

# **Appendix B. Waste and Spill Management Specifications**



# **Waste and Spill Management Specifications**



FERC Docket No. CP09-54-000

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## List of Abbreviations and Acronyms

BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DOT	Department of Transportation
EPA	U.S. Environmental Protection Agency
Project	Ruby Pipeline Project
ROW	Right-of-way
Ruby	Ruby Pipeline, LLC



# 1.0 General

The Ruby Pipeline Project (Project), proposed by Ruby Pipeline, LLC (Ruby), is composed of approximately 675.2 miles of 42-inch diameter natural gas pipeline, along with associated compression and measurement facilities, located between Opal, Wyoming, and Malin, Oregon. The Project would also include an approximate 2.6-mile lateral to be constructed in Klamath County, Oregon. As proposed, the Project will have a design capacity of approximately 1.5 million Dekatherms per day, depending on final subscriptions. The Project's right-of-way (ROW) will cross four states: Wyoming, Utah, Nevada, and Oregon. In addition to the existing King Compressor Station at Opal, Wyoming, Ruby proposes to install four new compressor stations for the Project: one located near the Opal Hub, one in western Utah, one near the mid-point of the Project north of Elko, Nevada, and one northwest of Winnemucca, Nevada.

These waste and spill specifications apply to all work where waste may be generated or a spill may occur.

The Contractor will attend a pre-construction meeting to review environmental issues and requirements relating to the job prior to initiating work activities. During the pre-construction meeting, Ruby Pipeline, LLC (Ruby) will review the requirements for proper waste management, spill reporting and cleanup. The Contractor will comply with the requirements set forth below and in the contract's Scope of Work.

The Waste and Spill Management Plan Template (Attachment A) will be completed by the Contractor. The Contractor will comply with the current edition of the El Paso Pipeline Group's Environmental Handbook (Attachment B) and all applicable federal, state, and local regulations.

The Contractor will be responsible for ensuring that applicable Contractor personnel, including subcontractors, understand spill prevention procedures and how to handle, store, transport, and dispose of waste per these specifications. The Contractor will keep records of training and provide copies of such records to Ruby upon request.



## **2.0 Waste Management – Ruby Responsibilities**

### **2.1 Before Work Commences**

For all wastes anticipated to be generated as a result of the Scope of Work, Ruby will determine the classification (hazardous, non-hazardous, and special waste) of all waste generated by Ruby or the Contractor. Ruby will notify the Contractor of waste classification.

If the waste classification is unknown, Ruby will arrange for sampling to determine waste classification as early as possible, but this may occur after work has commenced.

Ruby will review and approve the Contractor's Waste Management Plan prior to the pre-construction meeting.

Ruby will conduct a pre-job meeting to review the Waste Management Plan and responsibilities and review Company authorized personnel and environmental contacts.

Ruby will make all required notifications unless otherwise specified in the Scope of Work.

### **2.2 Before Generating Waste**

Ruby will inspect all secondary containment provided by the Contractor.

Ruby will provide the U.S. Environmental Protection Agency (EPA) generator number, if necessary, for all hazardous waste generated as a result of the performance of the Scope of Work and provide a hazardous waste contingency plan if necessary.

### **2.3 During Waste Generation**

For unanticipated wastes generated during the performance of the Scope of Work, Ruby and Contractor will confer regarding classification responsibilities as soon as possible after the waste is generated. Wastes will be managed in accordance with applicable federal and state regulations. Ruby will obtain a hazardous waste EPA ID number(s) if necessary.

### **2.4 After Waste Generation**

Ruby will arrange for all hazardous wastes and special wastes generated during the performance of the Scope of Work to be transported by a licensed waste hauler to a permitted waste disposal facility.



## **3.0 Waste Management – Contractor Responsibilities**

### **3.1 Before Work Commences**

The Contractor will develop a Waste Management Plan for all wastes anticipated during the project and submit to Ruby for approval. At the discretion of Ruby, multiple similar projects may be covered under one Waste Management Plan. The work will not commence prior to obtaining Ruby's approval of the Waste Management Plan. If the Waste Management Plan addresses potentially hazardous waste or asbestos, the Contractor will have training in accordance with its own training program.

The Contractor will minimize the waste generated during a project by purchasing and using only the amount of material needed. All excess materials purchased by a Contractor will be removed by the Contractor at the end of the project.

The Contractor will furnish to Ruby copies of any permits, clearances, or authorizations obtained by Contractor.

### **3.2 Before Generating Waste**

The Contractor will be familiar with the state and local environmental requirements as necessary for the performance of the Scope of Work.

The Contractor will provide all drums (Department of Transportation [DOT] Spec. 1A1 or 1A2), roll-off boxes, or other containers necessary to contain wastes generated during the performance of work, including wastes generated in response to spill response and cleanup activities, unless otherwise specified in the Scope of Work. All containers will be approved by Ruby.

The Contractor will provide containment areas for liquids, hazardous waste, and special waste as required by the Spill Management section of these specifications. The containment will be impervious to the materials being stored. Temporary storage on the right-of-way does not require protection from weather; temporary storage will not exceed one week.

The Contractor will collect all waste near the close of each workday and will place the waste in a Ruby-approved location.

### **3.3 During Waste Generation**

The Contractor will be responsible for housekeeping activities in the work area.

The Contractor will notify Ruby prior to placing any potentially hazardous or special waste in storage so that Ruby may conduct sampling and analysis as necessary.

The Contractor will be responsible for proper packaging, labeling, marking, and storing of waste.

The Contractor will keep hazardous, non-hazardous, special, and general trash wastes separate and will not mix waste streams.

The Contractor will keep a waste log identifying Ruby facility at which the waste was generated, the volume and type of waste generated, the date generated and, where applicable, Ruby-approved location to which the waste was transported or stored. The Contractor will provide the waste log to the Authorized Ruby Representative weekly. Any waste shipped to a Ruby facility will be accompanied by a log.

For unanticipated wastes generated during the Scope of Work, Ruby and the Contractor will confer on classification responsibilities as soon as possible after the waste is generated.

If classification of a waste is unknown, all waste will be assumed to be hazardous until final classification is received from Ruby. The Contractor will label and store waste accordingly.

In accordance with the Contractor's approved Waste Management Plan, the Contractor will be responsible for the handling, storing, and transporting of non-hazardous and special wastes generated by Contractor during the performance of the contract.

Any proposed changes to the approved Waste Management Plan regarding the methods established for the handling, collecting, transporting, and storing of any waste will be submitted in writing and agreed to by both the Contractor and Ruby prior to instituting the change.

### **3.4 After Waste Generation**

The Contractor will notify Ruby personnel prior to moving any waste off site to another location.

The Contractor will be responsible for ensuring that non-hazardous and special wastes are transported by Ruby-authorized transporters only and that all waste is accompanied by the appropriate shipping papers, complete with required information and signatures. The

**Contractor is prohibited from transporting hazardous waste unless specifically authorized.**

The Contractor will submit all waste shipping papers to Ruby.

The Contractor will supply disposal containers for the general trash waste generated by the Contractor and its subcontractor; it will be transported to a disposal facility in accordance with the Waste Management Plan.



## **4.0 Spill Management – Ruby Responsibilities**

Ruby will review spill prevention and response as part of the pre-construction meetings, as discussed above.

In the event of a reportable spill or release which involve Ruby-processed products/materials (e.g., pipeline liquids, used oil, etc.), Ruby will make notify the appropriate federal and state agencies.

Ruby will provide a copy of release reports required by federal or state agencies to any jurisdictional land-management agency, concurrent with the filing of reports to the involved federal and state agencies.



## **5.0 Spill Management – Contractor Responsibilities**

The Contractor will comply with the spill prevention, control, and containment procedures set forth below and in the Scope of Work for all work undertaken during performance of the contract.

The Contractor will ensure that its personnel and subcontractors involved in the work area are aware of the spill prevention and containment responsibilities.

The Contractor will develop a list of all emergency contacts within the Contractor's and subcontractors' organization, and a description of emergency response equipment that will be provided by the Contractor for use by its employees. Emergency equipment may include, but is not limited to, shovels, backhoes, dozers, front-end loader, etc.

The Contractor will have a copy of the Material Safety Data Sheet for each chemical to be used during the Project, and it will be available for review if requested by Ruby.



## 6.0 Spill Prevention – Contractor Responsibilities

The Contractor will install lined secondary containment impervious to the material being stored (e.g., diking and/or earthen berms with liner) around liquids materials handling and storage areas to prevent spilled material from reaching the waters of the state. Areas that require containment structures include: (i) liquid and hazardous waste drum storage areas, (ii) bulk storage tanks, (iii) tanker trucks if parked at one location for more than two days, and (iv) liquids handling and operations areas on offshore facilities.

Ruby and the Contractor will structure operations in a manner that reduces the risk of spills or the accidental exposure of fuels or hazardous materials to waterbodies or wetlands. Ruby and its contractors must, at a minimum, ensure that:

- All employees handling fuels and other hazardous materials are properly trained;
- All equipment is in good operating order and inspected on a regular basis;
- Fuel trucks transporting fuel to on-site equipment travel only on approved access roads;
- All equipment is parked overnight and/or fueled at least 100 feet from a waterbody or in an upland area at least 100 feet from a wetland boundary, within 200 feet of any water supply well or spring, or within 500 feet from a waterbody or in an upland area at least 500 feet from a wetland boundary on land managed by the Bureau of Land Management (BLM). These activities can occur closer only if the Environmental Inspector finds, in advance, no reasonable alternative and the project sponsor and its contractors have taken appropriate steps (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill.
- Specifically, in certain instances, refueling or fuel storage may be unavoidable due to site-specific conditions or unique construction requirements (e.g., continuously operating pumps, or refueling within wetlands). The following precautions will be taken when refueling within 100 feet of wetlands or waterbodies, 200 feet of water supply well or spring and within 500 feet of streams, wetlands, or other waterbodies on land managed by the BLM, Bureau of Reclamation, and the U.S. Forest Service:
  - Adequate amounts of absorbent materials and containment booms must be kept on hand by each construction crew to enable the rapid cleanup of any spill which may occur.
  - If fuel must be stored within wetlands or near streams for refueling of continuously operating pumps, secondary containment must be provided.
  - Secondary containment structures must be lined with suitable plastic sheeting,

- provide a containment volume of at least 150 percent of the storage vessel, and allow for at least one foot of freeboard.
- Provide for adequate lighting of these locations and activities;
- Hazardous materials, including chemicals, fuels, and lubricating oils, are not stored within 100 feet of a wetland (150 in Oregon), waterbody, or designated municipal watershed area or within 200 feet of a water supply well or spring, unless the location is designated for such use by an appropriate governmental authority. This applies to storage of these materials and does not apply to normal operation or use of equipment in these areas; and
- Concrete coating activities are not performed within 100 feet of a wetland or waterbody boundary, or within 200 feet of a water supply well or spring, unless the location is an existing industrial site designated for such use.
- Adequate amounts of absorbent materials and containment booms will be kept on hand by each construction crew to enable the rapid cleanup of any spill that may occur.
- If fuel must be stored within wetlands or near streams for refueling of continuously operating pumps, secondary containment will be provided.
- Secondary containment structures will be lined with suitable plastic sheeting, provide a containment volume of at least 150 percent of the storage vessel, and allow for at least one foot of freeboard.
- Adequate lighting will be provided for these locations and activities.

The Contractor will install drip pans or other suitable containment devices to collect all vehicle fluids when performing on-site maintenance. All waste fluids will be removed from the site by the Contractor and disposed of properly.

The Contractor will inspect equipment for integrity, including, but not limited to, valves, hoses, and fittings. The Contractor will monitor all loading and unloading operations of chemicals and fuels to ensure proper response to prevent spills. The Contractors' personnel will inspect equipment at each use and will monitor fuel and chemical loading and unloading operations continuously.

Ruby will have one Lead Environmental Inspector and at least one Environmental Inspector assigned to each spread. Environmental Inspectors will visit each work area approximately twice per day, although some areas may receive more frequent or continual monitoring if warranted. Environmental Inspectors will document their inspection findings in daily reports. All hose connections will be inspected for leaks and if leakage occurs, the operation should cease until the leak is repaired or a containment pan is placed under the leaking connection and the leak has been properly contained and appropriately responded to, as described in Section 7.0 of this document.

## 7.0 Spill Response – Contractor Responsibilities

The Contractor will provide immediate notice to Ruby's Authorized Representative in the event of a spill or other emergency. All spills occurring on land or in watercourses (including intermittent and ephemeral streams), regardless of quantity, will be cleaned up immediately.

If a release or spill occurs, the Contractor will stop operations and take immediate measures to control the release and prevent dispersal of the spilled material. For spills to land (e.g., spills in drum storage areas, spills at bulk storage tank areas, spills at truck staging areas, equipment failure or leaks, etc.), the Contractor will initiate cleanup of the area affected by the spill by removing the soil and placing it into new or reconditioned DOT Spec. 1A2/Z150/S drums, or other suitable containers, as determined appropriate by Ruby. The Contractor will be deemed the generator of the waste resulting from the spill. The Contractor will excavate and remediate the area of the spilled material. For spills that enter water, the Contractor will contain the spill and remove the spilled material to the extent practicable using pumps or absorbent materials.

With the exception of spills/releases that involve Ruby-processed products/materials (e.g. pipeline liquids, used oil, etc.), the Contractor will be responsible for making any necessary notifications to the appropriate federal agencies for any release or spill of hazardous substances in excess of reportable quantities established by 40 Code of Federal Regulations (CFR) 117, 40 CFR 302, and 40 CFR 355 or releases of oil as defined by 40 CFR 110, which occurs as a result of the Contractor's or its subcontractors' activities.

The Contractor will be responsible for making any necessary notifications to the appropriate state agencies as per the states' requirements, established by Wyoming (WWQRR Chapter 4, <http://deq.state.wy.us/out/spills.htm>); Utah (Utah Code Title 19, <http://www.superfund.utah.gov/spills.htm>); Nevada (NAC 445A.345 to 445A.348, [http://ndep.nv.gov/bca/spil\\_rpt.htm](http://ndep.nv.gov/bca/spil_rpt.htm)); and Oregon (OAR 340, Division 142 <http://www.deq.state.or.us/regulations/rules.htm>) to report any release or spill that occurs in excess of the state's rules for reportable quantities of hazardous substances. In addition to the emergency release notifications to the appropriate federal and state agencies, notification will be made to the land management agency or landowner whose property may be impacted by the spill.

The Contractor will document and record all spills. Copies of the documentation will be provided to Ruby's Authorized Representative.



# **A. El Paso Pipelines Waste Management Plan Template**



## El Paso - Pipelines West Waste Management Plan Template

<b>Project Name</b>		<b>Project ID:</b>	<b>Date:</b>
<b>Brief Description of Project:</b>			
<b>Facility/Station:</b>	<b>Division/Area:</b>	<b>Line # (O&amp;M):</b>	
<b>EPA ID #:</b> _____			
<b>Contractor Name:</b> _____			
<b>Subcontractor Name:</b> _____			
<b>Contractor Representative:</b> _____		<b>Cell Phone No.:</b> _____	
<b>On-Site El Paso Representative:</b> _____		<b>Phone No.:</b> _____	
<b>El Paso Project Coordinator:</b> _____		<b>Phone No.:</b> _____	
<b>El Paso Waste Coordinator:</b> _____		<b>Phone No.:</b> _____	
<b>Approved By:</b> _____		<b>Date:</b> _____	
<i>El Paso Environmental Representative</i>			

<p><b>Objective</b></p> <p>Contractor/Central Maintenance/Roving Crew shall list all waste streams expected to be generated and proposed plans for handling, storage, and disposal of each waste stream. The plan shall include wastes generated during work performed by subcontractors, and must be reviewed and approved (signed) by the El Paso Environmental Representative prior to the commencement of any work.</p> <p><b>Instructions</b></p> <ol style="list-style-type: none"> <li>1. Review project scope. Check all appropriate waste streams (including wastes generated by subcontractor) listed in Attachment A.</li> <li>2. For each waste stream checked in Attachment A, complete the associated Details information on Attachment B. Delete Attachment B information for waste streams not associated with project.</li> <li>3. Provide original copies of manifests, bill of lading, and related waste documents to <b>On-Site El Paso Representative</b> listed above. <b>On-Site El Paso Representative</b> will make copies of the waste records and submit originals to Area Environmental Compliance Representative.</li> <li>4. Contact the El Paso Waste Coordinator if unanticipated waste is generated and modify Waste Management Plan to include new waste.</li> </ol> <p><b>Contractor/Central Maintenance/Roving Crew Responsibilities</b></p> <ol style="list-style-type: none"> <li>1. Implement the completed Waste Management Plan and appropriate Company guidelines/procedures when handling, storing, labeling, transporting, and disposing of waste. Refer to the current edition of the El Paso Pipeline Group's Environmental Handbook for more information. Contact the <b>El Paso Project Coordinator</b> with any project specific questions.</li> <li>2. Maintain onsite Material Safety Data Sheets for <b>hazardous chemicals</b> used on the jobsite.</li> <li>3. Inspect equipment to minimize releases to the environment.</li> <li>4. Notify Area Lead or Area Manager if Potentially Hazardous Waste and Hazardous Waste is generated. Keep waste storage segregated (hazardous, non-hazardous, domestic, universal, etc.) – do not mix different wastes.</li> <li>5. Inspect waste storage area to ensure that containers are properly closed, labeled, and stored.</li> <li>6. Keep emergency and spill equipment (as needed) at the jobsite.</li> <li>7. Communicate the status of all actual or potential non-compliance activities to the <b>On-Site El Paso Representative</b>.</li> <li>8. Report all spills and agency inspections to the <b>On-Site El Paso Representative</b>.</li> <li>9. Minimize waste generated during the project by purchasing and using only the amount of material needed.</li> </ol>
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**ATTACHMENT A**

**WASTE STREAMS**

**Asbestos Containing Materials**

- Ceiling tile repair/removal
- Floor tile repair/removal
- Gaskets
- Insulation
- Pipe coating
- Roofing tiles and siding.
- Transite
- Other: \_\_\_\_\_

**Abrasive Blasting Waste**

- Blasting bare pipe
- Feathering in fusion bonded epoxy
- After removal of pipe coating
- Blasting painted pipe **(PHW)\***

