

SECTION I - PART B

WASTE ACCEPTANCE / HAZARDOUS WASTE EXCLUSION PROGRAM

**WASTE ACCEPTANCE / HAZARDOUS WASTE EXCLUSION
PROGRAM**

WEST HAWAI'I SANITARY LANDFILL

WAIKOLOA, HAWAI'I



PREPARED BY

WASTE MANAGEMENT OF HAWAII, INC.

JUNE 2015

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1 INTRODUCTION

Waste Management of Hawaii (WMH) has implemented a **WASTE ACCEPTANCE / HAZARDOUS WASTE EXCLUSION PROGRAM** at the West Hawai'i Sanitary Landfill (WHSL) in order to:

- Define acceptable and unacceptable wastes.
- Establish procedures for preventing, detecting, and managing wastes that are not suitable for disposal at the landfill.
- Define special wastes.
- Establish procedures for reviewing, approving, and handling special wastes for disposal at the landfill.

This Program complies with the operating criteria for municipal solid waste (MSW) landfills as detailed in the Code of Federal Regulations (CFR) [40 CFR §258.20] and the Hawai'i Administrative Rules (HAR §11-58-15a):

"Owners or operators of all MSWLF units must implement a program at the facility for detecting and preventing the disposal of regulated hazardous wastes as defined in part 261 of this chapter and polychlorinated biphenyls (PCB) wastes as defined in part 761 of this chapter."

The specific requirements of these regulations include 1.) Random inspections or other steps to ensure incoming loads do not contain regulated hazardous waste or PCB waste, 2.) Records of inspections, 3.) Training of personnel to recognize regulated hazardous waste or PCB waste, and 4.) Notification of the Hawai'i Department of Health (DOH) if a regulated hazardous waste or PCB waste is discovered.

These regulations define "regulated hazardous waste" as solid waste that is a hazardous waste, per 40 CFR §261.3, that is not excluded for regulation as a household hazardous waste under 40 CFR §261.4(b), or was not generated by a conditionally exempt small quantity generator (CESQG) per 40 CFR §261.5. Household hazardous waste and hazardous waste generated by a CESQG are exempt from the screening requirements (See Attachment C).

2 SITE INFORMATION

The WHSL is located at 71-1111 Queen Kaahumanu Highway in North Kona on the northwest portion of the island of Hawai'i. The facility is located between the Queen Ka'ahumanu and Mamalahoa Belt Highways, approximately 6,600 feet inland from Pueo and Keawaiki Bays (see Figure 1).

2.1 Site Description

The WHSL is a permitted Municipal Solid Waste (MSW) landfill for the disposal of all non-hazardous solid wastes. The WHSL property covers approximately 300 acres. The permitted waste footprint, which covers approximately 150 acres, is basically square and is divided into a series of smaller waste disposal cells (see Figure 2). Waste disposal began in the northern portion of the permitted waste footprint (Cell 1) and has since extended eastward. The landfill office, scale house, and maintenance shop are located along the northern property line of the facility.

3 WASTE ACCEPTANCE POLICY

The WHSL's waste acceptance policy is described below. The lists of acceptable, unacceptable, and special wastes are subject to change as regulatory requirements warrant.

3.1 Acceptable Wastes

The following waste materials are accepted for disposal at the WHSL:

- Non-hazardous solid waste from municipal, commercial, industrial, and household sources
- Construction and demolition debris (as allowed by local regulations)
- CESQG waste
- Pre-approved special waste (see Section 3.0 for details regarding special waste)

A solidifications pit is available at the WHSL for the disposal of non hazardous solid waste material that is determined to contain "free liquids" as defined by Method 9095 (Paint Filter Liquids Test), as described in *Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods*.

3.2 Unacceptable Wastes

The following waste materials are not accepted for disposal at the WHSL:

- **Regulated hazardous, dangerous, or radioactive waste** (40 CFR § 261, HAR 11-261 and HAR 11-58.1).
 - ✓ In an effort to minimize the potential for radioactive waste generators to dispose of radioactive material at the West Hawai'i Sanitary Landfill, the following actions will be taken. Once annually, the West Hawai'i Sanitary Landfill will contact the State of Hawaii Department of Health Indoor and Radiological Health Branch for an updated list of radioactive waste generators located on the island of Hawai'i. Following receipt of the updated list, letters will be sent to each potential radioactive waste generator stating that the West Hawaii Sanitary Landfill does not accept radioactive waste for disposal.
- **Poly-chlorinated biphenyl (PCB)-containing waste.**
 - ✓ PCB concentration > 50 mg/kg or ppm (small non-leaking capacitors contained in fluorescent light ballasts, white goods, and other electrical appliances are not considered regulated PCB wastes).
- **Explosive materials.**
- **Untreated medical waste.**

- **Any waste that:**
 - ✓ Is deemed to have a **reasonable likelihood of damaging the facility or processing equipment;**
 - ✓ **May pose a threat to health or safety;**
 - ✓ **May cause a violation of any applicable law.**
- **Chlorofluorocarbon (CFC) - containing appliances** (See Appendix B).
- **Electronic waste (e-waste)** (See Appendix C).
- **Bulk or Non-containerized Liquids.**
 - ✓ Any waste determined to contain "free liquids" by the paint filter test (EPA Method 9095A).
- **Automobiles / scrap vehicles.**
- **Vehicle batteries.**
- **Tires (whole, cut, sliced, chipped or shredded).**
- **Hot loads.**
 - ✓ Waste that is on fire or capable of igniting other materials; smoldering waste.
- **Compressed gas tanks.**

3.3 Special Waste

The term "special waste" refers to non-hazardous waste that requires special processing and handling/disposal techniques due to the quantity or volume of the material, or its unique physical, chemical, or biological characteristics. Types of special wastes that are accepted at the WHSL include, but are not limited to:

- Asbestos (friable and non-friable) (See Appendix A)
- Water separation, car and equipment washes (residues from water separators/steam car washes/equipment washes)
- Sewage sludge
- Scrap metal
- Off-specification and outdated products
- Used oil-contaminated debris*
- Underground storage tank and other sludges
- Solid resins and chemical debris*
- Petroleum (and other) contaminated soils
- Gasoline/jet fuel/kerosene-contaminated debris*
- Diesel/motor-type fuel-contaminated debris*
- Sandblast grits

- Baghouse dusts
- Inorganic filter cakes
- Paint waste from removal, construction and demolition
- Treated poles and lumber
- Empty containers
- Dead animals and offal
- Treated (non-infectious) medical waste
- Properly managed/treated (rendered non-hazardous) materials that are of a toxic nature, such as insecticides, poisons, or radioactive materials
- Other contaminated industrial/commercial waste & non-TSCA regulated PCB soils, provided such materials are not regulated hazardous waste. Certain exempted TSCA-regulated waste may also be accepted.
- Solidification pit – non hazardous solid waste material that is determined to contain “free liquids”

NOTE: debris* = contaminates / waste generated when manufacturing a product or performing a service

See Section 4.0 for an explanation of the WHSL Special Waste Acceptance Program.

