-1660. **eBOL Rev 2-25-2008**

Attachment 3

Non-Regulated Aqueous Drums for ECI Overfire Water Tank

Filters elements: Rosedale Products Inc (ph 800-821-5373) filter model no. 88-3409 NMO 800 P8S-H

Drum #	**Date Charged**	**Initials**	**Drum #**	**Date Charged**	**Initials**