**Contaminated Soil**

- Hydrocarbon contaminated soil/gravel  
(specify source): \_\_\_\_\_
- Mercury contaminated soil
- Soil from cleanup of spill  
(specify contaminant): \_\_\_\_\_
- Soil from cleanup of Glycol/Ambitrol spill
- Soil impacted with other historical containments  
(specify contaminant): \_\_\_\_\_

**Empty Containers**

- Aerosol cans
- Empty drums/baskets
- Other: \_\_\_\_\_

**Equipment, Tank or Facility Cleanout Waste (PHW)\***

- Sludge/bottoms from cleanout of basement or sump
- Sludge/bottoms from cleanout of separator
- Sludge/bottoms from cleanout of scrubber
- Sludge/bottoms from tank cleanout: Source: \_\_\_\_\_
- Meter run cleanout: Chemicals/solvents: \_\_\_\_\_
- Other equipment cleanout (Frac Tank, etc) : \_\_\_\_\_

**Filters**

- Air filters/oil filters
- Scrubber filters **(PHW)\***
- Other filters (describe): \_\_\_\_\_

**General Trash**

- Plastics, Paper, wood, uncontaminated cardboard/rubber/cloth, wood packing materials, food wastes, aluminum cans/foil, glass, incandescent light bulbs, other waste similar to domestic waste

**Oily Debris**

- Oil stained cardboard
- Oily rags
- Oil absorbent used to clean up spill: \_\_\_\_\_
- Other oily debris: \_\_\_\_\_

**Oily Liquids**

- Used oil
- Hydraulic oil
- Scrubber liquids
- Distillate/condensate/pipeline drip
- Other oily liquids: \_\_\_\_\_

**Painting Waste**

- Old paint/coatings **(PHW)\***
- Paint brushes
- Solvents used to clean all paint equipment **(PHW)\***
- Other: \_\_\_\_\_

**PCB Waste**

- Air Systems
- Pipe coating (asphaltic-based)
- PCB impacted soils
- PCB oil/liquids
- Other: \_\_\_\_\_

**Pigging Waste**

- Pigging sludge **(PHW/PE&P)\***
- Pigging liquids **(PHW\* if not recyclable)**
- Used pigs
- Wash water from cleaning pigs or catch basins
- Other: \_\_\_\_\_

**\*HW = Hazardous Waste**

**\*PHW = Potentially Hazardous Waste**

**\*PE&P = Potentially Exploration & Production Waste**

**WASTE STREAMS**

**Scrap Metal, Piping, Equipment**

- Scrap metal with no coating
- Scrap metal with coating
- Scrap metal with potential NORM
- Equipment/vessels
- Other: \_\_\_\_\_

**Spent Solvents**

- Used cleaning solvents (PHW)\*: \_\_\_\_\_
- Other spent solvents (PHW)\*: \_\_\_\_\_

**Wastewater**

- Glycol liquids
- Hydrostatic test water
- Oil/water liquids in pipeline when pipe is cut in trench
- Produced water
- Scrubber liquids
- Turbine/Engine wash water
- Heater water
- Other wash water: \_\_\_\_\_

**Other Debris**

- Asphalt
- Cleared Vegetation
- Casing filler
- Cement
- Coke breeze
- Concrete without contaminants
- Contaminated concrete (e.g. oil, PCBs)  
List possible contaminants: \_\_\_\_\_
- Drilling mud
- Lumber
- Non-asbestos insulation
- Pipe coating (non-asbestos, non-PCB)
- Other: \_\_\_\_\_

**Other Waste** (List other waste not identified previously)

- Batteries (describe): \_\_\_\_\_
- CPS rectifier
- Fluorescent light bulbs
- Lead acetate/rubicon tape (PHW)\*
- Mercury containing equipment (switches etc.)
- Electronic equipment (circuit boards, transformers, etc.)  
Describe: \_\_\_\_\_
- Creosote-coated wood products (PHW\*)
- Personal Protective Equipment/rags (PHW\*)  
Describe source: \_\_\_\_\_
- Pesticides: \_\_\_\_\_
- Insecticides: \_\_\_\_\_
- Fertilizers: \_\_\_\_\_
- Other waste: \_\_\_\_\_

**\*HW = Hazardous Waste**

**\*PHW = Potentially Hazardous Waste**

**\*PE&P = Potentially Exploration & Production Waste**

**ATTACHMENT B  
WASTE MANAGEMENT PLAN DETAILS**

**Contractor shall be responsible for proper packaging, labeling, marking, storing and disposal of waste derived from Contractor including Contractor's vehicles and/or equipment. Proper handling and disposal of waste generated from spills of fluids from Contractor's vehicles and/or equipment shall be the responsibility of the Contractor.**

Waste Stream Name: <u><b>Asbestos Containing Materials - Pipe Coating</b></u>	Estimated Volume/Weight/ # of Containers: _____	<p align="center"><b>Handling, Storage, Disposal</b></p>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<p><b>Sampling Required?</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><i>Assume coal tar or asphaltic based coating is asbestos containing or Contact Environmental Dept for a site specific sampling plan.</i></p> <p><i>If coal-tar or asphaltic based, must test for PCBs.</i></p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>ACM - Non-Friable Pipe Coating label or Non-Hazardous Waste label with words "non-RACM" added. Certified abatement contractor will label friable materials.</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Notify Environmental for any projects involving friable asbestos, any demolition, or removal of &gt;260 linear ft. or &gt;160 square ft. of friable material. Friable asbestos has special training, handling, labeling, transport and disposal requirements. Use manual methods for removal. Follow Coal Tar and Asphaltic Pipe Coating Management Plan requirements. If asphaltic-based follow Guidance Managing Pipe Coating That May Contain PCBs</li> </ul>

Waste Stream Name: <u><b>Pipe Coating - PCB Wastes 50 ppm or Greater</b></u>	Estimated Volume/Weight/ # of Containers: <u><b>Unknown</b></u>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<p><b>Sampling Required?</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Mark storage area with EPA approved M<sub>L</sub> Mark (yellow label).</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Contact Environmental Department to coordinate disposal. Follow Guidance Managing Pipe Coating That May Contain PCBs for pipe coating waste. Dispose within 30 days of waste generation. The date of sampling is not considered the generation date.</li> </ul>

Waste Stream Name: <b><u>Asbestos Containing Materials (specify type)</u></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non-Hazardous Waste label with words "non-RACM" added. Certified abatement contractor will label friable materials.</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Notify Environmental for any projects involving friable asbestos, any demolition, or removal of &gt;260 linear ft. or &gt;160 square ft. of friable material. Friable asbestos has special training, handling, labeling, transport and disposal requirements. Caution must be taken to utilize appropriate work practices so that non-friable materials do not become friable when generating waste.</li> </ul>

Waste Stream Name: <b><u>Abrasive Blasting Waste - Bare Pipe (New Pipe) or Feathering in FBE or Temporary Factory Primer</u></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non-Hazardous Waste - Spent Abrasive Blast Media label</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: On-site disposal must be approved by Environmental                      _____</li> </ul>

<p>Waste Stream Name: <b><u>Abrasive Blasting Waste - After Removal of Pipe Coating</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p><i>As per legal guidance, if the pipe coating prior to abrasive blasting has PCB's 50 ppm or greater, then the abrasive blasting waste is also considered PCB waste.</i></p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non-Hazardous Waste - Spent Abrasive Blast Media label; If PCBs are 50 ppm or above, then apply PCB Label.</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues:</li> </ul>

<p>Waste Stream Name: <b><u>Abrasive Blasting</u></b> <b><u>Waste - Painted</u></b> <b><u>Metal</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input checked="" type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Sampling required even for non lead based paint on pipe since other heavy metals may be present.</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Potentially Hazardous Waste Awaiting Characterization Label</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name: <i>Not Applicable. DO NOT Transport.</i></li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No</li> <li>• Responsible for conducting weekly inspections? <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Who will conduct weekly inspections? _____</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> </ul> <p>Any Special Issues: <b>See ADDENDUM 1 for SPECIAL REQUIREMENTS</b></p> <p><b>Storage:</b></p> <ul style="list-style-type: none"> <li>• Mark each drum with a Potentially Hazardous Waste label and the generation date (accumulation start date)</li> <li>• For Potentially Hazardous Waste, contact Environmental Compliance Department for the Area to arrange for sampling and analysis.</li> <li>• All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.</li> <li>• Provide spill containment.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks.</li> <li>• Place drums so that labels can be easily seen when walking around containment.</li> <li>• Begin <b>WEEKLY Container</b> inspections.</li> <li>• Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.</li> <li>• Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit in immediate area of the waste storage site. In Arizona, keep within 50 feet.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks ( example : when using plastic portable containment, place only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums)</li> </ul>

<p>Waste Stream Name: <b><u>Contaminated Soil - Hydrocarbon Contaminated from Liquids in Pipeline or Spills from El Paso Equipment</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>In Arizona, sample for PAH</i></p> <p><i>Sampling may be required if a current profile is not available. Check with Environmental Compliance Rep. for your Area.</i></p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Hydrocarbon Impacted Soil label</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: In Arizona, if PAH exceeds regulatory levels AZ special waste number is required prior to transport. Waste derived from leaks/spills from Contractor's equipment is the responsibility of the contractor.</li> </ul>

<p>Waste Stream Name:  <u><b>Contaminated Soil - Spill Cleanup (specify contaminant such as mercury contaminated, etc )</b></u></p>	<p>Estimated Volume/Weight/ # of Containers:          _____</p>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW  <input checked="" type="checkbox"/> PHW  <input type="checkbox"/> PE&amp;P  <input type="checkbox"/> Non-HW  <input type="checkbox"/> Special  <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Potentially Hazardous Waste label with words "From cleanup of (insert contaminant) spill" added</b></li> <li>• Responsible to transport waste from site to secure storage site:  <i>(obtain permission from El Paso facility before storage at a company location)</i>  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? _____</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Check impact on generator status, may trigger LQG requirements. Follow Hazardous Waste storage requirements. Handle cleanup of oil/fuel spills as Contaminated Soil - Hydrocarbon Contaminated.</li> </ul> <p>Any Special Issues: <b>See ADDENDUM 1 for SPECIAL REQUIREMENTS</b></p> <p><b>Storage:</b></p> <ul style="list-style-type: none"> <li>• Mark each drum with a Potentially Hazardous Waste label and the generation date (accumulation start date)</li> <li>• For Potentially Hazardous Waste, contact Environmental Compliance Department for the Area to arrange for sampling and analysis.</li> <li>• All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.</li> <li>• Provide spill containment.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks.</li> <li>• Place drums so that labels can be easily seen when walking around containment.</li> <li>• Begin <b>WEEKLY Container</b> inspections .</li> <li>• Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.</li> <li>• Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit in immediate area of the waste storage site. In Arizona, keep within 50 feet.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks ( example : when using plastic portable containment, place only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums)</li> </ul>

<p>Waste Stream Name: <b><u>Oily Debris - Rags,</u></b> <b><u>Sock Type</u></b> <b><u>Absorbents, Stained</u></b> <b><u>Cardboard</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Waste storage container type: Plastic bags or rolloff container</li> <li>• Labeling requirements: <b>Non-Hazardous Waste label</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known): Contractor will coordinate disposal with proper solid waste facility.</li> <li>• Any Special Issues: No liquid waste allowed. <i>Personal Protective Equipment ( PPE ) from non-hazardous waste may also be disposed with this waste.</i></li> </ul>

<p>Waste Stream Name: <b><u>General Trash</u></b> <b><u>to include empty and</u></b> <b><u>dry paint cans, PPE,</u></b> <b><u>etc and Painting</u></b> <b><u>Waste such as dry</u></b> <b><u>paint brushes and</u></b> <b><u>painting cloth</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Waste storage container type: Plastic bags or rolloff container</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known): Contractor will coordinate disposal with proper solid waste facility.</li> <li>• Any Special Issues: No liquid waste allowed. Segregate from other (industrial) waste. Empty aerosol cans to atmospheric pressure ( spray, do not puncture ).</li> </ul>

Waste Stream Name: <u><b>Painting - Reusable Paint ( Excess from Project )</b></u>	Estimated Volume/Weight/ # of Containers:	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Not Applicable – Paint Can Should Have Label</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate recycling : <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final recycling site (if known): Contractor will reuse leftover paint on another project or haul paint to approved El Paso site for future use.</li> <li>• Any Special Issues:</li> </ul>

Waste Stream Name: <u><b>Empty Containers</b></u>	Estimated Volume/Weight/ # of Containers:	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Empty label on drums</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Empty aerosol cans to atmospheric pressure (spray, do not puncture). Triple-rinse pesticide containers. Keep empty drums closed and segregated from other drums. Recycle if possible.</li> </ul>

<p>Waste Stream Name: <b><u>Equipment, Tank, Facility Cleanout Waste</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input checked="" type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Potentially Hazardous Waste label</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? _____</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Check impact on generator status, may trigger LQG requirements. Follow Hazardous Waste storage requirements.</li> </ul> <p>Any Special Issues: <b>See ADDENDUM 1 for SPECIAL REQUIREMENTS</b></p> <p><b>Storage:</b></p> <ul style="list-style-type: none"> <li>• Mark each drum with a Potentially Hazardous Waste label and the generation date (accumulation start date)</li> <li>• For Potentially Hazardous Waste, contact Environmental Compliance Department for the Area to arrange for sampling and analysis.</li> <li>• All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.</li> <li>• Provide spill containment.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks.</li> <li>• Place drums so that labels can be easily seen when walking around containment.</li> <li>• Begin <b>WEEKLY Container</b> inspections .</li> <li>• Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.</li> <li>• Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit in immediate area of the waste storage site. In Arizona, keep within 50 feet.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks ( example : when using plastic portable containment, place only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums)</li> </ul>

Waste Stream Name: <u><b>Filters - Air Filters/ Oil filters</b></u>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non-Hazardous Waste label with words "Used Oil" added for drained oil filters</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Drain used oil filters at least 24 hours. Do not store more than 3 drums of used oil filters. Do not dispose of used oil filters in general trash without Environmental approval.</li> </ul>

Waste Stream Name: <u><b>Filters - Scrubber Filters</b></u>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No  Contact Environmental Compliance Department for your Area to check if sampling is required.	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Contact Environmental Department for guidance.</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Based on previous experience, if filters may ignite upon removal from vessel, keep wet. There are unique requirements based on generation location and previous analytical results.</li> </ul>

Waste Stream Name: <b><u>General Trash</u></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: No liquid waste allowed. Segregate from other (industrial) waste.                      _____</li> </ul>

Waste Stream Name: <b><u>Oily Debris - Rags, Absorbents, Trash</u></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non-Hazardous Waste label</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: No liquid waste allowed. <i>Personal Protective Equipment (PPE) from non-hazardous waste may also be disposed with this waste.</i></li> </ul>

Waste Stream Name: <b><i>Oily Liquids</i></b>	Estimated Volume/Weight/ # of Containers:  _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<p style="text-align: center;"><b>Sampling Required?</b></p> <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No  Contact Environmental Compliance Rep. for your Area to determine if testing for PCBs and halogens is required.  If liquids are pumpable, recycle.	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Used Oil label</b></li> <li>• Responsible to transport waste from site to secure storage site:  <i>(obtain permission from El Paso facility before storage at a company location)</i>  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b> </li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Do not add to used oil tank unless special approval obtained from Environmental. Send to approved recycler.  _____</li> </ul>

<p>Waste Stream Name:  <u><b>Non Recycled Solvent used to clean paint brushes or nozzels ( Spent Solvents ) or Non Recycled Paint in need of disposal</b></u></p>	<p>Estimated Volume/Weight/ # of Containers:          _____</p>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW  <input checked="" type="checkbox"/> PHW  <input type="checkbox"/> PE&amp;P  <input type="checkbox"/> Non-HW  <input type="checkbox"/> Special  <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b>  <input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><i>Sampling not required if handled as Hazardous Waste</i></p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Potentially Hazardous Waste label</b></li> <li>• Responsible to transport waste from site to secure storage site:  <i>(obtain permission from El Paso facility before storage at a company location)</i>  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? _____</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> </ul> <p>Any Special Issues: <b>See ADDENDUM 1 for SPECIAL REQUIREMENTS</b></p> <p><b>Storage:</b></p> <ul style="list-style-type: none"> <li>• Mark each drum with a Potentially Hazardous Waste label and the generation date (accumulation start date)</li> <li>• For Potentially Hazardous Waste, contact Environmental Compliance Department for the Area to arrange for sampling and analysis.</li> <li>• All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.</li> <li>• Provide spill containment .</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks.</li> <li>• Place drums so that labels can be easily seen when walking around containment.</li> <li>• Begin <b>WEEKLY Container</b> inspections .</li> <li>• Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.</li> <li>• Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit in immediate area of the waste storage site. In Arizona, keep within 50 feet.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks ( example : when using plastic portable containment, place only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums)</li> </ul>

Waste Stream Name: <u><b>Scrap Metal, Pipe, Equipment</b></u>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <b>Asphaltic-based coated pipe must be analyzed for PCBs.</b>  <i>Assume coal tar or asphaltic based coating is asbestos containing or contact Environmental Dept for a site specific sampling plan.</i>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Recycle if possible. Notify purchaser any coating may contain asbestos, Bill of Sale/Purchase Agreement required. Remove sludge, handle as separate waste. For coated pipe, follow Coal Tar and Asphaltic Pipe Coating Management Plan and Guidance Managing Pipe Coating That May Contain PCBs. Contact Supply Chain Management Representative ( Oscar Robles ) to coordinate recycling since only approved contractors can accept coal tar asphaltic pipe.</li> </ul>

Waste Stream Name: <u><b>Scrap Metal, Pipe, Equipment - with no coating</b></u>	Estimated Volume/Weight/ # of Containers: <u><b>5000 pounds</b></u>	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Waste storage container type: Bulk Storage</li> <li>• Labeling requirements: <b>None.</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location: On site near project area, ready to load onto trucks.</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate recycling: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name: Contractor</li> <li>• Final recycling site (if known): Contractor.</li> <li>• Any Special Issues: Contractor will coordinate recycling. Contact SCM regarding Bill of Sale/Purchase Agreement.</li> </ul>