4 WHSL PERSONNEL TRAINING

The WHSL provides special waste training to all employees specific to their responsibilities in the hazardous waste exclusion program. WHSL personnel involved in disposal operations are trained in the recognition, identification, and handling of hazardous waste, PCB waste, and unacceptable waste. Training will also include safety precautions and the proper use of personal protective equipment (as required and emergency response procedures), typical hazardous waste labels and container identification, and the necessary notification and record-keeping requirements associated with the hazardous waste exclusion program.

Upon completion of the training, each employee will sign and date a Hazardous Waste Exclusion Program Training acknowledgment form. All training records are maintained on-site in the WHSL Operating Record/Files.

5 SPECIAL WASTE ACCEPTANCE PROGRAM

All special waste materials must be pre-approved prior to acceptance at the WHSL. Generators are required to properly characterize their waste through analysis and/or process knowledge to determine if the waste is non-hazardous. After the waste has been characterized, the generator completes a *Generator's Waste Profile Sheet* (Attachment A) for submittal to the landfill. The generator is also required to sign a *Disposer's Indemnification Agreement*, which certifies as to the truth, completeness, and accuracy of the information provided (Attachment A).

5.1 Special Waste Evaluation

Information about the waste and its process of generation, along with laboratory analyses, or other information, such as Material Safety Data Sheets (MSDS) are required as part of the waste profile submittal. All profile sheets, laboratory analyses, and supporting documentation are reviewed and evaluated by a WM Waste Approvals Manager. The use of process/generator knowledge may be utilized to modify or reduce the analytical testing required for a given waste stream. Factors considered include state regulations, the process by which the waste was generated, its physical and chemical properties, its volume, and its method of packaging.

Certain special waste streams may also require individual approval by the Hawai'i Department of Health or the County of Hawai'i. Any required special management / handling of the waste (to ensure compliance with permit conditions and regulations) will be noted by the Waste Approvals Manager on the waste approval form.

Generators of special waste are required to re-analyze their waste every three years (after the approval date), or when there is a change in the process or chemical make up of the product or waste stream. This requirement is needed to ensure that the waste has not significantly changed from the initial characterization.

5.2 Special Waste Receiving and Verification

The WHSL must be notified 24 hours prior to the actual receipt of a waste that requires special handling so the waste load can be logged in (generator, hauler, type of waste & handling code, quantity [weight], etc.) on a daily special waste schedule. Special wastes are accepted for disposal at the WHSL between the hours of 7 am & 12 pm, Monday through Friday.

A Non-Hazardous Waste Manifest must accompany all special waste loads. Upon arrival at the WHSL, the scale house attendant will check the waste manifest against the schedule for approved special waste profile sheet. The waste being delivered must be the same as that described on the profile sheet. Customers are required by contract to identify any material changes in the waste stream or the process generating the waste that might affect the status of the approval. The WHSL reserves the right to inspect or sample any load in order to verify that the load conforms to the information provided by the generator. Undocumented special waste loads or loads that are not consistent with the approved profile will be rejected.

6 EXCLUDING UNACCEPTABLE & HAZARDOUS WASTE

Procedures implemented at the WHSL to detect and control the inadvertent receipt of hazardous and other unacceptable waste include notification, on-going visual monitoring, and random load checks.

6.1 Notification

WHSL customers are informed of wastes prohibited from disposal at the landfill by means of published information and/or sign(s) posted at the facility. A one-page flyer or handout is available to the general public and WHSL customers, which describes the landfill's waste acceptance policy and provides a list of acceptable and unacceptable wastes. The WHSL also communicates with local transporters, generators, and state agencies regarding waste management issues.

6.2 Ongoing Visual Screening

All incoming waste is subject to visual screening. Visual screening begins at the scale house. The scale house attendant questions incoming customers about the contents and source of their load. Cameras are set up at the scale house to allow for visual examination of a truck's load. If the scale house attendant encounters a suspicious-looking load, WHSL Management will be called for further evaluation of the load.

Suspicious, questionable waste loads or customers who have a history of attempting to deliver inappropriate material to the landfill may also be inspected. If unacceptable wastes are detected by the scale house, the attendant will reject the load and direct the transporter to seek appropriate resources for proper disposal of the rejected waste. The scale house attendant must notify WHSL Management so the incident can be documented in the *WHSL Daily Log Book*.

WHSL equipment operators and traffic controllers at the landfill working face also observe and monitor disposal operations for hazardous & other unacceptable wastes. Should wastes that contain suspicious-looking materials be observed, the WHSL Foreman or Site Manager will be called upon to determine the acceptability of the waste. If unacceptable wastes are detected at the working face, the procedures listed in Section 6.0 will be followed.

6.3 Random Load Checks

Random load checks are conducted at the WHSL by the lead operator (County of Hawai'i employee) at the working face in order to detect unacceptable wastes, such as hazardous waste, tires, batteries, PCB waste, CFC-containing appliances, etc. One random load check is performed daily. All waste loads brought to the WHSL are subject to random load checks (5 per month).

6.3.1 Random Load Check Procedures

A load will be selected for inspection at random by the scale house attendant and the driver will be notified at the scale house. The scale house attendant will notify WHSL Operations personnel via two-way radio. The randomly selected transporter will then be directed to a designated area of the working face, marked by traffic cones, and out of the way of truck traffic. Prior to the load check, a WHSL operator will give the driver/transporter a brief explanation of the load check program, and then instruct the driver to pull forward while dumping so the waste load can be adequately inspected for the presence of hazardous or other unacceptable wastes.