Waste Stream Name: <u><b>Hydrostatic Test Water - specify New Pipe or Used Pipe</b></u>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<p><b>Sampling Required?</b></p> <input type="checkbox"/> Yes <input type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Follow discharge permit requirements.                      _____</li> </ul>
<p><i><b>Follow sampling requirements of discharge permit</b></i></p> <p><i><b>Contact Env. Compliance Department about State-Specific permitting and discharge requirements.</b></i></p>		

<p>Waste Stream Name:  <u><b>Hydrostatic Test                  Water from Testing                  Used Pipe - Hauled to                  Station Lined Pond</b></u></p>	<p>Estimated                  Volume/Weight/                  # of Containers:                  _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW  <input type="checkbox"/> PHW  <input type="checkbox"/> PE&amp;P  <input checked="" type="checkbox"/> Non-HW  <input type="checkbox"/> Special  <input type="checkbox"/> Unknown</p>	<p><b>Sampling                  Required?</b>  <input type="checkbox"/> Yes  <input type="checkbox"/> No</p> <p><i>Follow sampling                  requirements of                  discharge permit</i></p> <p><i>Contact Env.                  Compliance                  Department                  about State-                  Specific                  permitting and                  discharge                  requirements.</i></p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                  (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Follow discharge permit requirements. Prevent oil into pond. If unexpected oil is discharged into pond, then use oil booms/absorbents to remove oil. Notify Area Supervision of plans to haul water to Pond.</li> </ul> <ol style="list-style-type: none"> <li>1. Project Coordinator should inspect the frac tank prior to discharge from pipeline into tank. The tank should be clean.</li> <li>2. Project Coordinator will coordinate with the trucking company and ask that the tanker truck(s) be clean.</li> <li>3. Project Coordinator should inspect the tanker truck prior to pumping from frac tank. Verify with driver that tank is clean.</li> <li>4. Project Coordinator will call Area Lead and describe the water – i.e. black but not oily, rust color, etc...</li> <li>5. Station Technician shall conduct visual observations of the discharge water for at least the first 30 minutes of discharge. If there is unusual odor, foaming, or other indications of suspect liquids, Station technician shall immediately stop the discharge and contact Area Supervision.</li> </ol>

Waste Stream Name: <b><u>Wastewater - specify source</u></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  <b><i>Follow sampling requirements of discharge permit</i></b>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Follow discharge permit requirements.                      _____</li> </ul>

Waste Stream Name: <b><i>Drilling Mud</i></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No  <b>Contact Env. Compliance Dept if there are additives since special disposal requirements may apply.</b>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Waste storage container type: On site – spread on approved work space.</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name: NA</li> <li>• Waste storage secure location: NA</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known): On approved work space with Landowner approval.</li> <li>• Any Special Issues: Bentonite only. No additives approved for disposal.</li> </ul>

Waste Stream Name: <b><i>Other Debris - specify type</i></b>	Estimated Volume/Weight/ # of Containers: _____	<b>Handling, Storage, Disposal</b>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site:                      (obtain permission from El Paso facility before storage at a company location)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known): Local Landfill</li> <li>• Any Special Issues: Disposal authorization required from landfill.</li> </ul>

Waste Stream Name: <u><b>Other Debris - Vegetation, concrete without contaminants, non asbestos and non PCB coating</b></u>	Estimated Volume/Weight/ # of Containers:  _____	<p style="text-align: center;"><b>Handling, Storage, Disposal</b></p> <ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type: Lined Rolloff Container</li> <li>• Labeling requirements: <b>None</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input checked="" type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known): Contractor will coordinate disposal at proper solid waste facility.</li> <li>• Any Special Issues: No liquid waste allowed. Segregate from other (industrial) waste. Obtain disposal authorization from landfill as required.</li> </ul>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<p style="text-align: center;"><b>Sampling Required?</b></p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Waste Stream Name: <u><b>Other Waste - specify type</b></u>	Estimated Volume/Weight/ # of Containers:  _____	<p style="text-align: center;"><b>Handling, Storage, Disposal</b></p> <ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Universal Waste or Potentially Hazardous Waste label</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: Contact Environmental for specific requirements  _____</li> </ul>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input checked="" type="checkbox"/> Special <input type="checkbox"/> Unknown	<p style="text-align: center;"><b>Sampling Required?</b></p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

<p>Waste Stream Name:  <u><b>Pigging Waste - Sludge and Non-Recyclable Liquids and Cleanout of Frac Tank with Sludge Accumulation and Mixture of N-Spec and Water</b></u></p>	<p>Estimated Volume/Weight/ # of Containers:  <hr/></p>	<p align="center"><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW  <input checked="" type="checkbox"/> PHW  <input type="checkbox"/> PE&amp;P  <input type="checkbox"/> Non-HW  <input type="checkbox"/> Special  <input type="checkbox"/> Unknown</p>	<p align="center"><b>Sampling Required?</b></p> <p><input checked="" type="checkbox"/> Yes  <input type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Pipelines Services  <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Potentially Hazardous Waste Awaiting Characterization Label</b></li> <li>• Responsible to transport waste from site to secure storage site:  <i>(obtain permission from El Paso facility before storage at a company location)</i>  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name: <i>Not Applicable. DO NOT Transport.</i></li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input checked="" type="checkbox"/> <b>Yes</b> <input type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> </ul> <p>Any Special Issues: <b>See ADDENDUM 1 for SPECIAL REQUIREMENTS</b></p> <p><b>Storage:</b></p> <ul style="list-style-type: none"> <li>• Mark each drum with a Potentially Hazardous Waste label and the generation date (accumulation start date)</li> <li>• For Potentially Hazardous Waste, contact Environmental Compliance Department for the Area to arrange for sampling and analysis.</li> <li>• All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.</li> <li>• Provide spill containment.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks.</li> <li>• Place drums so that labels can be easily seen when walking around containment.</li> <li>• Begin <b>WEEKLY Container</b> inspections .</li> <li>• Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.</li> <li>• Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit in immediate area of the waste storage site. In Arizona, keep within 50 feet.</li> <li>• Allow adequate aisle space to allow a person to walk around and in between drums to check for leaks ( example : when using plastic portable containment, place only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums)</li> </ul>

<p>Waste Stream Name: <b><i>Pigging Waste - Used Pigs</i></b></p>	<p>Estimated Volume/Weight/ # of Containers: <b><i>NA</i></b></p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>In Arizona, pigs will need to be sampled prior to disposal.</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>None.</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name: <i>Not Applicable</i></li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____ <input type="checkbox"/> Not Applicable</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Transporter company name:</li> <li>• Final recycling site (if known): <i>Mesa Oil, Safety-Kleen or Thermofluids</i></li> <li>• Any Special Issues: <i>Discarded pigs must be clean, be free of oil, and have no liquids or sludge accumulation. If pigs have sludge accumulation, then sample and manage as pigging sludges.</i></li> </ul>

<p>Waste Stream Name: <b><u>Pigging Waste - Wash Water from Catch Basins or Pig Cleaning</u></b></p>	<p>Estimated Volume/Weight/ # of Containers: _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&amp;P <input checked="" type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown</p>	<p><b>Sampling Required?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Waste storage container type:</li> <li>• Labeling requirements: <b>Non Hazardous Waste Label ( if rented tank, affix label with clear tape or use a magnetic label so it can be removed later)</b></li> <li>• Responsible to transport waste from site to secure storage site: <i>(obtain permission from El Paso facility before storage at a company location)</i> <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name: <i>NA</i></li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____ <input type="checkbox"/> Not Applicable</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel <input type="checkbox"/> Contractor _____</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues: <i>Contain in drums/tanks, dispose at approved facility. If mainly oil, handle as recyclable pigging liquids. If mainly water, handle as oily water.</i></li> </ul>

<p>Waste Stream Name:  <u><b>Pigging Waste -                  Recyclable Liquid -                  (Using Diesel and N-                  Spec )</b></u></p>	<p>Estimated                  Volume/Weight/                  # of Containers:                  _____</p>	<p><b>Handling, Storage, Disposal</b></p>
<p><input type="checkbox"/> Known HW  <input type="checkbox"/> PHW  <input type="checkbox"/> PE&amp;P  <input type="checkbox"/> Non-HW  <input checked="" type="checkbox"/> Special  <input type="checkbox"/> Unknown</p>	<p><b>Sampling                  Required?</b>  <input checked="" type="checkbox"/> Yes ( Used oil                  must be tested                  for PCBs and                  Total Organic                  Halogens                  (chlorine or                  bromine                  compounds)                  prior to                  recycling   <input type="checkbox"/> No</p>	<ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Pipelines Services  <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Waste storage container type: <i>Drums. Or Frac-tanks</i></li> <li>• Labeling requirements: <b>Used Oil label ( if rented tank, affix label with                  clear tape so label can be removed later or use magnetic label)</b></li> <li>• Responsible to transport waste from site to secure storage site:  <i>(obtain permission from El Paso facility before storage at a company location)</i>  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input checked="" type="checkbox"/> N/A <input type="checkbox"/> <b>Do Not Transport offsite for storage</b></li> <li>• Transporter company name: <i>Not Applicable</i></li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</li> <li>• Who will conduct weekly inspections? NA</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Pipelines Services <input type="checkbox"/> Area Personnel  <input type="checkbox"/> Contractor _____</li> <li>• Transporter company name: <i>If analytical results are OK, then can transport one                  drum at a time to Station Oil Containment or oil recycler.</i></li> <li>• Final recycling site (if known): <i>Mesa Oil, Safety-Kleen or Thermofluids</i></li> <li>• Any Special Issues: <i>If not recycled as used oil, handle as non-recyclable pigging                  waste. For small quantities of use oil, if analytical results are OK, then can transport                  one drum at a time to Station Oil Containment. <b>IMPORTANT:</b> To minimize the                  possible generation of sludge from long term storage of liquids in drums or frac-                  tanks, coordinate the pickup of liquid the same day it is containerized in the                  drum(s) or frac-track. Request from the oil recycler that it be prepared to sample                  for total organic halides and PCBs using a field test kit. If using chemicals other                  than N-SPEC, contact Environmental Compliance Dept for approval.</i></li> </ul>

**PIPELINES WEST ADDENDUM 1**  
**SPECIAL REQUIREMENTS FOR HAZARDOUS OR POTENTIALLY HAZARDOUS WASTE**

*Use RCRA Checklist to determine applicable requirements for CESQG, SQG, and LQG facilities*

**Storage:**

- Provide Fire Extinguisher, First Aid Kit with bottle eyewash, and Spill Kit within 50 feet of the waste storage site.
- Mark each drum with a Hazardous Waste or Potentially Hazardous Waste label and the generation date (accumulation start date)
- For Potentially Hazardous Waste, contact Area Environmental Compliance Department Representative to arrange for sampling and analysis.
- All wastes must be stored in DOT-approved containers (e.g. drums, rolloff boxes). Do not store wastes containing liquids in rolloff boxes.
- Provide secondary containment for drums.
- Allow adequate aisle space to allow a person to walk all around drums to check for leaks.
- If using plastic portable containment, recommend placing only ( 2 ) drums rather than ( 4 ) drums on each containment to allow for adequate aisle space between drums.
- Place drums so that labels can be easily seen when walking around containment.
- Begin **WEEKLY** container inspections of hazardous waste or potentially hazardous waste.
- Only trained ( ENV00509 or ENV00511) Company Personnel should sign Uniform Hazardous Waste Manifest.

**Contingency Plan:**

- If the amount of Hazardous or Potentially Hazardous Waste is between 220 pounds and 2200 pounds, a SQG Emergency Contact Posting must be posted by the telephone. Contact Area Environmental Compliance Department Representative for assistance in preparing the posting.
- If amount of Hazardous or Potentially Hazardous Waste is over 2200 pounds, an LQG Contingency Plan must be prepared and submitted to the local fire & police department, local hospital, and state environmental agency. Contact Area Environmental Compliance Department Representative for assistance in preparing the Contingency Plan.

**Special State Requirements**

**Arizona**

- For Oily Dirt, test for TPH and BETX and PAHs (Polynuclear Aromatic Hydrocarbons). Also test for California TTLC. If sample exceeds thresholds, an Arizona Special Waste number must be obtained from ADEQ.

**California:**

- For Potentially Hazardous Waste, test for California TTLC and STLC in addition to RCRA TCLP testing.
- Used Oil is considered Hazardous Waste. Used Oil drums must be labeled with a California Hazardous Waste label, and weekly drum inspections are required. An EPA or CAL ID number is required for transportation.
- To be considered empty, drums must contain no pourable material or crusted-on buildup of material. The drum must be marked with the date emptied and must be recycled or disposed of within one year.

**Waste-Specific Requirements:**

- Waste streams must be kept segregated
- Empty Containers must be dry (all free-flowing liquids removed) and must contain less than 3% residue (if Container's capacity is 110 gallons or less) or less than 0.3% residue (if Container's capacity is greater than 110 gallons). If container is an aerosol can, it must be emptied to atmospheric pressure.
- Oily rags must be dry (remove liquids by wringing out or allow to air-dry) prior to disposal.
- Contractor is responsible for any oily dirt from equipment spills or leaks
- Used oil must be tested for PCBs and Total Organic Halogens (chlorine or bromine compounds) prior to recycling
- Asphaltic-based pipe coating must be managed as specified in the Coal Tar and Asphaltic Pipe Coating Management Plan.
- Asphaltic-based pipe coating must be tested for PCBs. If PCBs are detected, pipe and coating must be managed as specified in the Guidance for Managing Pipe Coating That May Contain PCBs.

**Pigging Project Best Practices**

- Recycle pumpable used oil/diesel liquids
- Wait to obtain laboratory sample for waste characterization until **all** waste is generated from process.
- Remember that sampling for internal corrosion policy and waste characterization are different.
- Clean Smart Pig and Brush Magnet Pig at pig receiver basin prior to sending back to vendor.
- If there is Potentially Hazardous Waste ( i.e. pigging sludge or pigs with lots of sludge on them ), coordinate with Area Operations on who will begin weekly drum inspections and meet other requirements. Immediately contact the Area Environmental Compliance Department Representative upon **GENERATION** of the waste stream. There are strict timelines from **GENERATION** date to **DISPOSAL** date.
- To minimize the possible generation of sludge from long term storage of liquids in drums or frac tank, coordinate the pickup of liquid the same day it is containerized in the drum(s) or frac-track. Request from the oil recycler that it be prepared to sample for total organic halides and PCBs using a field test kit.

## **B. Environmental Handbook**



# Environmental Handbook

## 2008 Edition



**Environmental Handbook**  
**El Paso Pipeline Group**

**2008 Edition**





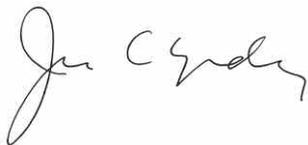
## ***From the President:***

El Paso Corporation's values of stewardship, integrity, safety, accountability, and excellence are the foundation by which we carry out the business of transporting natural gas in a safe, reliable and dependable manner. Our environmental commitment and performance plays an integral and important role in support of each of these values.

El Paso has an Environmental Management System (EMS) which is built around our corporate values as well as our EH&S Commitment and our policies and procedures. The EMS is a compilation of tools, processes, and procedures that form the foundation of our environmental compliance and stewardship program.

This Environmental Handbook is a component of the EMS. It communicates **minimum** work practices for employees to perform their jobs in compliance with applicable laws and regulations. It is designed to be used as a tool to incorporate environmental considerations into our operations and also serves to communicate expectations to contractors. It will assist us in conducting our business in a manner that protects human health and the environment.

As employees of El Paso, each of us is accountable for demonstrating a personal commitment to environmental stewardship and compliance. A successful environmental program is meaningful and will serve El Paso to be the place to work, the neighbor to have, and the company to own.

A handwritten signature in black ink, appearing to read "Jim Yardley". The signature is fluid and cursive, with a large initial "J" and "Y".

Jim Yardley

President, Pipeline Group

## **Introduction**

This handbook serves as a reference guide for minimum rules and standards at El Paso Corporation East and West Pipeline facilities. It is an integral part of the El Paso Pipeline Group's Environmental Management System. You may also need to consult other corporate resources for more detailed reference materials or procedures.

Some of these procedures have safety and health considerations. Please consult the Safety and Health Department for any safety and health-related issues.

### **Changes to the Handbook**

This handbook contains information that is current at the time of production. However, to address changes in statutes and regulations, this handbook will be reviewed and updated as necessary.

If you have any questions or suggestions, contact the handbook editorial committee via email to:

[Environmental.Handbook@elpaso.com](mailto:Environmental.Handbook@elpaso.com)

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## Introduction

### Responsibilities

#### MANAGEMENT WILL:

- Be accountable for and support environmental compliance.
- Communicate to all employees and contract employees the environmental compliance policies and procedures of the Company.
- Provide employees with the appropriate tools and training to successfully complete each job in an environmentally sound manner.
- Require that all employees and contractors be qualified to perform assigned jobs.
- Review environmental requirements during tailgate meetings.
- Provide oversight and monitoring of environmental practices of contractors.
- Recognize and comply with all environmental compliance rules and policies that are applicable to the location.

#### EMPLOYEES WILL:

- Be responsible for their actions regarding environmental compliance.
- Immediately report all environmental incidents to supervision and the Environmental Department.
- Participate in environmental training.
- Recognize and comply with all environmental compliance rules and policies that are applicable to the location or job.
- Initiate and comply with project-specific Waste Management Plans.

#### CONTRACTORS WILL:

- Be responsible for the actions of their employees by training their employees to follow the rules that are applicable to the job and location.
- Immediately report all environmental incidents to a Company representative.
- Have established environmental compliance programs in place before starting work for the Company.
- Discuss environmental issues with Company personnel prior to commencing work.
- Provide proof of training or other environmental certification documentation upon request.

- Follow Company Waste and Spill Management Specifications.
- Participate in the development of a Waste Management Plan with the Company prior to commencing work.
- Hold their employees accountable for complying with the project-specific Waste Management Plan.

### **ENVIRONMENTAL DEPARTMENT WILL:**

- Provide environmental support and guidance to assist El Paso Pipeline Group in achieving compliance.
- Acquire and maintain the necessary environmental tools and training to support the Company compliance program.
- Be the primary contact with regulatory agencies.
- Periodically assess the environmental compliance status of company facilities.

# ENVIRONMENTAL HANDBOOK

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## Activities That Could Require an Air Permit Review

### **Basic Concepts of Air Permitting**

The Federal Clean Air Act (CAA) frequently requires that an operator of a stationary source of air emissions obtain and comply with an air permit before the stationary source can be constructed or operated. Common "stationary sources" in the natural gas industry include temporary or permanent compressor engines, turbines, generators, tanks, dehydrators, pumps, fire tubes, reboilers or associated equipment, boilers, vaporizers, flares, etc. The Environmental Department is responsible for obtaining required air permits based upon information provided by Project Management and for preparing Compliance Action Plans (CAPs), which identify the specific requirements of the permits and are the primary compliance tool for sources with existing operating permits. **Be aware that it can take 18 months or more to obtain a new or modified air permit!**

### ***New, Reactivated, or Reconstructed Stationary Sources May Need a Construction Permit***

New, reactivated, or reconstructed stationary sources of air pollution may need a construction permit before construction can commence and the source can legally be operated. A source is "reconstructed" if the components of an existing stationary source are replaced and/or repaired and the fixed capital costs exceed a specified percentage (usually around 50%) of the cost of constructing a comparable new source, and the project results in an emissions increase. Contact the Environmental Department immediately upon learning of such projects. In addition, notify the Environmental Department if there are any proposed design changes after the initial design that could affect emissions. Finally, be aware that a permitted source that has not operated for an extended period of time may be treated as a "new" source and may need to obtain an entirely new air permit before it can be returned to service.

**! The Regulatory Affairs and Environmental Departments must be notified as soon as projects are identified that involve the abandonment of any stationary source or operating hours restriction.**

**! The Compressor Operations Policies and Procedures (COPP) Manual requires that all compressor and auxiliary units be operated for a minimum of one hour per year (not to exceed 15 months). If a unit is not operated at least one hour annually, re-permitting may be required prior to starting the unit.**

### ***The "Modification" of an Existing Source May Require That a New Permit Be Obtained or That an Existing Permit Be Changed***

Air permits for existing stationary sources may need to be revised if the source is "modified," which means any change in the amount of pollutants (up or down) emitted by a stationary source caused by:

- Any physical change to the source; or
- Any change in the method of operation of the source.

The Environmental Department must be consulted prior to the modification of any stationary source. The COPP Manual identifies specific work activities performed on engines and other stationary sources that may constitute modifications and thereby trigger the need to revise the source's air permit.

**“Routine Maintenance, Repair, and Replacement” Activities Are Not “Modifications”**

Physical changes to a source that are routine maintenance, repair, and replacement (RMRR) activities are not considered to be “modifications”. The following lists a few examples of RMRR activities that can be done without first consulting the Environmental Department; consult the RMRR Applicability Guidance document for more detailed descriptions of allowable activities:

- Engine balancing
- Inspection and cleaning
- Oil changes
- Changing of filters

**! Replacement parts that are similar, but not identical to the parts being replaced must be evaluated for their potential impact to the combustion process.**

**! Some states or individual jurisdictions (Indian Lands, county, etc.) do not allow turbine component exchanges without prior notice or a specific permit to do so. Contact the Environmental Department for information on your state or jurisdiction.**

***For Further Information***

Refer to the following procedures in this Handbook:

- Air Permits
- Compressor Operations Policies and Procedures Manual (outside this handbook)
- Facility Title V Compliance Action Plan (outside this handbook)
- RMRR Applicability Guidance Document (outside this handbook)

Notes:

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## Air Emissions Testing by Agencies

### **Background**

Under the Clean Air Act, regulatory agencies have the authority to conduct emissions testing at permitted facilities, with or without prior notice. Agencies conduct testing to verify that emissions from permitted emissions sources are below the air permit limits. The testing may consist of a full EPA reference method test or may be performed with a portable analyzer.

### **What to do When an Agency Representative Arrives**

When the agency representative arrives at the facility with emissions testing equipment:

1. Request identification from the agency representative (e.g., photo ID). Make a copy of the credentials for the file.
2. Notify the following immediately when an agency representative arrives to conduct emissions testing:
  - Facility Management
  - Environmental Department (who will contact the Air Permit Engineer and Legal)
  - Reliability Specialist, preferably the individual responsible for periodic emissions testing
  - Mechanical Testing Group
  - Gas Control

Every effort should be made to get a Reliability Specialist or Mechanical Testing Group representative on site as soon as possible to witness and document the procedures used by the agency testing personnel.

As generally required by air permits, the Company will reasonably accommodate agency testing. Unannounced emissions testing should NOT be allowed if:

- It disrupts the Company's operations; or
- It causes the Company undue expense such as overtime, significant labor, excess fuel, etc.; or
- It is not within the current demand of pressures, utilization and throughput.

The final determination of whether to allow the agency to conduct emissions testing will be made by Facility Management with the input of the above-referenced personnel.

### **For Further Information**

Refer to the following procedures in this Handbook:

- Facility Title V Compliance Action Plan (outside this handbook)
- Regulatory Inspection Guidelines



## Air Permits

### **Background**

The Clean Air Act has several programs to protect and enhance the quality of the Nation's air resources including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), New Source Review (NSR), and Prevention of Significant Deterioration (PSD). Depending on the level and source of emissions, various types of air permits may be required including:

- Title V Operating Permits
- General Operating Permits (GOP)
- Prevention of Significant Deterioration (PSD) Permits
- Non-attainment New Source Review (NNSR) Permits
- Construction Permits
- Minor Source Permits
- Synthetic Minor Source Permits

Certain work practices and some small sources, e.g., emergency generators, heater treaters, or sources that were in existence before a certain date (grandfathered), may be exempt from air permitting requirements.

### **Air Permit Compliance**

1. Immediately notify the Environmental Department if there is a planned construction or modification of any combustion source, storage tank, dehydration unit or parts cleaner at a facility, or any source of emissions that is not currently covered by any air permit.
2. Do the following to comply with air permit requirements:
  - Read the air permit to identify applicable requirements for your facility.
  - A Compliance Action Plan (CAP) is prepared by the Environmental Department to summarize air permit requirements. Follow all CAP tasks to maintain compliance.
  - Immediately notify the Environmental Department if there are any deviations from the permit conditions for any reason.
  - Keep a copy of each permit or permit exemption on file at the facility.
  - Follow operating and maintenance procedures for all equipment.
  - If required by permit, conduct leak detection (fugitive emission) monitoring on facility equipment. Consult the facility CAP to determine fugitive emission monitoring and reporting requirements.
  - Keep copies of all documents required by the permit and any agency correspondence in the facility files for a minimum of five years.
  - If required by the permit, maintain equipment operating and inspection logs.

3. The permitting agency has the authority to inspect facilities without prior notification. See Regulatory Inspections procedure for more details.
4. Do not make any physical or operational changes to equipment that has or may need an air permit or permit exemption without obtaining approval from the Environmental Department. Significant increases in operating hours or throughputs may be considered a change in the source's method of operation and may require permitting action.
5. Construction at a facility may not commence until Environmental Department approval is obtained.
6. Consult the CAP for guidance on required reporting of planned or unplanned venting of natural gas.
7. Fugitive emission releases associated with startups and shutdowns may need to be monitored for air permit or emissions inventory requirements. Consult the facility CAP to identify requirements for maintaining records of startups and shutdowns.
8. The Environmental Department will be responsible for filing all emissions inventories, fee payments, permit applications, renewals, and reports to regulatory agencies. Immediately forward all emission inventory forms and copies of other correspondence received from regulatory agencies to the Environmental Department.
9. Title V permits require compliance certification periodically. A designated Company Responsible Official (RO) or Duly Authorized Representative (DAR) is required to certify the compliance status of all permit terms and conditions. Any document required by the Title V permit requires certification by the RO or DAR.

In **Arizona**, unique permit requirements exist for sandblasting, earth moving activities, tracking engine maintenance and use of paints.

### **Compliance Action Plans**

A Compliance Action Plan (CAP) is a summary of air permit requirements for a facility. Developing and revising a CAP is a Company requirement for all facilities operating with a Title V or Construction Air Permit. The Environmental Department is responsible for developing and maintaining the CAP and providing initial training of the CAP requirements. Operations management is responsible for reviewing and understanding the requirements of the CAP.

### **For Further Information**

Refer to the following procedures in this Handbook:

- Activities That Could Require an Air Permit
- Air Emissions Testing by Agencies
- Communication with Regulatory Agencies
- Compliance Action Plans





## Open Burning

### **What is Open Burning?**

"Open burning" is the burning of unwanted materials, such as paper, trees, brush, leaves, grass and other debris, where smoke is released directly to the air. During open burning, air pollutants do not pass through a chimney or stack and combustion is inadequately controlled to prevent air pollution. Because of problems created by open burning, State and local laws strictly control open burning of most materials. Some States allow open burning of debris or open burning for fire training exercises with prior approval.

### **Open Burning Operations**

1. In most States, open burning of any kind is prohibited unless an open burning permit has been issued in advance. Most States prefer that land-clearing debris be sold or recycled on site for wildlife enhancement.
2. Before conducting any kind of open burn, contact the Environmental Department to determine if open burning is allowed and whether a permit is required.
3. The Environmental Department will obtain permission from the appropriate entities (environmental agency, fire marshal, and local agencies) for any open burns.
4. If open burning is allowed, the burn permit will list all conditions and restrictions. Typically, the following restrictions apply:
  - Only dry materials can be burned.
  - A contingency burn plan must be prepared.
  - The fire must be controlled and must be attended at all times until the fire is extinguished.
  - Sufficient fire control equipment and personnel must be onsite to maintain control over the fire.
  - Fires can only be started during daylight hours and most States further restrict open burning to specific hours of the day.
  - Open burning cannot be conducted on windy days. The permit may specify what constitutes "windy" or there may be provisions for checking with the permitting agency.
  - Only approved fire starting materials can be used.
  - As a minimum, all open burning must be conducted at least 100 feet from other flammable materials and at least 1,000 feet from structures located on adjacent properties.
5. Keep copies of permits or correspondence regarding any open burning in the facility files.



## Communication with Regulatory Agencies

### **Responsibilities**

1. Facility Management is responsible for the following types of correspondence but may delegate as necessary:
  - Communication with regulatory agencies as directed by the Environmental Department.
  - Final submittal of discharge monitoring reports completed by the different facilities.
  - Verbal contact during site inspections or other on-site visits from regulatory agencies.
  - Verbal reports to environmental regulatory agencies of spill incidents if the Environmental Department cannot be reached.
  - Verbal contact with the general public should be directed to the Investor-Media Relations Department.
2. The Environmental Department is responsible for the communication outlined below:
  - Verbal reports to environmental regulatory agencies of spill incidents.
  - Routine reports, inventories, and other general routine correspondence with regulatory agencies.
  - Follow-up letters/reports to inspection reports/release incidents.
  - Permit applications, notices, authorizations/approvals, and renewals.
  - Violations, compliance orders, or similar problems.
  - Incidental correspondence with environmental regulatory agencies.
3. Contact the Environmental Department prior to initiating communication directly with regulatory agencies.

### **Written Correspondence**

1. Notify the Environmental Department immediately if you receive any non-routine correspondence from a regulatory agency. Any written correspondence from an agency, including electronic mail (e-mail), should be forwarded to the Environmental Department with a copy retained in the facility's files.
2. Send all agency correspondence certified mail, Federal Express, or equivalent, and retain receipts in the facility files.
3. Send copies of all correspondence with agencies, media and public to the Environmental Department and maintain a copy in the facility records.

### **Phone Communication**

1. Document all telephone conversations initiated by regulatory agencies by completing a written summary that includes:



## Compliance Action Plans

### **What is a Compliance Action Plan?**

A Compliance Action Plan (CAP) is a summary of air permit requirements for a facility. Developing and revising a CAP is a Company requirement for all facilities operating with a Title V or Construction Air Permit. CAPs may also be used to summarize waste or water permit requirements or other regulatory, non-permit specific requirements (e.g., Freon evacuation restrictions, open burning timing). The Environmental Department is responsible for developing and maintaining the CAP and providing initial training of the CAP requirements. Operations management is responsible for reviewing and understanding the requirements of the CAP.

### **CAP Contents**

The information in the CAP includes the following:

- **Action required** such as notifying the agency, conducting an emissions test, submitting a report, or other actions required by the permit.
- **Responsibility** – department responsible for the action item (e.g., Environmental, Mechanical Testing, Operations).
- **Frequency** – this section covers how often an action is required. Some examples are: How often must the report be submitted? How soon must the agency be notified of an excess emission? How often does an emissions test need to be conducted?
- **Due date** for required tasks (all deadline driven CAP action items shall be maintained in MAXIMO).

### **Accessing and Reviewing the CAP**

CAPs are maintained on the Environmental Department servers, intranet sites, and/or facility files. The Environmental Representative shall review the CAP and update whenever there is a change in permit conditions (e.g., additional or reduced monitoring, frequencies), applicable changes in regulatory interpretation, or new requirements become applicable (e.g., NSPS, MACT).

### **For Further Information**

Refer to the following:

- Environmental Department Intranet Site (outside this handbook)
- Facility-specific Compliance Action Plans (outside this handbook)

Notes:

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## Contractor Guidelines

### Contractor Selection

Consult the Environmental Department when selecting contractors and subcontractors for the following activities:

- Asbestos surveys, identification and/or removal
- Disposing or treating hazardous/special wastes
- Laboratories analyzing environmental samples
- PCB characterization, removal, or disposal
- Recycling used oil, filters, batteries, fluorescent light bulbs, and paints and other chemicals
- Spill response
- Transporting hazardous waste or special waste

The contract will be prepared according to Supply Chain Management procedures and Waste and Spill Management Specifications so that it includes Company-approved contract language regarding liability for environmental activities, responsibility for disposing of generated waste, etc.

**! Environmental requirements including Waste Management Plans shall be discussed during the pre-bid meetings, pre-job meetings, and during the post-job inspections.**

### Overview of Contractor Responsibilities

1. Verify the contractor understands the scope of work and job responsibilities, and that work is completed in a safe, timely, and cost-efficient manner.
2. Verify contractors' performance of the following actions:
  - Employees of contractors and subcontractors are properly trained (as required in contract). Proof of employee training (e.g., certification) must be provided upon request.
  - All permits, notifications, or approvals, as required by the Scope of Work (e.g., asbestos removal pre-notification) have been obtained and copies provided to the Company prior to the commencement of work. Copies must be maintained on the work location.
  - Adequate precautions are being taken to eliminate or minimize the potential for harm to human health or the environment.
  - Contractors manage wastes in full compliance with Federal, State, and local regulations, and Company policy.
  - Proper recordkeeping and reporting obligations are being met. Copies of recordkeeping and reporting documentation applicable to the contractor's services must be provided to the Company.

### **Management of Wastes**

During the course of some construction projects, wastes are generated as a result of work the contractor is doing on behalf of the Company. Management of these wastes is described below. The **Project Coordinator** will:

1. During project planning, review waste issues with Division Environmental and Operations to prepare an initial draft of the Waste Management Plan. The Project Coordinator consults with the contractor to finalize the Waste Management Plan as required by the Waste and Spill Management Specifications. The plan will address how wastes will be handled, the procedures to be followed to meet Company requirements, and who will be responsible for labeling, proper storage and inspection of wastes.
2. Meet with the contractor supervisor at the start of the project to review the Waste Management Plan along with all relevant Company procedures for management of wastes.
3. Verify that the contractor uses appropriate containers for wastes and designate storage and disposal facilities where wastes will be stored and disposed before work begins.
4. Inspect contractor operations to verify that all waste handling requirements and relevant Company procedures are being followed. Particularly, check that:
  - Appropriate containers are being used and kept closed or covered;
  - Containers are appropriately labeled to indicate their contents and, if their contents are hazardous, marked with a hazardous waste label;
  - Hazardous waste generated as a result of the work the contractor is performing on behalf of the Company is recorded on the hazardous waste generation and inspection record;
  - Hazardous waste manifests, land disposal restriction forms for hazardous wastes, and non-hazardous waste manifests or bills of lading are properly completed before allowing a shipment of waste to leave the site.
5. Characterize the waste, if necessary, to determine if it is hazardous. The Environmental Department should be consulted to determine the appropriate analytical parameters and sampling protocol.
6. If hazardous waste is generated:
  - Verify the effect on the facility's generator status. If the generator status changes, contact the Environmental Department. This will trigger additional requirements for the facility.
  - Record the amounts of hazardous waste generated on the hazardous waste generation and inspection record.
  - All waste must be transported by Company-approved transporters and disposed at Company-approved disposal facilities.

## Contractor Guidelines

- Hazardous waste generated on the ROW, meter station, or other remote location must be managed at the point of generation. **Consult the Environmental Department prior to transporting hazardous or potentially hazardous waste.**
7. At the conclusion of the project (before contractor personnel are released from the facility), inspect contractor work areas with the contractor supervisor. Make sure that:
- The locations of all wastes from the project that remain at the facility are known and that all wastes that are the contractor's responsibility have been removed or are ready for removal from the facility.
  - Any remaining containers of waste are properly labeled and manifests/bills of lading and Land Disposal Restriction (LDR) forms have been completed as required.
  - The hazardous waste generation and inspection record accurately reflects all hazardous wastes generated by the contractor during the project.
8. Keep copies of all contractor waste management records, including:
- The contractor's waste management plan
  - Waste generation records
  - Waste manifests or bills of lading
  - Permits, approvals or authorizations

The contractor may generate their own waste as a result of a spill of their materials (fuel used by the contractor, oils, solvents). These wastes are managed separately by the contractor.