If unacceptable wastes are identified during a load check, the prohibited portion will be rejected. If hazardous or PCB wastes are detected, the entire load will be rejected and the generator will be notified. Arrangements will be made with the generator to have the waste retrieved or otherwise properly managed (transporters / generators will be directed to appropriate state or local agencies or vendors, for assistance in finding appropriate handling or disposal of their wastes).

Information such as the date and time of inspection, transporter information (vehicle license plate number, name, phone number, type of vehicle), generator information (source of the load as stated by the driver), description of the load, and actions taken are recorded on a *Load Check Data Sheet* (Attachment B). At the end of the inspection, both the driver and the WHSL operator sign the load check sheet. These sheets are maintained on-site as part of the WHSL Operating Record/Files.

7 ON-SITE MANAGEMENT OF WASTE

The following procedures are implemented at the WHSL when unacceptable waste is detected:

- (1) If the waste has not been unloaded, reject the load and notify the generator/transporter that unacceptable waste was in the load. Document the incident in the *WHSL Daily Log Book*.
 - (a) If it is a hazardous waste or PCB waste, follow the notification procedures listed in Section 6.3.
- (2) If the waste has been unloaded (i.e. the waste cannot be returned to the transporter), segregate or cordon off the material. WHSL personnel will decide if the waste can be handled/managed on-site (i.e. hazardous vs. non-hazardous):
 - (a) If the material is a hazardous waste, segregate or cordon off the material to establish a safe zone. Other vehicles will be directed to dump in another location.
 - i.) The WHSL will contact the generator so they can coordinate a qualified contractor to undertake proper management methods (see Section 6.2.2).
 - ii.) Follow notification procedures in Section 6.3.
 - (b) If the waste material is unacceptable but non-hazardous (tires, vehicle batteries, compressed gas tanks, white goods,) it will be managed in a manner appropriate to the risks of handling/storing the material (see Section 6.2.1).

If the characteristics of the waste are unknown, the procedures detailed in (2)(a) should be followed. Handling and management procedures will be determined on a case-by-case basis in consultation with experienced personnel and/or agencies.

7.1 Hazardous Waste Management

In the event a generator cannot effect the removal of a delivered load determined to be unacceptable/hazardous, the WHSL will contact a licensed contractor to respond to and manage the removal and disposal of the load. Hazardous wastes will be removed from the site by a licensed hazardous waste transporter under proper manifesting, and disposed or treated at a permitted facility. Anyone transporting hazardous waste from the landfill must comply with 40 CFR §262, and is required to:

- Obtain an EPA identification number.
- Package the waste in accordance with Department of Transportation (DOT) regulations under 49 CFR §173, 178, and 179. The container must be labeled, marked, and a placard must be displayed in accordance with DOT regulations for hazardous waste materials (49 CFR §172).

- Properly manifest the waste designating a permitted facility to treat, store, or dispose of the hazardous waste.

7.2 On-site Storage of Waste

7.2.1 Unacceptable Waste Storage

If the waste(s) are determined to be unacceptable *but non-hazardous* (tires, compressed gas tanks, white goods), WHSL personnel will transport the waste(s) to the designated materials storage area. The waste will be identified, logged, placed in bins or separated onto pallets, labeled, and stored until a contractor transports the waste off-site for proper disposal as required by Federal and State regulations.

7.2.2 Hazardous Waste Storage

Hazardous wastes may be stored at the WHSL for 90 days, provided that the procedures required by 40 CFR §262.34, are followed:

- The waste is placed in tanks or containers.
- The date of receipt of the waste is clearly marked and visible on the container.
- The container is clearly marked with the words "Hazardous Waste".
- The employee designated as the emergency coordinator is responsible for coordinating all emergency response measures.
- The name and telephone number of the emergency coordinator and the number of the fire department is posted next to the facility phone. Emergency response telephone numbers are posted throughout the site.

7.3 Agency Notification

If a regulated hazardous waste or PCB waste is detected during a random load check or at the WHSL, a written report will be sent to the DOH Solid and Hazardous Waste Branch within 24 hours, or the next working day. The report will include the following information:

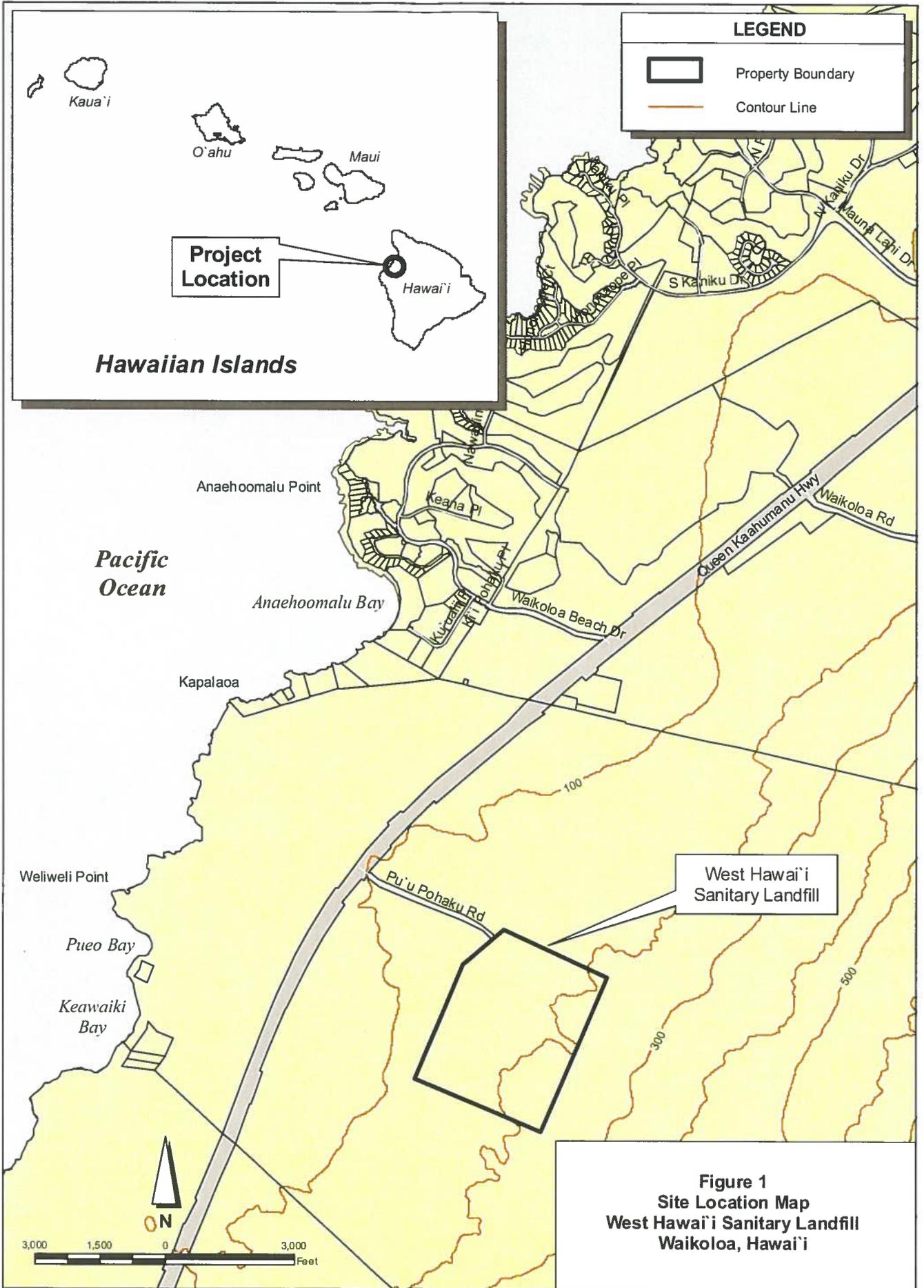
- Date of detection.
- Type and volume of waste.
- Generator and transporter, if known.
- Any environmental or safety issues and/or mitigation measures conducted.
- Anticipated or final disposition of waste.