### ***For Further Information***

Refer to the following procedures in this Handbook:

- Hazardous Waste Management
- Index to Common Wastes
- Non-Hazardous Waste Management
- Project-Specific Binder (outside this handbook)
- Waste Management Planning

Notes:

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## Facility and Right-of-Way Construction, Maintenance and Demolition

### Planning

1. Plan all facility and right-of-way construction and maintenance, providing adequate time for environmental review of the activity. Notify the Environmental Department (using PeopleSoft Input Form [PIF], Project Data Sheets [PDS], Tab B or other methods) for project approvals if your project includes but is not limited to the following:
  - Modification, repair, demolition, or replacement of an existing permitted emission source;
  - New equipment installations;
  - Projects that may impact endangered or threatened species or sensitive areas (archeological or historical resources, dry washes, protected groundwater recharge area, river/stream crossings or wetlands);
  - Construction or maintenance that will involve ground disturbance, including PCB, mercury, or hydrocarbon-impacted soil;
  - Hydrostatic testing of pipe;
  - Fuels or other chemicals will need to be stored temporarily at the work site;
  - Wastes or wastewater will be generated;
  - Modifications to equipment or operations that are covered by permits;
  - Soil or groundwater contamination might be encountered during the project;
  - Demolition of any structure;
  - Removal or disturbance of lead-based paint, asbestos, or PCB-contaminated equipment (e.g., air compressor systems);
  - Tree removal.
2. The Environmental Department is responsible for filing permit applications and other information with regulatory agencies. Depending on the type of permit or authorization required, it may take 12 to 18 months or longer to obtain agency approval for a project that impacts an emission source. Demolition projects require advance notification (10 workdays) to regulatory agencies.
3. Coordinate any required environmental sampling activities with the Environmental Department.
4. Refer any questions about environmental issues from the general public about the project to the Investor-Media Relations Department.
5. Refer any questions from regulators to the Environmental Department.
6. Coordinate land owner notification with the Land Department (Right of Way).



## Labeling

### **Introduction**

All products and wastes shall be clearly labeled. Proper labeling is a regulatory requirement. If labeling is inadequate or illegible, expensive testing may be required to properly identify the material. Replace faded or weathered labels promptly.

### **Products**

All product containers shall be clearly labeled by the manufacturer when purchased. Product containers that are not clearly labeled should not be accepted.

### **Tanks**

At a minimum, all product storage tanks shall be labeled with the tank contents. **To facilitate emergency response, lettering shall be at a minimum 3 inches high and visible from direction of normal approach.** Some State regulations specify label size, orientation and contents; where applicable follow State and local requirements. DOT, NFPA and OSHA labeling may also be required.

Diesel tanks used for motor fuel must have a sulfur content label if the tank capacity is 500 gallons or more.

Used oil tanks must be labeled as "Used Oil", not waste oil or dirty oil, to meet RCRA labeling requirements.

In **Pennsylvania**, used oil tanks are required to be labeled "Waste Oil".

### **Unknown Substances**

- ! Do not approach, sample, or label drums that are leaking or bulging.**
- Contact Safety and Environmental immediately.**

For all other unknown substances, immediately label the container as "Potentially Hazardous Waste Awaiting Characterization" and the date found. Contact the Environmental Department to arrange for sampling and analysis. When the substance is sampled, add a label indicating the date sampled and sample identification number. Re-label the container based on analytical results and guidance by the Environmental Department. Refer to the Hazardous Waste section for inspection requirements, timelines, etc.

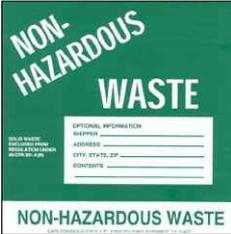
### **Waste**

Label examples for common wastes are shown below. Waste **must** be labeled as soon as it is generated; do not wait for analytical results. If the characteristics of the waste are unknown, label as "Potentially Hazardous Waste Awaiting Characterization". Consult the Environmental Department for specific labeling requirements for your area and to arrange for sampling and analysis.

## Labeling Examples for Common Wastes

Refer to the following table to determine which waste labels may apply to your waste. Contact the Environmental Department if you are unsure which procedure should be followed.

GENERAL

If the Waste is... Examples	Refer to this Procedure...	Labeling
Abrasive Blasting Waste	Sandblasting Media	 <p>NON-HAZARDOUS WASTE</p> <p>OPTIONAL INFORMATION          DISPOSER _____          ADDRESS _____          CITY, STATE, ZIP _____          COMMENTS _____</p> <p>NON-HAZARDOUS WASTE</p> <p>If hazardous waste;</p>  <p>HAZARDOUS WASTE</p> <p>STATE AND FEDERAL LAW PROHIBIT SHIPPERS DISPOSAL OF HAZARDOUS WASTE UNLESS THEY FIRST OBTAIN A LICENSE FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.</p> <p>DISPOSER INFORMATION          NAME _____ PHONE _____          ADDRESS _____ CITY _____ STATE _____ ZIP _____          EPCRA / RCRA REG. NO. _____          STATE NO. _____ COUNTRY OF ORIGIN _____          HAZARDOUS INFORMATION          FEDERAL ID: <input type="checkbox"/> HAZARDOUS PROPERTIES <input type="checkbox"/> CORROSIVE <input type="checkbox"/> TOXIC  <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> LIQUID <input type="checkbox"/> SOLID <input type="checkbox"/> REACTIVE <input type="checkbox"/> OTHER _____</p> <p>DO NOT REPACK OR REUSE THIS CONTAINER FOR ANY PURPOSE.</p> <p>HANDLE WITH CARE!</p>
Abrasive Blasting Waste – Painted Surfaces (possible heavy metals)	Sandblasting Media	 <p>HAZARDOUS WASTE</p> <p>STATE AND FEDERAL LAW PROHIBIT SHIPPERS DISPOSAL OF HAZARDOUS WASTE UNLESS THEY FIRST OBTAIN A LICENSE FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.</p> <p>DISPOSER INFORMATION          NAME _____ PHONE _____          ADDRESS _____ CITY _____ STATE _____ ZIP _____          EPCRA / RCRA REG. NO. _____          STATE NO. _____ COUNTRY OF ORIGIN _____          HAZARDOUS INFORMATION          FEDERAL ID: <input type="checkbox"/> HAZARDOUS PROPERTIES <input type="checkbox"/> CORROSIVE <input type="checkbox"/> TOXIC  <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> LIQUID <input type="checkbox"/> SOLID <input type="checkbox"/> REACTIVE <input type="checkbox"/> OTHER _____</p> <p>DO NOT REPACK OR REUSE THIS CONTAINER FOR ANY PURPOSE.</p> <p>HANDLE WITH CARE!</p>  <p>LAB SAMPLING</p> <p>Sample ID: _____</p> <p>Plant Name/Line Number: _____</p> <p>Description of Contents: _____</p> <p>Date Sampled: _____</p> <p>Sampled By: _____</p>

**Labeling**

<p><b>If the Waste is... Examples</b></p>	<p><b>Refer to this Procedure...</b></p>	<p><b>Labeling</b></p>
<p>Concrete containing spills or leaks</p>	<p>Non-Hazardous Waste PCBs</p>	 <p><b>NON-HAZARDOUS WASTE</b></p> <p>OPTIONAL INFORMATION          NUMBER _____          ADDRESS _____          CITY, STATE, ZIP _____          COUNTRY _____</p> <p><b>NON-HAZARDOUS WASTE</b></p> <p>If needed;</p>  <p><b>CAUTION CONTAINS PCBs</b> (Polychlorinated Biphenyls)</p> <p>A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency regulations, 40 CFR 101. For disposal information contact the nearest U.S. EPA Office.</p> <p>In case of accident or spill, call toll free the U.S. Coast Guard National Response Center: <b>800-424-8802</b></p> <p>Also contact: Telephone number: _____</p>
<p>Empty Container</p>	<p>Empty Containers</p>	 <p><b>EMPTY</b></p>
<p>Pigging Sludges</p>	<p>Hazardous Waste PCBs Pigging Wastes Used Oil</p>	 <p><b>HAZARDOUS WASTE</b></p> <p>STATE AND FEDERAL LAW PROHIBIT IMPROPER DISPOSAL OF HAZARDOUS WASTE. THE HIGHEST GRADE OF PUBLIC SAFETY ACHIEVED BY THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCES CONTROL.</p> <p>IDENTIFICATION INFORMATION:          NUMBER _____          NAME _____          CITY _____ STATE _____ ZIP _____          EPA / NUMBER _____          FEDERAL NO. _____          EPA _____          ADDRESS _____          CONTAINER DESCRIPTION: <input type="checkbox"/> LIQUID <input type="checkbox"/> SOLID <input type="checkbox"/> GAS  <input type="checkbox"/> SOLID <input type="checkbox"/> LIQUID <input type="checkbox"/> GASEOUS <input type="checkbox"/> OTHER</p> <p><b>HANDLE WITH CARE!</b></p>  <p><b>LAB SAMPLING</b></p> <p>Sample ID: _____</p> <p>Plant Name/Line Number: _____</p> <p>Description of Contents: _____</p> <p>Date Sampled: _____</p> <p>Sampled By: _____</p>



**Labeling**

<p><b>If the Waste is... Examples</b></p>	<p><b>Refer to this Procedure...</b></p>	<p><b>Labeling</b></p>
<p>Soils containing spills or leaks</p>	<p>Hazardous Waste Non-Hazardous Waste PCBs</p>	<div data-bbox="707 235 941 479" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;"><b>NON-HAZARDOUS WASTE</b></p> <p><small>THIS LABEL IS REQUIRED FOR ALL NON-HAZARDOUS WASTE</small></p> <p><small>OPTIONAL INFORMATION</small></p> <p>SHIPPER: _____</p> <p>ADDRESS: _____</p> <p>CITY, STATE, ZIP: _____</p> <p>CONTENTS: _____</p> <hr/> <p style="text-align: center;"><b>NON-HAZARDOUS WASTE</b></p> </div> <p>If contaminated with potentially hazardous material;</p> <div data-bbox="707 519 941 755" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;"><b>POTENTIALLY HAZARDOUS WASTE AWAITING CHARACTERIZATION</b></p> <p style="text-align: center;"><b>HANDLE WITH CARE</b></p> <p>Accumulation Start Date: _____ <small>(Date waste first put into container)</small></p> <p>Project ID/Name: _____</p> <p>Description of Contents: _____</p> <p style="text-align: center;"><b>DO NOT RELEASE FOR DISPOSAL UNTIL APPROVED BY ENVIRONMENTAL DEPARTMENT</b></p> </div> <div data-bbox="707 779 941 1015" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;"><b>LAB SAMPLING</b></p> <p>Sample ID: _____</p> <p>Plant Name/Line Number: _____</p> <p>Description of Contents: _____</p> <p>Date Sampled: _____</p> <p>Sampled By: _____</p> </div>
<p>Universal Waste</p>	<p>Batteries Light Bulbs Mercury</p>	<div data-bbox="707 1063 941 1299" style="border: 1px solid black; padding: 5px;"> <p style="text-align: center;"><b>UNIVERSAL WASTE</b></p> <p><small>FEDERAL LAW PROHIBITS IMPROPER DISPOSAL. THE FOLLOWING MATERIALS ARE REGULATED AS UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273.</small></p> <p><input type="checkbox"/> UNIVERSAL WASTE – BATTERY</p> <p><input type="checkbox"/> UNIVERSAL WASTE – MERCURY THERMOSTATS</p> <p><input type="checkbox"/> UNIVERSAL WASTE – PESTICIDES</p> <p><input type="checkbox"/> UNIVERSAL WASTE – FLUORESCENT LAMPS <small>(incandescent)</small></p> <p>ACCUMULATION START DATE: _____</p> <p>_____</p> <p>_____</p> <p><small>DO NOT PRINT OR SHIP THIS LABEL TO A NEW LOCATION WITH THE WASTE. ORDERED BY: _____ THE ANTI-DRIFT DEVICE IS A SERVICE OF EL PASO INDUSTRIES, INC. (72120)</small></p> <p style="text-align: center;"><b>HANDLE WITH CARE!</b></p> </div>



## MAXIMO

### **About MAXIMO**

MAXIMO is a computer-based scheduler used to plan and track recurring, frequency-driven tasks. Environmental tasks are entered into MAXIMO as site-specific preventive maintenance (PM) tasks linked to environmental corporate job plans.

### **When to Use MAXIMO**

A MAXIMO PM is required for:

- All recurring, frequency-driven permit deadlines (e.g., 5-year permit renewal, quarterly testing, semi-annual compliance certification reports)
- All recurring regulatory deadlines (e.g., SARA Tier II)
- Tracking other environmental deadlines (e.g., temporary air permit requirements such as emergency generator reporting, as applicable)
- Recurring Company policy tasks (e.g., drinking water testing, facility audits)

MAXIMO may also be used to track other recurring tasks or one-time environmental tasks for which a record is desired.

### **Coding Requirements**

The way a PM is set up in MAXIMO is essential to allow efficient database searching and generation of reports. The following are Environmental task-specific requirements for setting up PMs in MAXIMO.

- All PMs shall specify a due date (NTE date). This will be the permit or regulatory deadline. For non-regulatory driven tasks, the due date will be set by the Company policy or the Environmental Department.
- All regulatory or permit-driven tasks shall be linked to an Environmental Corporate Job Plan (CJP) beginning with "EN". A list of available CJPs can be obtained from the Division Maintenance Planner.
- The PM description shall include the location (station name or reference) and the task description.
- The PM will identify a specific responsible person.
- The Lead Craft will be specified as environmental to indicate the type of work, not the craft of the responsible person.

### **Completing and Closing Work Orders**

1. The responsible person listed on the environmental work order shall update the status of the work order as needed until the work is completed, but shall NOT close a work order.
2. The completion date will be the date that the work was actually completed. The actual completion date is required so the records can be used to verify compliance with regulatory deadlines.



## Regulatory Inspection Guidelines

### **Types of Environmental Inspections**

Three types of regulatory inspections are discussed in this procedure:

- Unannounced inspections, where regulatory agency personnel arrive at the facility for an inspection without giving prior notice. Refer to the Air Emissions Testing by Agencies procedure in this handbook for a discussion on unannounced agency emission testing.
- Announced inspections, where advance notice of an upcoming inspection is sent by the regulatory agency.
- Inspections under a search warrant.

### **Preparing for Inspections**

- ! **Before allowing an inspector entry to the facility, request identification (e.g., photo ID, not a business card). Make a copy of the inspector's credentials for the files.**

### **Unannounced Inspection**

1. Notify Facility Management, or a designee, immediately when a regulatory agency inspector arrives to conduct an unannounced inspection. All questions must be referred to Facility Management, or a designee, who will serve as the Company spokesperson during the inspection.
2. Notify Environmental Department as soon as possible.
3. Review the purpose and scope of the inspection with the agency representative. Limit the inspection to those areas identified in the scope and within that agency's jurisdiction.

### **Announced Inspection**

1. Notify your immediate Manager and the Division Environmental contact as soon as you are aware that an announced environmental inspection will take place at your facility.
2. Review the following list to determine the scope of the inspection:
  - Which agency will be conducting the inspection;
  - The purpose and/or basis of the inspection;
  - The authority of the agency to conduct the inspection;
  - Who will be present;
  - When it will take place;
  - How long it will last;
  - What records will be reviewed;
  - What samples will be collected, if any; and
  - What portions of the facility will be inspected.

3. Arrange for Facility Management or someone thoroughly familiar with the facility to be available to participate in all phases of the regulatory inspection.
4. If some areas of the facility are unsafe or off-limits due to maintenance or other reason, inform the inspector that access to those areas will not be allowed.
5. Inform agency representatives of facility personal protective equipment (PPE) requirements so that PPE will not have to be provided to agency representatives during the site inspection.
6. Be familiar with:
  - Regulations that apply to the topic of the inspection (e.g., permits and recordkeeping requirements);
  - Permits/exemptions/waivers for your facility;
  - Status of any outstanding litigation on environmental matters and/or regulatory compliance actions;
  - Previous deficiencies and corrective actions taken; and
  - Location of files that pertain to the topic of the inspection.
7. Do a "housekeeping check" of the facility. Good facility housekeeping can minimize inspections that go beyond their original purpose.
8. Prepare for the inspection by compiling files and records subject to review during the inspection.
  - ! **Files that have been designated and stamped as "Confidential-Attorney Work Product" or "Attorney-Client Privileged" are not subject to inspection.**
  - Files that contain confidential business information, such as special processes or trade secrets, are subject to inspection. Request that these files be treated as privileged by the inspecting agency.
9. Inform all facility employees in advance of the time and date of the inspection.

#### ***Inspection under a Search Warrant***

1. Obtain and review a copy of the search warrant. Allow the agent access to only those areas covered by the search warrant. Immediately contact Facility Management and the Legal Department and provide a copy of the search warrant by facsimile if possible.
2. Verify the search warrant specifies the location and scope of the search, and that the scope of the warrant is strictly complied with. Compliance with the warrant is mandatory; however, the Company can insist that the search conform to the terms of the warrant which includes the right of Facility Management or a designee to:
  - Receive a copy of the warrant;
  - ! **Withhold documents marked "Confidential-Attorney Work Product" or "Attorney-Client Privileged" pending review and consultation with counsel;**

- Object to inspector's request for documents or for access to facilities and property which are outside the scope of the warrant;
- Observe the execution of the warrant;
- Exercise the right to not answer the investigator's question (for example, if an answer or information to a question is not known, simply state that the information requested would be better provided by a Company management or Legal Department representative);
- Obtain a receipt or inventory of any documents, samples and other items taken; and
- Obtain split samples of materials removed.

### ***During the Inspection***

1. Request identification of the agency inspector (e.g., photo ID). Make a copy of the credentials for the file.
2. Before beginning the inspection, record the following information:
  - Inspection specifics such as the type, time, reason and/or authority for conducting the inspection
  - Federal, State or other inspection
  - Agency represented and office address, telephone number, etc.
  - Inspector's name and title
  - Obtain and attach copies of agency back-up paperwork, if any
3. Request that the inspection not be started until either Facility Management or a designee is present. The inspector is not required to wait and may choose to proceed with the inspection.
4. Have the agency inspector wait in the Company office waiting area until Facility Management or a designee is available. Do not leave the agency inspector unattended at any time. If available, offer the use of a desk and telephone while waiting for Facility Management.
5. Make a list of the records the inspector has requested to review. Note the time periods of the records.
6. Copies of any requested records not specifically required by permit conditions should be provided to the inspector only after approval is given by the Environmental or Legal Department. Make copies of all documents that were copied for the inspector and send to the Environmental Department. Never allow original documents to be removed from the facility.
7. Inform the inspector about the location's safety requirements and devices such as fire eyes, alarms, exit locations, ESD systems, etc.
8. Verify that the inspector has PPE required for areas that will be inspected. If available, common safety gear designated for visitors, such as safety glasses, hard hat, hearing protection, fire resistant clothing, etc., may be provided to the inspector.