8 RECORD KEEPING

The following records are maintained on-site as part of the WHSL Site Operating Record/Files that relate to the *WHSL Waste Acceptance / Hazardous Waste Exclusion Program*:

- a. Records of employee training in the prevention, detection, and management of acceptable and unacceptable wastes, including hazardous waste and PCBs.
- b. Records documenting results of random load checks and rejected loads.
- c. Records of special waste approvals, special waste schedules, approvals with conditions, and rejections.
- d. Records of hazardous and unacceptable wastes found at the facility where the generator is unknown, and anticipated or final disposition of waste.
- e. Agency correspondence and notifications.

FIGURES



APPENDIX A:

ASBESTOS MANAGEMENT & DISPOSAL PLAN

ASBESTOS MANAGEMENT & DISPOSAL PLAN
WEST HAWAI'I SANITARY LANDFILL
WAIKOLOA, HAWAI'I



PREPARED BY
WASTE MANAGEMENT OF HAWAII, INC.
APRIL 2008

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1 INTRODUCTION

In accordance with the requirements of the Code of Federal Regulations (CFR) 1910.1001 "Asbestos", 40 CFR Subpart M "National Emission Standard for Hazardous Air Pollutants (NESHAP [Asbestos])" 61.154 "Standard for active waste disposal sites", and the Hawai'i Administrative Rules (HAR) Title 11, Chapters 501 through 504, Waste Management of Hawaii (WMH) has implemented this *Asbestos Management & Disposal Plan* at the West Hawai'i Sanitary Landfill (WHSL) in order to provide site-specific guidelines for the safe management and disposal of asbestos-containing materials (ACM), and to describe procedures utilized to minimize potential exposure to asbestos or ACM at the site.

2 DEFINITIONS

- **Asbestos** – There are two general forms of asbestos:
 1. ***“Friable asbestos materials”*** contain more than 1% asbestos (as determined by 40 CFR 763), and when dry, can be crumbled, pulverized, or reduced to powder by hand.

Dry, friable asbestos becomes an inhalation hazard when it is broken up or damaged because asbestos fibers are released into the air. Some examples of friable asbestos materials are sprayed-on acoustic ceiling material and ceiling tiles, pipe and duct insulation, insulating boards, and insulating textiles.

2. ***“Non-friable asbestos-containing materials”*** contain more than 1% asbestos, as determined (as determined by 40 CFR 763), and when dry, cannot be crumbled, pulverized, or reduced to powder by hand.

Dry, non-friable asbestos materials are not likely to release asbestos fibers because the fibers have been bound in a tight matrix. Only sanding or cutting this type of material could release asbestos fibers. Materials such as floor tile, sheet vinyl flooring, roof felts, asphalt tiles, ceiling tiles and caulking are considered non-friable forms of asbestos, unless they are or will be damaged during demolition or renovation activities.

- **Excursion Limit (EL)** – The 30-minute time weighted average airborne concentration of asbestos (1 fiber per cubic centimeter) to which no employee shall be exposed.
- **Permissible exposure limit (PEL)** – The 8-hour time weighted average airborne concentration of asbestos (0.1 fiber per cubic centimeter) above which no employee shall be exposed.

3 WHSL PERSONNEL AND TRAINING

It is the responsibility of all WHSL personnel to follow the work practices/requirements of this Plan. WHSL personnel involved with asbestos management and disposal operations and/or have waste screening responsibilities are trained annually on the following topics:

- Health effects associated with asbestos exposure
- Relationship between smoking and exposure to asbestos, producing lung cancer and access to smoking cessation programs
- Quantity, location, manner of use, release, and storage of asbestos, and the specific nature of operations that could result in exposure to asbestos
- Engineering controls and work practices associated with the employee's job assignment
- Specific procedures implemented to protect employees from exposure to asbestos, such as appropriate work practices, emergency and clean-up procedures, and personal protective equipment (PPE) to be used
- Purpose, proper use, and limitations of respirators and protective clothing
- Purpose and description of the medical surveillance program
- Content of the OSHA asbestos regulations, including the appendices
- Labeling and signage requirements

The following documentation is maintained for each WHSL employee on-site, as part of the WHSL Operating Record/Files:

- Medical and health surveillance records (retained for employees working history plus 30 years).
- Training records (retained for a minimum of one year after the end of employment).