**Important: Do not allow inspectors access to facility areas where PPE is required unless they have the required PPE or it has been provided to them, or where operating conditions or maintenance activities make entry unsafe.**

9. Accompany the inspector at all times and limit direct communication with other facility employees, unless requested by the inspector. Take detailed notes of actions and conversations.
10. Remain cooperative and cordial throughout the inspection and answer all questions truthfully. If you are unable or unsure of an appropriate answer, do not speculate. Inform the inspector that you will obtain and provide the information as soon as possible. Do not volunteer information.
11. Minimize non-essential employee involvement.
12. Review all requested documents. Do not allow inspectors access to privileged documents without approval from Legal Department and request these documents be marked as "Privileged" or "Confidential".

**Important: Privileged or confidential documents should be marked as such and separated from other routine files, if possible.**

13. Provide only the specific files and records requested in accordance with the agreed upon scope of the inspection.
14. Limit the scope of the inspection to terms previously agreed upon or as provided for in the search warrant (if presented).
15. Take the same photographs as the inspectors. Do not allow flash equipment in areas where flash could activate fire detection systems, or where a spark could cause a safety concern (i.e., the camera may not be intrinsically safe). If a camera is not available, request duplicate photographs, at the Company's expense, from the inspector. Photographs that divulge trade secrets should not be allowed.
16. If samples are collected, request a split sample (portions of the samples collected by the inspector) and have analyzed for the same parameters. Obtain copies of the inspector's Chain-of-Custody and analytical request form. If a split sample is not feasible, collect a sample at the same location immediately after the inspector has collected a sample. Use the appropriate type of container and preservatives.

#### ***After the Inspection***

1. Request an exit conference with the inspector to discuss the following: any problems, violations or probable violations. Ask for recommendations for improvement.
2. Confirm what records were reviewed.
3. Confirm what records are to be provided.
4. Confirm the list of questions for which answers will be provided later.
5. Confirm the date when the information will be provided.





## Sampling and Analysis

### **About Sampling and Analysis**

Prior to initiating sampling for environmental considerations, review the applicable analytical requirements with your Environmental representative. Special training, sample collection or preservation techniques, detection limits, or test methods may be required. Do not use samples collected for other applications (e.g., corrosion) to fulfill environmental analytical requirements.

Analytical results shall be reviewed promptly to determine if any special response is required (e.g., agency notification, storage time limits).

### **Prior to Collecting a Sample**

Prior to collecting samples, determine:

1. Whether any special training is necessary to collect the sample;
2. Sample matrix – soil, water, sludge, oil or surface contaminants;
3. Analytical parameters – e.g., metals, PCBs or waste characteristics;
4. Appropriate EPA analytical method – e.g., EPA Method 8082 for PCBs;
5. Number of samples required to be representative of the material;
6. Sample preservation and retention requirements (some samples must be analyzed within hours of collection);
7. Turnaround time requirements (how soon are analytical results needed).

Once the above information has been determined, contact the laboratory and request a sampling kit prior to initiating any sampling.

### **Types of Sampling**

**Grab Samples:** Grab samples are taken from one location or portion of the material being sampled. A grab sample is appropriate when the material is consistent throughout and does not vary in composition.

**Composite Samples:** Composite samples are appropriate when a material is not consistent and varies in composition (e.g., sandblasting of equipment painted with different paints during different time periods). A composite sample is collected from various locations and combined into one sample for analysis. A sufficient number of samples must be collected and composited so that a representative sample of the material is obtained.

**! Once the sample has been collected, do not add any material to the container without prior approval from the Environmental Department.**

### **Sample Labeling**

At a minimum, label all sample containers with a unique sample identifier, for example an ID Name or Number that corresponds with the identifier on the Chain-of-Custody form. Mark all sample containers with an indelible marker, e.g., Sharpie™.

### **Sample Preservation and Holding Times**

Sample preservation is critical when analyzing for certain constituents.

For samples that require chemical preservation,

- Request the lab to provide preservatives as needed;
- Use caution when handling preservatives as they may be harmful if contacted or inhaled;
- Never pre-rinse, submerge, or overfill a container with an included preservative as the resulting dilution will reduce its effectiveness.

Samples may need to be maintained at a certain temperature prior to analysis.

- The general preservation temperature recommended by EPA is 39 degrees F upon arrival at the laboratory.
- Follow laboratory-recommended preservation methods. One commonly used method is to double-bag using Zip Lock™ freezer bags filled with ice packed around the samples, to maintain the required temperature until they are received by the lab. The double Zip Lock™ freezer bag should contain any melted ice.
- As a general rule, do not use blue ice or any other type of synthetic cooling as these materials are not efficient at maintaining temperatures. Ice continues to cool even after it has melted. Some materials do not require preservation; check with the Laboratory concerning samples of oil and dry solids.
- All EPA testing methods have specific holding times from when the sample was taken to when the analysis has been initiated. If a holding time for a sample has been exceeded, it is recommended that a new sample be collected and submitted.

**! Test results from analyses completed beyond the required holding time or outside the temperature requirements may be considered invalid by EPA or other regulatory agencies.**

### **Chain of Custody**

The Chain-of-Custody (COC) form is used to identify analytical needs and assign unique identity characteristics to individual samples. It provides documentation regarding the description of the sample, date and time the sample was taken, who took the sample, any preservatives used, sample container types, and the sample identifier. Additionally, the COC helps track who handled the samples in transit in case there is an abnormality in handling or timing. A COC form is usually included in the sampling kits received from the Laboratory.

### **Sample Packing and Shipping**

Pack samples in the cooler provided by the lab. Surround the sample containers with sufficient packing to prevent movement or breakage during shipment, e.g.,

## Sampling and Analysis

Styrofoam™ popcorn or bubble wrap. Place the completed chain of custody in a Zip Lock™ bag and tape it to the inside top of the cooler.

**! Do not use newspaper, shredded paper or vermiculite products as packing material.** These materials lose their cushioning ability when wet and may release ink that would potentially contaminate the samples.

If provided, seal the cooler with a custody seal. Seal the top of the cooler and around the circumference of the lid of the cooler with packing tape. Verify that the cooler meets DOT packaging specifications; over-packing may be required. Be sure to sign all required documentation before shipping the cooler. The custody seal on sample bottles and coolers generally requires a signature or initials.

Prepare a shipping label for the cooler. Samples should be shipped via an overnight delivery service, i.e. Federal Express or UPS. Both of these services have tracking systems that meet COC requirements and are not required to sign the COC.

**! Laboratory samples containing hazardous materials must be declared to the shipper and labeled with the appropriate DOT identifiers.**

Review the DOT Compliance Service's HazMat Sample Shipping Guide.

### **Decontamination**

Use disposable sampling equipment whenever possible. The sampling equipment can be put in the facility general trash unless it was used for hazardous waste sampling. Equipment used to sample hazardous waste must be managed as a hazardous waste.

Any non-disposable equipment used for sampling must be decontaminated after use. Use deionized water and non-phosphorus soap to clean the equipment. The deionized water-and-soap rinsate should be handled in the same manner as the material sampled. In most cases it would be placed in the same container with the sampled material.

### **For Further Information**

Refer to the following procedures in this Handbook:

- DOT Compliance Service's HazMat Sample Shipping Guide (outside this handbook)
- Hazardous Waste Management
- Spill and Release Control, Cleanup and Reporting
- Waste Characterization

Notes:

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## Transfer of Property or Equipment

This procedure does not apply to equipment rented locally from a retail vendor or to inter-corporate exchange of assigned asset equipment (backhoes, tractors, etc.).

### **Property Transfer**

1. Notify the Environmental Department as soon as practical whenever a property will be bought or sold, leased or traded.
2. Provide the following information to the Environmental Department:
  - The type and proposed date of the transaction
  - The persons or companies involved in the transaction
  - The location of the property
  - The current use and intended use of the property
  - Types of neighboring projects
3. The Environmental Department will arrange to conduct any environmental studies (e.g., due diligence) that will be needed in association with the property transfer.
4. Transfer of leased Right-of-Way (ROW) properties will be handled by the Land Department.

### **Equipment Transfer**

1. Contact the Environmental Department before transferring equipment with potential contaminants to any entity inside or outside the Company. Equipment includes, but is not limited to the following:
  - Combustion or process equipment
  - Compression equipment
  - Pipe and associated equipment
  - Tanks
2. This procedure is particularly directed at the transfer of equipment that may contain any of the following:
  - Asbestos
  - Lead paint
  - Mercury
  - Naturally-occurring radioactive material (NORM)
  - Polychlorinated biphenyls (PCBs)
  - Refrigerants
  - Waste material in tanks or other containers associated with the equipment



## Weed and Pest Control

### ***Use of Approved Pesticides***

All references to pesticides in this procedure include "herbicides" which are considered to be a subset of "pesticides".

1. **Do not use any pesticide unless it is approved for use by the Environmental Department.**
2. As a general rule, use only State-licensed personnel to apply pesticides. However, some States do not require a license for Company personnel to apply pesticides on Company-owned or leased property (e.g., easements, meter stations and pipeline right-of-ways). Check with the Environmental Department to determine if a license is required in your State for the product you intend to use and for the application at hand.
3. Use all pesticides strictly in accordance with label directions. Failure to follow manufacturer directions when using pesticides is a violation of Federal law.
4. Restrict the use of pesticides in or near wetlands or water bodies. Take precaution and follow manufacturer label and directions when using pesticides near wetlands or water bodies.
5. The Environmental Department shall be notified of proposed pesticide application where project approval is required, e.g., PIF.
6. Pesticide product MSDS must be accessible and readily available.
7. Employees who handle pesticides are required to read the MSDS.
8. Notify the Property Rights Department prior to any application of pesticides on the right-of-way or other land not owned in fee by the Company.
9. Use appropriate personal protective equipment (PPE) while working with pesticides.
10. Do not reuse empty pesticide containers. Containers must be triple-rinsed and properly disposed. The rinsate should be used in the same manner as the pesticide.
11. There may be specific landowner requirements for application of pesticides on lands belonging to the Bureau of Land Management, the State, or tribes.

In **California**, there are special pesticides handling requirements. Contact the Environmental Department.

### ***For Further Information***

Refer to the following procedures in this Handbook:

- Empty Containers
- General Trash



## Spill and Release Control, Cleanup and Reporting

### **What is a Spill or Release?**

A spill is an unauthorized release of product, raw materials, chemicals or waste outside any secondary containment and into the environment. Spills can occur as a result of leaks, accidents or third party incidents. Spills that occur inside of secondary containment are not considered spills to the environment and are not subject to agency notification. Nonetheless, spills should still be reported to the Environmental Department and the procedures listed below should be followed.

### **Spill or Release Reporting Procedures**

1. Begin spill response and reporting activities upon finding a spill or release to the environment. Notify Facility Management and the Environmental Department as soon as practicable.
2. Report any spill or release of the following materials regardless of location (on-property or off-property) to the Environmental Department:
  - Oil or petroleum products
  - Produced water/brine
  - Hazardous substances or hazardous wastes
  - Chemicals
  - Unplanned natural gas (flaring or venting) if required by permit or State regulation
  - Asbestos-containing materials
  - Smoke or excessive opacity
3. Be prepared to give the following information to the Environmental Department:
  - The identity of the material released;
  - Estimate of the quantity released;
  - The location, time, and date the release occurred or was discovered;
  - Description of how the release occurred (e.g., equipment failure);
  - The extent of injuries, if any;
  - Possible hazards to human health or the environment outside the facility;
  - Immediate action taken in response to the release;
  - Names and numbers of the persons to be contacted for further information.
4. If applicable, follow any additional spill notification procedures in your facility Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure.
5. The following releases require immediate (**within 1 hour of discovery**) notification to the National Response Center (NRC):
  - Any petroleum product released into streams, rivers, lakes or dry washes

- A release that exceeds the reportable quantity (RQ) of any CERCLA hazardous substances in any 24-hour period which is not fully contained
  - A release of a hazardous substance or hazardous waste which occurs during transportation
  - A release of hazardous waste which contains a reportable quantity of a hazardous substance
6. The Environmental Department is responsible for making initial notifications of RQ releases to applicable regulatory agencies and for handling any follow-up reporting requirements. Facility Management is responsible for verbal reports to agencies if the Environmental Department cannot be reached.
  7. Reportable Quantity spill events will be entered into the Company's Comprehensive Incident Report Tracking System (CIRTS) and updated as needed for ongoing cleanups.

### **Initial Spill or Release Response**

1. **! Be sure that Company personnel responding to a release have the appropriate level of training and the proper Personal Protective Equipment (PPE).**
2. Eliminate or control the spill or release by closing valves, blowing down, or other means.
3. Initiate Emergency Operating Procedures (EOP) as appropriate.
4. Identify media (e.g., soil, water, etc.) affected by the spill and the exact location, e.g., legal description.
5. Identify the material spilled or released. The MSDS may provide information about the material spilled and the proper safety precautions to use.
6. Alert personnel of danger and evacuate personnel and/or public from the areas where there may be an immediate danger to life or health. Emergency responders may need to be used to evacuate public areas where conditions warrant.
7. Barricade or isolate the spill area as needed to keep unauthorized personnel out.

### **Spill or Release Control and Cleanup**

1. To prevent pollutants from entering storm water runoff, routine housekeeping should include the removal or remediation of hydrocarbon impacted soil/gravel.
2. Control and clean up the spill or release using procedures outlined in your facility's Spill Prevention, Control and Countermeasures (SPCC) Plan, Blowout Contingency Plan or Emergency Operations Procedure, if applicable. The minimum response activities include:
  - Contact the Safety Department or refer to the MSDS for help in the selection and use of PPE.
  - Assemble the required response equipment including protective clothing and gear, heavy equipment (e.g., backhoe), absorbent material (e.g.,

## Spill and Release Control, Cleanup and Reporting

cement, oil absorbent, pads, sand), and empty DOT-approved containers (e.g., drums).

- Contain the spill area using booms, soil berms, ditches, or similar means.
  - Remove all absorbed material or liquid contained by diking and place in DOT-approved containers. Use pumps as needed.
  - Use rags and cleansing agents as needed to clean spill response equipment.
  - Decontaminate all reusable equipment and place decontamination wastes in containers.
  - Label all containers properly.
  - Transfer all containers to a temporary and secure storage area or the facility-designated waste storage area.
  - Arrange with the Environmental Department for help in sampling spill wastes and their proper disposal.
  - Replace used spill kit response equipment with new equipment.
3. Keep a copy of any required report and all other documents associated with a spill or release including Federal, State and local forms in the facility SPCC or Spills & Releases files.

### **For Further Information**

Refer to the following procedures in this Handbook:

- Air Permits
- Asbestos
- Emergency Operations Procedure (EOP) (outside this handbook)
- Facility Spill Prevention, Control and Countermeasures (SPCC) plan (outside this handbook)
- Labeling
- Sampling and Analysis
- Waste Characterization

Notes:

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## Aboveground Storage Tanks (ASTs)

### **About Aboveground Storage Tanks**

Aboveground storage tanks (ASTs) may be regulated by the State and local fire departments. These regulations may differ from the Federal regulations in terms of: types of chemicals regulated; construction and operational standards; more stringent secondary containment requirements; or registration requirements. Currently, registration of ASTs is not required at the Federal level.

For SPCC-regulated tanks, refer to the SPCC procedure and facility SPCC plan.

### **Inspection of Aboveground Storage Tanks**

At a minimum, periodically:

- Verify all tanks are properly labeled as specified below;
- Inspect tanks, piers and aboveground piping for evidence of deterioration;
- Inspect tank area and nearby surface waters for evidence of a spill;
- Verify availability and condition of spill response equipment; and
- Address any corrective action required.

### **Inspection of Secondary Containment Structures**

Some States require secondary containment for tanks not subject to SPCC regulations. In addition, certain permits may also have requirements for secondary containment. Follow State or permit requirements for secondary containment inspections.

Secondary containment is not required around aboveground storage tanks that are not subject to a permit or rule. For temporary storage in frac tanks, secondary containment is not required unless the tank contains oil and is located at a facility subject to SPCC regulation.

If a non-regulated tank has a secondary containment area, at a minimum, periodically inspect it for the following:

- Evidence of cracks, erosion or other failure. Schedule maintenance to restore dike integrity;
- Evidence of spills;
- Precipitation inside the containment area. A permit or drainage record may be required to discharge accumulated rain water. Otherwise, if no sheen is visible, remove rainwater as soon as possible;
- Operational status of drainage or gate valves. Drain valves should be closed;
- Presence of debris, e.g., tree limbs, within the diked or bermed area. Remove debris;
- Pipes, inlets, drainage beneath tanks, etc. for leaks or structural flaws that may lead to leaks.

**Labeling Requirements**

1. Letters must be a minimum of 3 inches high and visible from the direction of normal approach for emergency response purposes.
2. All diesel storage/dispensing tanks of 550 gallons or greater capacity (above ground or buried) must be labeled as one of the following three categories:
  - Non-Highway Diesel Fuel (May Exceed 500 ppm Sulfur)
  - Low Sulfur Highway Diesel Fuel (500 ppm Sulfur Maximum)
  - Ultra-Low Sulfur Highway Diesel Fuel (15 ppm Sulfur Maximum)

**For Further Information**

Refer to the following Procedures in this Handbook:

- Hazardous Waste Management
- Labeling
- Non-Hazardous Waste Management
- Oily Water
- Product Storage
- SPCC Plans
- Spill and Release Control, Cleanup and Reporting
- Used Oil

Notes:

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## Chemical Inventory and SARA Reporting

### **What is a Hazardous Chemical?**

The EPA requires that facilities maintain a list of hazardous chemicals and report the storage and use of chemicals based on their quantity and hazardous nature. EPA adopts the OSHA definition of hazardous chemical as any chemical that is a physical or health hazard. EPA has developed a specific list of extremely hazardous substances (EHS) and their threshold planning quantities (TPQ). The Material Safety Data Sheet (MSDS) will indicate any component in the material that is a hazardous chemical or EHS (e.g., sulfuric acid and chlorine). Do not use any new hazardous chemical unless there is an MSDS on file.

### **Hazardous Chemical Inventory**

1. Each facility must maintain a hazardous chemical inventory. This inventory must include information on all hazardous chemicals and mixtures present on site.
2. Notify the Environmental Department if any new or existing hazardous chemical or EHS reaches its TPQ even for a short period of time.
3. The Federal TPQ for hazardous chemicals is 10,000 pounds. The TPQs for EHS are significantly less, e.g., 1,000 lbs. for sulfuric acid, 500 lbs. for anhydrous ammonia, and 100 lbs. for chlorine.
4. The appropriate agencies must be notified within 3 months of the date the TPQ is exceeded, even if the change is temporary (e.g., during battery change-outs, the amount of sulfuric acid at a facility may double for a short time period).
5. Update the Facility Chemical Inventory whenever a new hazardous chemical is brought on-site or use of a hazardous chemical is discontinued. The inventory should be reviewed at least annually.
6. Keep a copy of the most recent Facility Chemical Inventory at the facility.

### **SARA Tier II Reporting**

EPA requires reporting of the storage and use of hazardous and extremely hazardous chemicals at each facility based on the quantity and hazardous nature of the chemical. SARA Tier II reports must be filed with the State Emergency Response Commission and Local Emergency Planning Committee by March 1 annually.

### **For Further Information**

Refer to the following procedures in this Handbook:

- Batteries
- Communication with Regulatory Agencies
- Waste Management Planning

Notes:

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## Product Storage

### About Product Storage

Product storage refers to bulk liquid products, typically stored in the original manufacturer or shipping containers, like methanol, paint, solvents, etc., or gasoline stored in smaller containers for use in tools and equipment.

1. Make sure all product storage drums and other containers are clearly labeled.
2. Store product containers as follows:
  - Keep containers of products in designated storage areas. Storage areas shall be indoors or in covered secondary containment. (Covering can include roof structures, e.g., car ports, drum lid covers or waterproof tarps.) Products which are stored horizontally and on racks are not required to be covered but must be maintained in a manner which prevents leakage.
  - Keep containers larger than 5 gallons (e.g., carboys, drums, pails) in secondary containment. Examples of secondary containment include paint cabinets with a lip near the bottom, containment pallets, stock tanks and berms, and buildings which can contain minor spills. Containment must be sufficiently impervious to prevent a release to the environment.
  - For temporary storage in frac tanks, secondary containment is not required unless the tank contains a petroleum product and is located at a facility subject to SPCC regulation.
  - Keep lids tightly closed on product containers when they are not in use.
  - Place drip pans under spigots or dispensers. If possible, return drips of product back to the container for reuse.
  - Minimize the number of product containers by combining partial containers of identical materials when possible. Handle empty product containers using the "Empty Containers" procedure.
  - Provide aisle space between drum rows that will permit easy access for emergency equipment.
  - Make an effort to use products before expiration dates.
  - Periodically review the facility for any unwanted or expired products. Contact the Environmental Department for disposal options.
  - Keep spill control and cleanup equipment in the vicinity of product storage areas and immediately cleanup any spills in the area, according to the "Spill and Release Control, Cleanup and Reporting" procedure.
  - Regularly inspect product storage areas to make sure that they are clean, that the product label is legible, and that there are no damaged or leaking containers. Remove empty containers as needed. Contact the supplier to arrange for replacement of any product containers that are damaged or leaking.
  - Due to SARA reporting requirements, contact the Environmental



## SPCC Plans

### ***When an SPCC Plan is Needed***

A Spill Prevention, Control, and Countermeasure (SPCC) Plan is required for a facility which meets **both** of the following criteria:

- The aggregate oil storage capacity is greater than 1,320 gallons aboveground or 42,000 gallons in underground storage. Bulk oil storage capacity includes all oil storage tanks, containers, drums, and mobile or portable totes with capacities of 55 gallons or more. The total capacity of an oil storage container is used to determine oil storage capacity, not the amount of oil actually in the container.
- There is a reasonable expectation of an oil discharge into or upon navigable waters of the United States or adjacent shorelines. This determination is based solely on the location and geographic aspects of the facility and does not take into consideration any man-made features. Navigable waters may include intermittent streams, ditches, arroyos, storm or sanitary sewers, wetlands, mudflats, and sandflats.

For facilities not meeting the SPCC Plan requirements, document the exemption in the facility files.

### ***Elements of an SPCC Plan***

An SPCC plan must include:

- An inventory of regulated oil-containing tanks and equipment.
- A written description of past spills from the facility, the corrective action taken, and plans for preventing recurrence.
- Predictions of the direction, rate of flow, and total quantity of oil that could potentially be discharged from the facility into waters of the U.S.
- A description of secondary containment and equipment at the facility to prevent discharged oil from reaching waters of the U.S.
- A listing of plant emergency personnel and a list of outside emergency services, e.g., local police and fire departments.
- An integrity testing provision or exemption documentation for tanks.
- An annual training program and documentation of the training.

### ***Secondary Containment***

Adequate secondary containment is required for SPCC-regulated tanks and some oil-containing equipment (e.g., crankcases are exempt). Secondary containment around the oil storage areas should be constructed to contain the volume of the largest tank within the secondary containment plus ten percent to allow for sufficient freeboard to account for rainwater. Temporary storage of oil-containing liquids in frac tanks requires secondary containment if the facility or tank is subject to SPCC regulations.

**NOTE: Storage of drums in secondary containment reduces the capacity of the secondary containment.**

Effective secondary containment means that the structure must be capable of containing oil and sufficiently impervious to prevent discharges from the containment system until it is cleaned up. Examples of acceptable secondary containment include:

- Concrete dikes with a concrete bottom
- Galvanized steel rings with or without a synthetic liner
- Earthen berms
- Storm water basins

***Inspections and Maintenance***

Tanks and secondary containment areas must be inspected at least monthly. Conduct maintenance and repairs promptly. Record the results of the inspection and any corrective actions taken; maintain the documentation in the facility files.

***Training and Records***

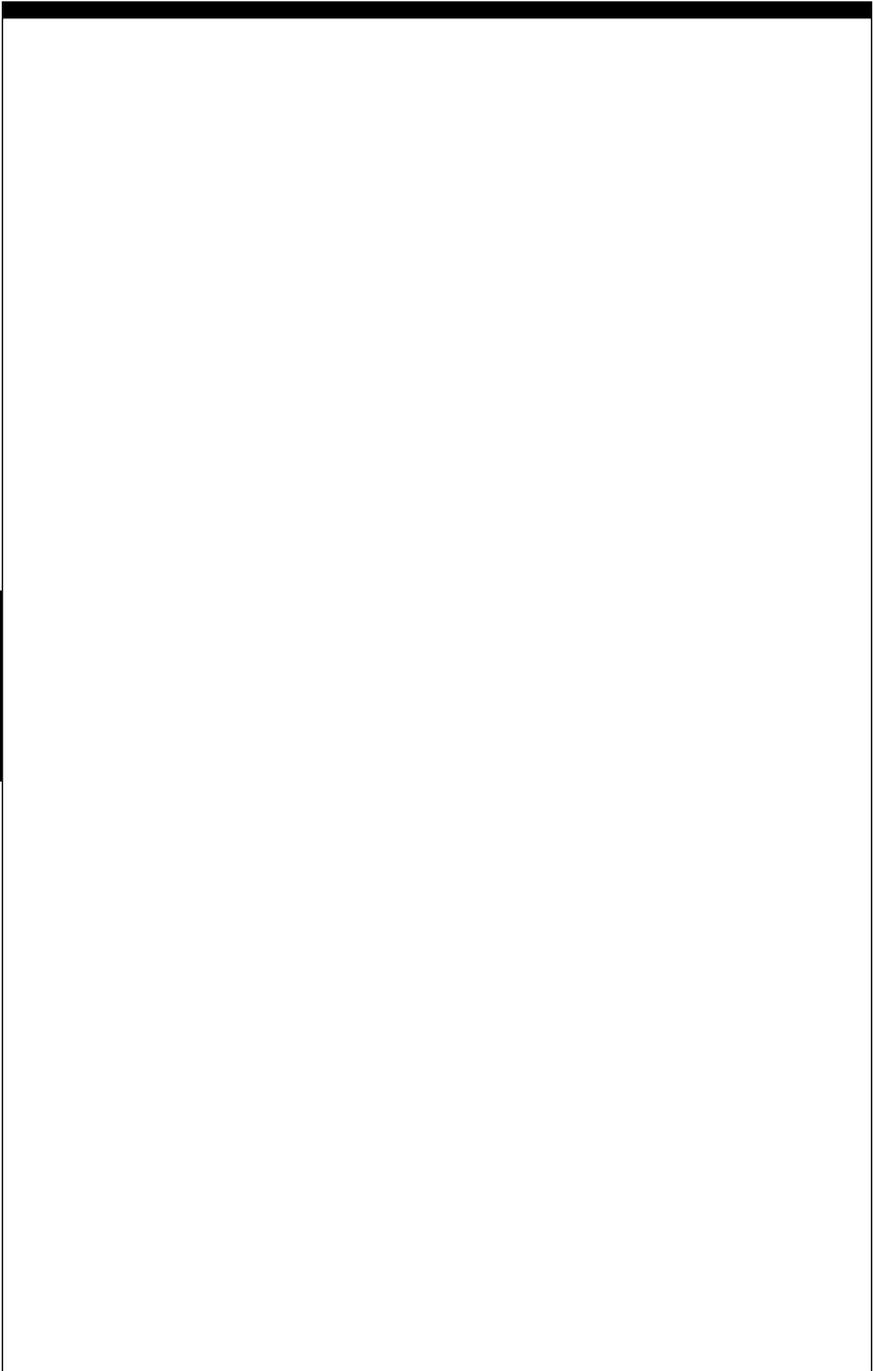
Training is required to be conducted on an annual basis and must include site-specific SPCC Plan training. The training must be documented and available for inspection.

The integrity testing results must be maintained with the facility's SPCC records. Copies of the facility SPCC plan must be retained at the facility if it is staffed at least four hours per day. For facilities staffed less than four hours, the SPCC plan may be retained at the nearest field office.

***Review and Recertification of the SPCC Plan***

- The SPCC plan must be amended and recertified by a PE any time a material change occurs that impacts the plan. Administrative revisions do not require recertification of the plan.
- The SPCC plan must be reviewed annually to verify availability and condition of spill response equipment.
- The SPCC plan must be reviewed every five years for any changes that could materially affect the facility's potential to discharge oil in harmful quantities to waters of the U.S.
- For qualified facilities, the Environmental Department may follow applicable SPCC regulation self-certification requirements. For example, if no substantial changes have occurred, no PE certification would be required.
- The five year review must be documented and filed with the SPCC records.





## Underground Storage Tanks (USTs)

### **What is an Underground Storage Tank?**

1. A vessel that meets all of the following requirements is an underground storage tank (UST):
  - A stationary device designed to hold petroleum and other regulated substances, (aviation gas, diesel fuel, gasoline, jet fuel, kerosene, and any grade of heating oil are some of the regulated substances);
  - Constructed of non-earthen materials, e.g., concrete, plastic, steel, etc.;
  - Ten percent or more beneath the ground, including any associated piping volume; and
  - Capacity of more than 110 gallons.
2. The following kinds of underground vessels are exempt or excluded from UST regulations:
  - Any underground tank that is hard piped to the natural gas pipeline system regulated by the Natural Gas Pipeline Safety Act (for example, low or high pressure discharge tanks from scrubbers, engines or other pipeline activity), in some cases tank monitoring may be required. Contact the Environmental Department.
  - Tanks holding heating oil used for consumption on the premises;
  - Septic tanks;
  - Stormwater or wastewater collection system tanks and components;
  - Flow-through process tanks;
  - Hazardous waste storage tanks; or
  - Tanks that are part of an emergency spill protection or overflow device (must be emptied immediately following use).
3. If the tank is a regulated UST, it must be registered and operated in accordance with regulations. If you are uncertain whether or not a tank is a regulated UST, contact the Environmental Department.
4. The Environmental Department will prepare all UST registrations.
5. Annual renewal fees are required for registered USTs. Facility Management will submit annual renewal fees and send a copy of the renewal to the Environmental Department.
6. An underground storage tank with a capacity in excess of 42,000 gallons may require a Spill Prevention, Control, and Countermeasure Plan.

### **Leak Detection Methods**

1. Regulated USTs must be monitored for leaks at least every 30 days.
2. Underground pressurized piping must be protected from leaks by an automatic

line leak detector, an annual line tightness test, or monthly monitoring by vapor, groundwater, or interstitial monitoring.

3. Underground suction piping must be protected from leaks by one of the following methods:
  - A line tightness test every three years that can detect a 1 gallon/hr leak rate at 1.5 times the operating pressure; or
  - Monthly monitoring by vapor, groundwater, or interstitial monitoring.
4. Contact the Environmental Department immediately if monitoring of any UST indicates a possible leak. Field personnel should not contact any regulatory agencies.

**Recordkeeping Requirements**

Maintain the following records on site or at an approved location for the life of the UST:

- Annual registration;
- Written performance claims on the release detection system, and the manner in which the manufacturer or installer tested the claims;
- Tank testing results;
- Results of all sampling, testing and monitoring, including inventory control and tank gauging;
- Calibration, maintenance, and repair records for the leak detection system.

**UST Removal**

1. Contact the Environmental Department immediately if a UST will be removed. The Environmental Department will be responsible for the coordination and oversight of the UST removal.
2. Keep all documentation for all the removal activities and all communications made before, during and after the removal of the UST(s) in station files.

**For Further Information**

Refer to the following Procedures in this Handbook:

- Communication with Regulatory Agencies
- Hazardous Waste Management
- Non-Hazardous Waste Management
- SPCC Plans
- Spill and Release Control, Cleanup and Reporting

Notes:

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## Index to Common Wastes

Refer to the following table to determine which waste procedures may apply to your waste. Contact the Environmental Department if you are unsure which procedure should be followed.

If the Waste is...	Refer to this Procedure...	Notes and Warnings
Abrasive Blasting Waste	Sandblasting Media	May contain lead or other metals.
Aerosol Cans	Empty Containers General Trash	Do not puncture unless using a device specifically designed for this purpose.
Appliances	Scrap Metal	Remove all refrigerants, capacitors, and transformers before disposal.
Asbestos/Asbestos-Containing Material	Asbestos	ACM handling and disposal are highly regulated activities.
Batteries	Batteries Chemical Inventory and SARA Reporting General Trash	If unsure of type, handle like a rechargeable battery.
Bloodborne Pathogens	Refer to Safety & Health Handbook	Contact the local Health Department or hospital for proper disposal.
Brine Water	Exploration and Production Wastes	May contain oil or condensate.
Capacitors	Non-Hazardous Waste PCBs	May contain PCBs.
Cements and drilling muds	Asbestos Hazardous Waste Non-Hazardous Waste NORM Exploration and Production Wastes	May contain asbestos and NORM.

## Index to Common Wastes

If the Waste is...	Refer to this Procedure...	Notes and Warnings
Circuit breakers	Non-Hazardous Waste PCBs	May contain PCBs.
Circuit boards	Computer and Electronic Equipment	May contain heavy metals.
Computers	Computer and Electronic Equipment	May contain heavy metals.
Concrete containing spills or leaks	Non-Hazardous Waste PCBs	May contain PCBs, oil, or other spilled substances.
Condensate	Chemical Inventory and SARA Reporting Oily Water PCBs Used Oil	May contain PCBs or oil.
Dielectric fluids	PCBs Used Oil	May contain PCBs or oil.
Drums	Empty Containers Product Storage	
Electric motors	PCBs Scrap Metal	May contain PCBs.
Empty containers	Empty Containers Scrap Metal	Empty the container and properly dispose of contents.
Equipment cleanout wastes: - scrubber liquids, sludge, turbine wash water	Hazardous Waste Non-Hazardous Waste NORM Oily Water PCBs Used Oil	May contain PCBs, oil, or condensate.
Filters (any kind)	Filters	Drain filter and properly dispose of drained fluids.
Fluorescent light ballasts	Light Bulbs Non-Hazardous Waste PCBs	May contain PCBs.

## Index to Common Wastes

If the Waste is...	Refer to this Procedure...	Notes and Warnings
Gaskets, Asbestos	Asbestos	See "Asbestos" above.
Glycol (ethylene, propylene and triethylene glycol)	Chemical Inventory and SARA Reporting Hazardous Waste Non-Hazardous Waste	Used glycol may be hazardous.
Hydraulic fluids	PCBs Used Oil	May contain PCBs, oil, or glycols.
Hydrostatic test water	Hazardous Waste Hydrostatic Test Water Non-Hazardous Waste Oily Water PCBs Used Oil	May contain PCBs, oil, or other contaminants.
Instrumentation	Computers and Electronic Equipment Mercury Non-Hazardous Waste PCBs	Depends on type of instrument.
Insulation: - block, batt, blanket, or vessel	Asbestos Non-Hazardous Waste	May contain asbestos.
Lead acetate tape (Rubicon tape)	Hazardous Waste Non Hazardous Waste	Check MSDS or sample.
Light Bulbs	General Trash Light Bulbs	
Manometers	Mercury	Most manometers contain mercury.
Metal: - empty containers, bindings, steel or iron scrap	Empty Containers General Trash Scrap Metal	Empty containers and properly dispose of contents.
Natural gas pipeline liquids	Chemical Inventory and SARA Reporting PCBs Used Oil	May contain PCBs, oil, or condensate.

<b>If the Waste is...</b>	<b>Refer to this Procedure...</b>	<b>Notes and Warnings</b>
NORM (Naturally Occurring Radioactive Materials)	NORM Exploration and Production Wastes	
Oil-based machining coolant and heat exchanger oils	PCBs SPCC Plans Used Oil	May contain PCBs, oil, or glycols.
Oily materials: - cardboard, pallets, rags, soil, sorbents	Hazardous Waste Non-Hazardous Waste PCBs Used Oil	
Oily wastewater	Hazardous Waste Oily Water PCBs SPCC Plans	May contain PCBs, oil, or condensate.
Painting waste: - paint cans, useable paint, rags, brushes, used paint thinner	Empty Containers Hazardous Waste Paint Removal Wastes Spent Solvents	Properly empty paint cans. Other painting wastes may be hazardous.
Paints and coatings	Asbestos Non-Hazardous Waste Paint Removal Wastes Sandblasting Media	May contain lead, other metals, or asbestos.
Paper or cardboard	General Trash Hazardous Waste Non-Hazardous Waste PCBs	
Pigs and Pigging Wastes	Hazardous Waste Non Hazardous Waste NORM PCBs Pigging Wastes Used Oil	May contain PCBs, oil, condensate, or NORM.
Pipe and pipe scale	NORM PCBs Scrap Metal Used Oil	May contain oil, PCBs, or NORM.