4 HEALTH SURVEILLANCE

4.1 Exposure Monitoring

Past air monitoring activities at the WHSL demonstrated that ACM disposal operations do not result in exposures to airborne concentrations of asbestos fibers at or above the PEL or EL (WHSL operations personnel do not handle or offload ACM waste). Therefore, WHSL personnel are not required to wear Level C PPE (air-purifying respiratory protection and disposable body covering). WHSL personnel wear only standard, Level D safety apparel (hard hat, safety vest, steel toes, steel shank boots).

If necessary, the WHSL will ensure that any potential employee exposure to ACM at or above the PEL will result in the initiation of a respiratory protection program in accordance with applicable regulations.

4.2 Medical Surveillance

WMH institutes a medical surveillance program for WHSL operations personnel, even though they are not exposed to asbestos above the PEL. This program consists of pre-employment, post-employment, and annual physical medical examinations. All exams and procedures are performed by or under the supervision of a licensed physician under the medical surveillance provisions of the applicable standard.

5 ACM DISPOSAL AREA

The perimeter of the WHSL property is fenced along the Queen Kaahumanu Highway entrance and protected by a natural barrier along all other sidelines to adequately deter non-authorized public access. Asbestos is disposed at the WHSL by creating disposal areas separate from the daily MSW. These designated disposal areas follow Leachate collection lines (R-1, R-2, and R-3). The active ACM disposal area is a controlled area and access is restricted to authorized personnel and approved customers. This area of the landfill is the only reasonably anticipated area of any exposure, however, since exposures have not been found to be at or above the PEL or EL, the area is not considered an OSHA regulated area. In areas that may pose a potential for exposure to asbestos at or above the PEL or EL, OSHA regulated areas shall be established.

When an asbestos load is scheduled for disposal at the WHSL, the designated disposal area is prepared by WHSL personnel, and temporary warning signs to identify and restrict access to the disposal location are clearly posted. In accordance with regulatory requirements, the temporary warning signs (20"x 14", with a yellow background and black appropriately sized letters/fonts) display the following:

ASBESTOS WASTE DISPOSAL SITE

DO NOT CREATE DUST

BREATHING ASBESTOS DUST IS HAZARDOUS TO YOUR HEALTH

WHSL employees who work with or near ACM must wash prior to eating, drinking, smoking, or chewing tobacco or gum, and employees are not to engage in these activities in an area where asbestos waste is being disposed.

6 PRE-DISPOSAL PROCEDURES

- In accordance with the Special Waste Guidance Manual requirements for approvals and appointments, 40 CFR part 61 subpart M (NESHAP), 29 CFR 1910.1001 (OSHA), and 49 CFR 100-199 (DOT), a *Generator's Waste Profile Sheet* and Waste Shipment Record must be completed by the generator and submitted to the WHSL for approval prior to transporting ACM to the site.
- Upon approval for acceptance, at least 24-hours advance notice must be given by the generator/hauler before ACM can be delivered to the site. Coordination for ACM disposal is handled by the County of Hawai'i. ACM is accepted from 7 am – 12 pm, Monday through Friday.
- Each incoming asbestos load must be accompanied by properly completed documentation. All asbestos waste loads are verified prior to disposal. The scale house attendant weighs all ACM loads and checks that the ACM is properly packaged and labeled. *All asbestos-containing waste is required to be contained in metal or plastic drums or barrels, or be double-wrapped or double-bagged in six millimeter-thick (minimum) plastic. The generator/hauler is responsible for providing proper packaging and labeling of the ACM. Certain ACM, such as concrete pipe, may make use of packaging alternatives that meet OSHA and NESHAP requirements. Void space within the packaging should be minimized to reduce the potential for puncturing the plastic and causing airborne emissions.*
- The scale house attendant will then check the quantity of the ACM designated on the waste shipping papers vs. the quantity actually received. Attempts will be made to reconcile quantity discrepancies, if any, with the generator, so that reportable discrepancies do not occur.
- The scale house attendant will direct the transporter to the landfill working face, and notify WHSL operators via two-way radio so that a disposal trench can be excavated (i.e. the designated disposal area).

7 ASBESTOS DISPOSAL PROCEDURES

WHSL equipment operators oversee the unloading of ACM at the designated disposal area. All asbestos loads are visually inspected prior to being unloaded, to ensure all packaging and labeling requirements are met. Improper packaging includes torn bags, broken or unsealed containers, or any loose material visible in the load. If the asbestos load is not properly contained, it must be wetted prior to unloading to prevent any potential asbestos particulates from becoming airborne. If significant tearing of the plastic wrapping is noted, the customer may be required to re-wrap and properly seal the waste prior to unloading. WHSL personnel have the right to reject ACM loads that are improperly packaged and/or labeled.

Following the visual inspection, WHSL personnel will determine the method by which ACM will be unloaded. The method used shall minimize the risk of rupture to containers or bags. The asbestos load will be placed in a trench, pit or otherwise pre-prepared area at the designated disposal area. If possible, trenches will be cut perpendicular to the prevailing wind. Trenches should be cut in an area that is at least 100 feet away from other site activities. The trench should not be within 10 feet of the perimeter or the side slopes of any fill area, or within 10 feet of the base of any final cover.

The hauler is directed (by the operator or traffic controller) to dump their load directly into the trench/pit, and reminded not to break the seal on any containers, or rupture any bags. **UNDER NO CIRCUMSTANCES ARE WHSL PERSONNEL ALLOWED TO HANDLE OR UNLOAD ANY ACM - UNLOADING IS PERFORMED BY THE HAULER.** There must be no visible asbestos emissions to the outside air from any active waste disposal site where asbestos-containing waste material have been deposited. The disposal trench is covered with 24" of MSW immediately after dumping, and daily cover at the end of the day. In order to maintain the integrity of the double wrapping, asbestos waste is not directly compacted or otherwise disturbed by equipment after being unloaded.

The WHSL utilizes the leachate collection lines R-1, R-2, and R-3 as coordinates for the disposal of asbestos. In addition, a handheld global positioning system (GPS) is used to obtain X-Y coordinates (latitude-longitude) and elevations of ACM disposal locations.

8 ASBESTOS EMERGENCY RESPONSE PROCEDURES

The emergency procedures listed below will be implemented if asbestos fibers become airborne (due to a rupture or breach in the integrity of a bag/container) above the PEL or EL in an uncontrolled manner. **WHSL OPERATORS WILL NOT HANDLE, RELOCATE, OR REPAIR ANY IMPROPERLY PACKAGED ACM CONTAINERS.**

1. All landfill operations will cease within 100 feet of the release until the area is remediated.
 - If there is a tear in a bag or container at the designated disposal area, the equipment operator will immediately cover the material with at least 15 centimeters (6 inches) of compacted non-ACM (cover soil) or a minimum of 2 feet of MSW. The material may be remotely (50 to 100 ft and upwind from the release) wetted prior to covering.
 - If there is a spill or release of friable asbestos outside of the designated disposal area, the following actions will be taken:
 - ❑ Cease all disposal operations and evacuate all personnel/landfill customers to an upwind location.
 - ❑ Notify WHSL management immediately.
 - ❑ Prevent and control access to the location of the release and downwind areas until clean up is complete.
 - ❑ Quantify the release and identify potential receptors.
 - ❑ Contact local hazardous material emergency response company to complete appropriate response actions (i.e. air or waste sampling, designate safe zones, remediate the spill, and dispose of contaminated media). The spilled ACM shall be double-bagged/containerized and properly labeled and sealed. The bag will then be placed in an excavated disposal trench.
 - ❑ Ensure that the emergency response company cleans any WHSL equipment that may have been contaminated by the release.
 - ❑ Notify agency(s) as required.
 - The Reportable Quantity (RQ) for asbestos = 1 pound (of actual asbestos, not just ACM). Call the National Response Center @ (800) 424-8802.

Although an off-site abatement contractor would be called in to deal with an emergency, on-site personnel will be part of the initial response. In the event of a ruptured ACM bag, WHSL personnel will take immediate action to contain the release and prevent unnecessary exposures. Any WHSL personnel that enter the regulated area must wear a respirator, be medically qualified, and will have been properly trained (complete "first responder operations level" training [8 hours plus annual refresher]), and fit-tested.

9 REPORTING REQUIREMENTS

The WHSL maintains the following information for all ACM waste shipments received at the landfill.

1. Waste shipment records documenting:
 - a. *The name, address, and telephone number of the generator.*
 - b. *The name, address, and telephone number of the transporter(s).*
 - c. *The quantity of the asbestos-containing waste material in cubic yards. The scale at the WHSL records asbestos loads in tons, and the tonnage is then converted into cubic yards.*
 - d. *If a significant amount of improperly packaged ACM is brought to the landfill, written notification (and a copy of the waste shipment record) will be submitted to the DOH by the next working day.*
 - e. *Disposal date.*
2. A copy of the signed waste shipment record is sent back to the generator as soon as possible, and no longer than 30 days after receipt of the ACM.
3. Any discrepancies in the quantity of ACM received vs. the quantity designated on a waste shipment record will be reconciled with the generator. If the discrepancy is not resolved within 15 days after receiving the waste, written notification describing the issue and a copy of the waste shipment record will be submitted to the DOH immediately.
4. Copies of all required records and reports are maintained on-site as part of the WHSL's Operating Record/Files for at least 2 years. All ACM disposal location and quantity (yards³) records are maintained until closure.

10 ASBESTOS EXCAVATION

The DOH Clean Air Branch (CAB) & United States Environmental Protection Agency (USEPA) will be notified, in writing, at least 45 days prior to excavating or disturbing any ACM that has been landfilled. The notification will include:

- Scheduled starting and completion dates.
- Reason for disturbance of waste.
- Procedures that will be used to control emissions during excavation, storage, transfer, & final disposal of the excavated ACM.
- The temporary storage location of the ACM and its final disposition.

If any changes are made to the scheduled start date or completion date, the WHSL will re-notify the DOH CAB and the USEPA at least 10 days prior to the scheduled change.

APPENDIX B:
REFRIGERANT MANAGEMENT PLAN

**REFRIGERANT MANAGEMENT PLAN
WEST HAWAI'I SANITARY LANDFILL
WAIKOLOA, HAWAI'I**



**PREPARED BY
WASTE MANAGEMENT OF HAWAII, INC.
APRIL 2008**

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1 OVERVIEW

Title VI (Stratospheric Ozone Protection) of the November 15, 1990 Amendment to the Clean Air Act (Public Law 101-549) monitors ozone-depleting substances (ODS) such as chlorofluorocarbons (CFCs) through regulatory and voluntary programs. CFCs are used primarily as refrigerant for air conditioners, freezers, and refrigeration equipment in buildings, homes, supermarkets, and automobiles. Sections within Title VI cover the production of these ozone-depleting chemicals; the recycling and handling requirements associated with them; bans on intentional venting or releasing of CFCs during maintenance, service, repair, or disposal activities; the evaluation of substitutes; and efforts to educate the public.

2 PURPOSE

The United States Environmental Protection Agency (USEPA) has issued numerous federal regulations concerning the protection of stratospheric ozone. These include equipment certification requirements, maintenance and service practices, refrigerant reclaiming requirements, training, and record keeping on the purchase, use, sale, transfer, and disposal of these substances. This Refrigerant Management Plan has been prepared for the West Hawai'i Sanitary Landfill (WHSL) by Waste Management of Hawaii, Inc. (WMH) to ensure compliance with 40 CFR Part 82, Subpart B & F – *Management & Disposal of Freon (CFCs) Containing Appliances*.

3 FACILITY ACTIVITIES

The WHSL does **not** accept items or appliances that contain refrigerants (i.e. commercial or residential refrigerators, air conditioners, or freezers). WHSL employees are trained in the proper management of refrigerant-containing appliances.

At the WHSL, all incoming waste is subject to ongoing visual screening which begins at the scale house and also includes random and select load checks. WHSL operators are trained to monitor incoming waste loads as they are tipped at the landfill working face. If a hauler/customer is observed bringing refrigerant-containing appliances into the landfill, WHSL personnel will direct the customer not to unload the item(s) and refer them to the proper County convenience centers or scrap metal yard. Commercial refrigerant-containing appliances must be properly emptied of refrigerants, per USEPA and State of Hawai'i Department of Health requirements, prior to being accepted by the scrap metal yard.

In a situation where refrigerant-containing items are discovered at the working face and the hauler/landfill customer cannot be identified, WHSL personnel will remove the item(s) from the active disposal area and transfer them to the designated unacceptable waste storage location where the item(s) are inventoried. This location is away from normal traffic flow and allows for a safe storage environment. The unacceptable waste storage location is monitored during routine site inspections.

4 REFRIGERANT REMOVAL

WHSL personnel do not conduct refrigerant removal. Since items/appliances discovered at the working face may or may not have undergone prior refrigerant removal, WHSL employees are instructed to handle them as if they contain refrigerant. Adequate care is taken to ensure the items/appliances are handled in a manner that prevents any damage to the refrigerant system.

Refrigerant-containing items are removed from the unacceptable waste storage location by a certified contractor working under the direction of the County of Hawai'i and transported off-site to the scrap metal contractor, who properly removes the refrigerant and then properly recycles the appliance.

When necessary to conduct refrigerant removal at the landfill, a certified contractor is hired to perform the removal. The contractor will assume all responsibility for the proper management of the refrigerant.

5 TRAINING & RECORD KEEPING

WHSL operations personnel are trained in the proper management of refrigerant containing appliances and are instructed to carefully remove these items from the landfill. Documentation of training sessions conducted is maintained on-site in the WHSL Site Operating Record / Files.

Refrigerant-containing items recovered from the working face are inventoried on the *WHSL Daily Operations Log*. No other record keeping is required by this plan or the USEPA unless the facility begins managing refrigerant recovery operations.

6 RELEASE REPORTING

In the event of a refrigerant release/spill, the WHSL Site Manager will record the incident in the facility's operating files. The WMH Environmental Protection Manager will work with the WHSL Site Manager to notify the appropriate agencies if reportable spills and/or releases occur on-site.

APPENDIX C:
ELECTRONIC WASTE

**ELECTRONIC WASTE PLAN
WEST HAWAI'I SANITARY LANDFILL
WAIKOLOA, HAWAI'I**



**PREPARED BY
WASTE MANAGEMENT OF HAWAII, INC.
APRIL 2008**

HAZARDOUS WASTE EXCLUSION PLAN – ELECTRONIC WASTE

Federal and State laws prohibit the disposal of hazardous wastes at solid waste landfills. To ensure protection of human health and the environment, the West Hawaii Sanitary Landfill (WHSL) and Waste Management of Hawaii (WMH) have developed and implemented a program for detecting and preventing the disposal of these regulated hazardous wastes.

One of these programs is the WHSL Hazardous Waste Exclusion Program. This program requires the generator of a commercial/industrial waste stream to properly characterize the waste and complete a special waste profile. Only waste characterized as non-hazardous can be accepted for disposal. While this requirement has and will continue to apply to electronic wastes (e-waste), WMH is submitting an amended hazardous waste exclusion plan to further describe e-wastes. A summary of the changes are found below:

Electronic Wastes:

E-waste is increasing in volume and contains substances such as lead, mercury, and PCBs that can pollute air and water. The US Environmental Protection Agency (USEPA) has defined e-waste as:

“...electronic products being discarded by consumers. These include a wide range of items, such as: televisions; computers and computer peripherals; audio and stereo equipment; VCRs and DVD players; video cameras; telephones; cellular phones and other wireless devices; fax machines; copy machines; and video game consoles.”

As stated in a June 9, 2006 letter from the State of Hawai'i Department of Health (DOH) to the City & County of Honolulu, recent studies have indicated that some electronic wastes have tested as hazardous, (“Based on studies conducted by the USEPA, the CRTs [Cathode Ray Tubes] and LCDs [Liquid Crystal Displays] will fail the Toxicity Characteristic Leaching Procedure (TCLP) test for heavy metals such as lead, mercury, and cadmium”).

Additionally, recent testing conducted on other e-wastes in California suggests that non-CRT electronic materials can exhibit the characteristic of hazardous waste. E-waste items such as CPUs, printers, cell phones, radios, and VCRs tested above RCRA hazardous waste levels for lead.

http://www.dtsc.ca.gov/HazardousWaste/EWaste/upload/HWMP_REP_SB20_LCD.pdf

As a company, Waste Management strongly encourages customers to consider donating working electronics to organizations in need. Recycling of these devices is the best course of action if possible.

E-Waste Disposal:

Commercial/business generators of computer and television monitors are subject to the hazardous waste laws and must make a hazardous waste determination by one of three ways:

- Determine if the waste is listed under Hawai'i Administrative Rules 11-261;
- Test for hazardous waste constituents under the Toxicity Characteristic Leaching Procedure (TCLP); or

- Use generator knowledge of the waste.

The WHSL has determined that there is adequate empirical evidence to suggest that CRTs (from computer monitors/televisions), LCDs (from flat screen panels, plasma screens, and laptops) are hazardous wastes. These items are prohibited from disposal at the landfill. Signs will be posted at the entrance to the facility to indicate these are prohibited. WHSL employees and County of Hawai'i scale house personnel will be trained regarding this restriction.

Commercial/business shipments containing e-waste suspected of being a regulated hazardous waste will be prohibited for disposal unless TCLP data is submitted which supports the non-hazardous classification made by the generator.

Household E-Waste Exemption:

Used CRTs and LCDs generated by households are not considered hazardous waste and are not regulated under federal regulations. 40 CFR 261.4 (b)(1):

b) Solid wastes which are not hazardous wastes. The following solid wastes are not hazardous wastes:

(1) Household waste, including household waste that has been collected, transported, stored, treated, disposed, recovered (e.g., refuse-derived fuel) or reused. "Household waste" means any material (including garbage, trash and sanitary wastes in septic tanks) derived from households (including single and multiple residences, hotels and motels, bunkhouses, ranger stations, crew quarters, campgrounds, picnic grounds and day-use recreation areas).

***Note (1) above applies only to residents of the facilities listed above and should not be construed to mean the commercial or government entities controlling the listed facilities.**

CRTs and other e-wastes discovered in non-bulk shipments from residential sources will not be excluded from disposal. These devices will be presumed to be from households and therefore exempt from federal hazardous waste disposal restrictions and will not be removed from the landfill as long as they are delivered in household quantities (one per household). The County of Hawai'i anticipates an e-waste recycling drop off center will be established in Kailua-Kona, at which the point e-waste acceptance policy at the WHSL may be changed.

Conditionally Exempt Small Quantity Generators:

Businesses and other organizations that discard less than 100 kilograms (about 220 pounds) per month of hazardous waste (including e-waste) are considered conditionally exempt small quantity generators (CESQG). CESQGs are not regulated under most federal requirements (See 40 CFR 261.5).

However, in order to apply this exemption, WMH and the WHSL must rely on the generator to appropriately monitor and apply the correct generator status. Therefore, only e-waste shipments accompanied by a statement certifying the material was generated by a CESQG will be accepted. Copies of the statement will be maintained on site.

E-waste that has been properly tested and profiled may be accepted from commercial/industrial sources.

ATTACHMENT A:
GENERATOR'S WASTE PROFILE SHEET
&
DISPOSER'S INDEMNIFICATION AGREEMENT

GENERATOR'S WASTE PROFILE SHEET
PLEASE PRINT IN INK OR TYPE

Profile Number: WMI _____

- d. Reportable Quantity (lbs; kgs.): _____ e. Hazard Class/ID#: _____
 f. USDOT Shipping Name: _____
 g. Personal Protective Equipment Requirements: _____
 h. Transporter/Transfer Station: _____

C. Generator's Certification (Please check appropriate responses, sign and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2. YES NO
 - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) _____
 - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (If yes, list in Section B.1.j) YES NO
 - c. Does this waste contain debris? (If yes, list size and type in Chemical Composition - B.1.) YES NO
2. Is this a state hazardous waste _____ YES NO
Identify ALL state hazardous waste codes _____
3. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up? YES NO
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up Activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal Regulated by the Nuclear Regulatory Commission? YES NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (If yes, list in Chemical Composition - B.1.j) YES NO
 - a. If yes, were the PCBs imported into the U.S.? YES NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste Material, and has all relevant information within the possession of the Generator regarding known or Suspected hazards pertaining to the waste been disclosed to the Contractor? YES NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor? YES NO

Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: _____ Title: _____
 Name (Type or Print): _____ Company Name: _____ Date: _____
 Check if additional information is attached. Indicate the number of attached pages _____

D. WMI Management's Decision	FOR WMI USE ONLY
1. Management Method <input type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____	
2. Proposed Ultimate Management Facility: _____	
3. Precautions, Special Handling Procedures, or Limitation on Approval: _____ _____ _____	
Special Waste Decision _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Salesperson's Signature: _____ Date: _____	
Division Approval Signature (Optional): _____ Date: _____	
Special Waste Approvals Person Signature: _____ Date: _____	

**DISPOSER'S INDEMNIFICATION
AGREEMENT REGARDING DISPOSAL
OF NON-HAZARDOUS WASTES**

_____ warrants that all wastes that are directed to WEST HAWAI'I SANITARY LANDFILL for disposal are non-hazardous wastes as defined by all applicable federal, state and local laws, rules, regulations, permits, and administrative and judicial decisions.

In order that we may continue to service you, please acknowledge your receipt and comprehension of this letter by having an officer or an authorized signature places in the space provided below and return this letter as soon as possible.

Should you determine that you transport or generate a hazardous waste, we would welcome the opportunity to assist you through the services of our affiliated hazardous waste companies.

Date

Company Name

Officer or Agent (print or type)

Signature of Officer or Agent

Title of Officer or Agent

Witness

ATTACHMENT B:
LOAD CHECK DATA SHEET

Inspection Type:	
Date _____	Time _____
Random _____	Requested _____
Transporter Information:	
Hauling Firm or Vehicle Owner _____	_____
Telephone Number _____	_____
Type Of Vehicle _____	_____
License Plate No. / Truck No. _____	_____
Driver's Name _____	_____
Print Name _____	_____
Signature _____	_____
Origin of Load / Generator Information:	
Industrial _____	Commercial _____
Source _____	_____
Waste Description:	
_____	_____
_____	_____
Action Taken (check one):	
a) Load Accepted (No Hazardous/Unacceptable Waste) _____	_____
b) Entire load rejected* _____	Why? _____
c) Partial load rejected* _____	Why? _____
*If load was rejected, who was notified (transporter, generator, WGSL personnel?) _____	
d) Household Hazardous Waste Collected _____	
Describe: _____	
Inspector: Print Name _____	
Signature _____	

Inspection Type:	
Date _____	Time _____
Random _____	Requested _____
Transporter Information:	
Hauling Firm or Vehicle Owner _____	_____
Telephone Number _____	_____
Type Of Vehicle _____	_____
License Plate No. / Truck No. _____	_____
Driver's Name _____	_____
Print Name _____	_____
Signature _____	_____
Origin of Load / Generator Information:	
Industrial _____	Commercial _____
Source _____	_____
Waste Description:	
_____	_____
_____	_____
Action Taken (check one):	
a) Load Accepted (No Hazardous/Unacceptable Waste) _____	_____
b) Entire load rejected* _____	Why? _____
c) Partial load rejected* _____	Why? _____
*If load was rejected, who was notified (transporter, generator, WGSL personnel?) _____	
d) Household Hazardous Waste Collected _____	
Describe: _____	
Inspector: Print Name _____	
Signature _____	

ATTACHMENT C:

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR CERTIFICATION



WASTE MANAGEMENT, INC.

West Hawai`i Sanitary Landfill

71-1111 Queen Kaahumanu Highway

Waikoloa, Hawai`i 96738

**Conditionally Exempt Small Quantity Generator
Certification**

_____, certifies to any interested parties, that we are a Conditionally Exempt Small Quantity Generator (CESQG) based on conditions specified in 40 CFR 261.5, Resource Conservation and Recovery Act (RCRA). We certify that we:

1. generate no more than 100 kilograms (Kg) (220 pounds) in one calendar month, of RCRA regulated hazardous waste in one calendar month.
2. generate no more than 1 Kg (2.2 pounds) of acutely hazardous waste as per RCRA.
3. did not exceed the storage limits of 1,000 Kg (2,200 pounds) of RCRA regulated hazardous waste at any one time.

Authorized Representative Signature

Title

Business/Organization

Date