## Index to Common Wastes

If the Waste is...	Refer to this Procedure...	Notes and Warnings
Pipe coatings, insulation, lagging or wrap	Asbestos Non-Hazardous Waste Paint Removal Wastes Sandblasting Media Pipe Coating Wastes PCBs	May contain lead, PCBs or asbestos.
Pipeline liquids	Hazardous Waste PCBs Pigging Waste SPCC Plans Used Oil	May contain oil, condensate, or PCBs.
Pipeline valves	NORM PCBs Scrap Metal	May contain NORM or PCBs.
Produced water	NORM Oily Water Exploration and Production Wastes	May contain oil, condensate, or NORM.
Refrigerants	Air Permits Refrigerants	Service by licensed technicians.
Remediation Wastes	Hazardous Waste Non-Hazardous Waste PCBs Sampling and Analysis Waste Characterization	Test and prepare waste profile.
Rubicon tape (lead acetate tape)	Hazardous Waste Non-Hazardous Waste	Check MSDS or sample.
Sandblasting Wastes	Hazardous Waste Non-Hazardous Waste Paint Removal Wastes Sandblasting Media	May contain lead or other metals.
Scrubber liquids	Hazardous Waste Non-Hazardous Waste Oily Water PCBs SPCC Plans Used Oil	May contain PCBs, oil, or condensate.

**Index to Common Wastes**

<b>If the Waste is...</b>	<b>Refer to this Procedure...</b>	<b>Notes and Warnings</b>
Sludge/bottoms from tanks or separators	Hazardous Waste Non-Hazardous Waste NORM PCBs Used Oil	May contain PCBs, oil condensate, or NORM.
Soils containing spills or leaks	Hazardous Waste Non-Hazardous Waste PCBs	May contain PCBs, oil, or other spilled substances.
Spent solvents	Chemical Inventory and SARA Reporting Hazardous Waste PCBs Spent Solvents	May contain PCBs or oil.
Spill cleanup residues	Hazardous Waste Non-Hazardous Waste PCBs Sampling and Analysis Waste Characterization	
Switches	Mercury Non-Hazardous Waste PCBs Scrap Metal	May contain mercury or PCBs.
Transformers	Non-Hazardous Waste PCBs Scrap Metal Used Oil	May contain PCBs.
Turbine wash water	Hazardous Waste Non-Hazardous Waste Oily Water PCBs Used Oil	May contain PCBs, oil, or spent solvents.
Transite board	Asbestos Non-Hazardous Waste	May contain asbestos.
Unknown, not listed or "mystery" waste	Hazardous Waste Non-Hazardous Waste Sampling and Analysis Waste Characterization	

**Index to Common Wastes**

If the Waste is...	Refer to this Procedure...	Notes and Warnings
Used Oil	PCBs Spent Solvents SPCC Plans Used Oil	May contain PCBs and halogens.
Voltage regulators	Non-Hazardous Waste PCBs	May contain PCBs.
Waste water	Hazardous Waste Hydrostatic Test Water Non-Hazardous Waste Oily Water PCBs Process Water Discharge Spent Solvents	
Wood packing materials, pallets	General Trash	
X-ray film and associated chemicals	Hazardous Waste Sampling and Analysis Waste Characterization	

Notes:

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**WASTE**



## Asbestos

### What is Asbestos?

Asbestos is a mineral fiber used in many products where fire or heat resistance or general toughness is required. Asbestos is **not a RCRA hazardous waste**; it is considered a special waste with special management requirements. The management of asbestos-containing materials (ACM) is based upon the amount of asbestos and the condition of the asbestos-containing material (friability). If material contains 1 percent or greater of asbestos fibers, then it is considered ACM. ACM requires special storage, handling and disposal when it is "friable". Friable ACM is ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. If the material is, or can become, friable then it is a regulated asbestos-containing material (RACM). If the material is not, and is not expected to become friable, it is considered non-regulated asbestos-containing material (Non-RACM) even though it contains asbestos fibers.

Regulated asbestos-containing material (RACM) is:

- All friable ACM,
- Category I non-friable ACM (non-friable asbestos-containing packing, gasket, resilient floor covering or asphalt roofing products) that has become friable or that will be or has been subjected to sanding, grinding, cutting or abrading, or
- Category II non-friable ACM (any other type of non-friable ACM) that has a high probability of becoming friable or has been crumbled, pulverized or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

A release of friable asbestos in amounts of 1 pound or greater is a reportable quantity (RQ) and requires agency notification. Refer to the Spill procedure for agency notification.

The following table lists materials that may contain asbestos:

Surfacing Materials	Insulation	Miscellaneous
Materials sprayed or troweled on: <ul style="list-style-type: none"> <li>• walls,</li> <li>• ceilings,</li> <li>• structural members for:                             <ul style="list-style-type: none"> <li>- acoustical (e.g., spray-on)</li> <li>- decorative, or</li> <li>- fireproofing purposes</li> </ul> </li> </ul>	Transite board Pipeline coating Pipe lagging Pipe wrap Pipe insulation Vessel insulation Block, batt, and blanket insulation Cements and muds	Gaskets Ropes Floor tile Ceiling tile Roofing felt Concrete pipe Outdoor siding/fabrics Transite Window putty Boiler brick

- **Refer to the Pipe Coating procedure of the Handbook for instructions on management of asbestos-containing pipe coating.**

#### **For Regulated Asbestos-Containing Materials (RACM)**

1. ■ **Contact the Environmental and Safety Departments 30 days in advance of all demolition projects (whether asbestos is involved or not) and renovation projects (where asbestos is involved).**
2. Assume that these materials contain asbestos unless laboratory analysis or engineering/maintenance records positively indicate they don't.
3. Treat samples like actual asbestos by double sealing in plastic.
4. Do not touch or disturb frayed or damaged material suspected of containing asbestos. **Notify the Facility Management if you find possible asbestos-containing material that is frayed or damaged.** The Facility Management will then contact the Environmental and Safety Departments to coordinate control and removal activities. **Special training is required to handle this material.**

#### **Storage of RACM**

Store asbestos in accordance with the following minimum requirements:

1. Store in double six-mil thick plastic bags or multiple bags with a cumulative thickness of twelve-mil, or a six-mil plastic bag inside a DOT-approved drum (either a UN1A2 steel removable-top drum or a UN1H2 plastic removable-top drum).
2. For materials that will not fit into bags or drums (e.g., transite panels), seal materials in at least double six-mil thick plastic or plastic lined roll off container.
3. If you are in one of the following States, additional requirements apply:
  - In **Louisiana**, clear bags must be used if the waste is transported in bags.
  - In **Pennsylvania**, use multiple plastic bags with a cumulative thickness of 12 mils (or more) or multiple plastic bags with a cumulative thickness of six mils (or more) sealed in steel or heavy-duty fiberboard drums.
4. When placing asbestos into waste containers, do the following:
  - Make sure that any friable asbestos is thoroughly wet before closing the container for the final time;
  - Gloves and other solids can be added before sealing;
  - Seal all containers by securing the drum lids or by sealing the neck of plastic bags with duct tape;
  - Store the containers at a secure Company location;
  - For accumulation containers, each item must be individually wrapped/sealed and placed in drum.

## Asbestos

- Mark or label the container per DOT Compliance guidance and OSHA guidance.
  - Label containers or sealed materials with the name of the waste generator and the location at which the waste was generated.
5. Dispose of asbestos-containing material in a timely manner.

### **Shipping of RACM**

1. Ship asbestos waste to a Company-approved disposal facility. Contact DOT Compliance Services for proper labels and shipping papers, and the Environmental Department for approved disposal facilities.
2. When preparing sections of pipe coated with asbestos-containing material that is friable for transportation to a Company-approved disposal facility:
  - Pipe joints must be less than 40 feet long for transportation by trailer (also verify whether or not a specific pipe length is required by the disposal company);
  - Pipe joints must be less than 20 feet long for transportation in a roll-off container;
  - Seal ends of pipe with plastic sheeting and duct tape or place in a sealed roll-off container;
  - A manifest is required for transportation to a disposal facility;
  - Provide State environmental or health department registration, if applicable.
3. Use either Company vehicles or contract vehicles that meet DOT requirements to transport asbestos waste. If the amount of asbestos-containing material being transported is 1,000 pounds or more, a commercial driver's license with hazardous materials endorsement is required.
4. Ensure that the vehicle transporting regulated asbestos-containing material (RACM), i.e., friable, waste from the facility is marked with signs warning of asbestos danger while the vehicle is being loaded and unloaded. The sign shall read as follows:

**DANGER**  
**ASBESTOS DUST HAZARD**  
**CANCER AND LUNG DISEASE HAZARD**  
**Authorized Personnel Only**

5. Inspect all containers before and after unloading/loading to verify that:
- All drums tops are secured.

- Duct tape has been placed around the necks of all bags and there are no punctures to the bags. Place additional bags over the outside of any punctured bags and secure the necks of the new bags with duct tape.
  - All containers are properly labeled.
6. The type of shipping papers required depends on the State. A waste shipping record must be completed for each shipment. In the following States, additional requirements apply:
- In **Kentucky, Louisiana, and Ohio**, an Asbestos Waste Shipment Record and DOT Shipping Papers must accompany each load.
  - In **New York and Pennsylvania**, DOT Shipping Papers are required.
  - In **Texas**, a State Waste Manifest is required.
  - In **Rhode Island**, disposal of asbestos waste is prohibited. Follow the shipping paper requirements of the destination State.
7. Make sure shipping papers are completed as follows:
- Check the "RQ" (reportable quantity) column on the shipping paper or mark "RQ" before the shipping name if the shipment contains one pound or more of friable asbestos;
  - DOT shipping name is "Waste Asbestos" or, if the asbestos waste is mixed with a binder, filler, or other material, "Waste Asbestos Mixture";
  - Hazard class identification number, "Class 9";
  - North American identification number, "NA2212";
  - Packing group, "PG III".
8. Make sure the shipping papers include the following:
- Name, address, and telephone number of waste generator.
  - Name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
  - Approximate quantity of waste in cubic yards.
  - Name and telephone number of the disposal site operator.
  - Name and physical site location of the disposal site.
  - The date transported.
  - Name, address, and telephone number of the transporter.
  - Certification that the contents are classified, packed, marked and labeled for transport by highway according to applicable DOT regulations.
9. The waste shipment record must be returned to the generating facility or designated location from the disposal facility within 35 days of shipment. Contact the disposal facility and the Environmental Department if this is not received within 35 days of shipment. A report must be filed with the agency responsible for asbestos within 45 days of the original shipment date if the situation is not resolved.

### ***Disposal of RACM***

1. Never dispose of asbestos-containing waste by placing it in a container with other trash, by burying, using as fill material, or leaving it in a pipe excavation ditch.
2. Dispose of asbestos-containing waste as soon as practical at a disposal facility that is permitted to accept asbestos. Contact the Environmental Department for approved disposal sites for asbestos-containing waste.

### ***For Non-Regulated Asbestos-Containing Materials (Non-RACM)***

When working with Non-RACM, consult the Safety Department for training requirements.

### ***Storage of Non-RACM***

Store the Non-RACM material at a secure Company facility and in a manner that prevents the material from becoming friable. Store the Non-RACM in plastic bags (use double six-mil plastic bags for pipe coating) or seal in plastic prior to shipment. Mark or label the material with a non-hazardous or special waste label that identifies the material as Non-Friable. Dispose of material in a timely manner.

### ***Shipping of Non-RACM***

1. Ship Non-RACM waste to a Company-approved disposal facility.
2. Special waste shipping papers are not needed to transport Non-RACM wastes. A bill of lading should be used to identify the wastes as Non-RACM and the approximate amount of material being transported.
3. Pipe coated with non-friable asbestos can be sold and transported to a scrap dealer or individual buyer for recycling. Written notification to the dealer or buyer must include a Bill of Sale/Purchase Agreement, provided by Supply Chain Management, which indicates that the pipe is coated with a non-regulated asbestos-containing material. Contact the Environmental Department for details on transferring pipe coated with non-friable asbestos.
4. Inspect all containers before and after unloading/loading to verify that:
  - All drums tops are secured.
  - Duct tape has been placed around the necks of all bags and there are no punctures to the bags. Place additional bags over the outside of any punctured bags and secure the necks of the new bags with duct tape.

### ***Disposal of Non-RACM***

Dispose of Non-RACM waste as soon as practical at a disposal facility that is permitted to accept the material. Contact the Environmental Department for approved disposal sites.

**Historical Asbestos Disposal Sites**

- **Current disposal of asbestos-containing material onsite is prohibited.**
- **Notify Environmental Department of any historical disposal sites that are not currently identified.**

Existing on-site asbestos disposal sites shall have warning signs and fencing. A sign shall be placed along each side of a rectangular area near the middle of each side. The signs shall be at intervals of at least every 328 feet along each side of a rectangular area.

The warning signs shall be posted in such a manner and location that a person can easily read the legend and conform to the requirement for 20 inch by 14 inch upright format signs as specified in 20 CFR 1910.145(d)(4). The signs shall state:

**CAUTION**  
**ASBESTOS WASTE DISPOSAL SITE**  
**DO NOT CREATE DUST**  
**BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH**

All signs shall be furnished with rounded or blunt corners and shall be free from sharp edges, burrs, splinters, or other sharp projections. The ends or heads of bolts or other fastening devices shall be located in such a way that they do not constitute a hazard. The top portion of the sign shall have the word "Caution" in yellow letters with black background. The rest of the sign shall have yellow background with black letters.

**For Further Information:**

Refer to the following procedures in this Handbook:

- Labeling
- Non-Hazardous Waste Management
- Pipe Coating
- Sampling and Analysis
- Transfer of Property or Equipment

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## Batteries

### Types of Batteries

Batteries come in a variety of shapes and sizes. Classification is necessary for proper storage and disposal. Batteries are divided into the following categories:

- Alkaline batteries (non-rechargeable, dry-cell batteries such as Eveready™ and Duracell™ batteries, this category also includes carbon-zinc batteries);
- Rechargeable batteries (this category includes lithium, magnesium, mercury, and nickel-cadmium [ni-cad] batteries);
- Button (disc-shaped) batteries commonly found in watches and calculators; and
- Lead-acid batteries (wet cell batteries used in cars and trucks, also includes back-up power supply batteries and sealed AGM or Gel batteries).

Use labels and/or material safety data sheets (MSDSs) to assist in determining the classification of a particular battery. If it is impossible to be certain about the classification, assume that a battery is a rechargeable battery.

Batteries contain irritating, corrosive or hazardous materials. In States that have adopted the Universal Waste rules, recycle batteries under the Universal Waste rule. Universal Waste rules were implemented to ease the regulatory burden of disposal for some used products including batteries. Additionally, these rules are an incentive to recycle these batteries rather than dispose of them. With the exception of alkaline batteries, batteries that are not recycled must be handled as hazardous waste.

In **California**, batteries are subject to special handling requirements.

### Storage

1. Do not store spent alkaline batteries; dispose of them immediately as general trash.
2. To the extent possible, avoid treating rechargeable batteries as hazardous waste by recycling them as Universal Waste. To manage as Universal Waste, store rechargeable batteries as follows:
  - Store in a plastic container with a removable lid.
  - Keep the container closed at all times.
  - Label the container with the words, "USED BATTERIES" and Accumulation Start Date.
  - For Accumulation Start Date, use one of the following:
    - the earliest date that any battery was placed in the container.
    - mark or label each individual battery with the date it first became a waste.
    - if the Accumulation Start Date is not noted on the container, maintain an inventory system on-site that identifies the date each battery became a waste.

- Send the container to a recycler within one year of the storage date. When managed under the Universal Waste regulations, these batteries should not be counted in determining the facility generator status.
  - If rechargeable batteries are not handled as Universal Waste, they must be handled as hazardous waste.
3. Button batteries destined for recycling should be stored as Universal Waste as identified above. Button batteries that are not recycled must be managed according to the Hazardous Waste procedure. CESQG facilities may dispose of button batteries as general trash.
  4. Trade in spent lead-acid batteries when purchasing replacements whenever possible. If trade-in is not feasible, store batteries as follows:
    - Store in an area protected from the weather (e.g., on a pallet in the container storage area).
    - Label each used lead-acid battery with the words, "Used Battery" and the Accumulation Start Date.
    - Secure all caps on the battery. If a cap is missing, plug the cell by some means to prevent spillage.
    - Store leaking or damaged lead-acid batteries in a non-leaking container in the container storage area.
    - Label containers holding leaking or damaged batteries with the words, "Used Batteries" and with Accumulation Start Date.
    - Store no more than a total of 5,000 kg (11,000 pounds) of Universal Waste (batteries, mercury-containing lamps, pesticides, and/or thermostats) at the facility at any time. If more than 5,000 kg are stored at any one time, State notification is required.
    - **! The weight of sulfuric acid contained in stored wet-cell batteries must be counted when determining the facility's SARA Tier II reporting status. (Refer to the Chemical Inventory and SARA Reporting procedure of this handbook for requirements.)**
    - Send the batteries to a recycler within one year of the storage date. Batteries sent to a recycler are subject to the Universal Waste regulations and should not be counted when determining the facility generator status. Batteries that are not recycled must be handled under the hazardous waste regulations.

### **Disposal**

1. Alkaline batteries can be disposed of with general trash.
2. Trade in lead acid batteries to the vendor when purchasing replacement batteries when possible.
3. Use Company-approved facilities to recycle used rechargeable batteries or button batteries and lead-acid batteries. Large chain auto shops, e.g., Auto Zone and Wal-Mart, are Company-approved facilities.

## Batteries

4. If used rechargeable batteries, button batteries, or lead-acid batteries are not recycled, they must be managed and disposed of as hazardous waste.

### **Shipping/Transportation**

1. There are no special shipping/transportation requirements for used alkaline batteries.
2. Transport used rechargeable or button batteries and lead-acid batteries in DOT-approved containers that are properly labeled and in good condition (free of corrosion or other damage).
3. Use only approved transporters to ship used rechargeable or button batteries and lead-acid batteries to recycling facilities. Self-transportation of batteries for recycling purposes is allowed.
4. Before loading, be sure that shipping containers:
  - Are in good condition and not leaking;
  - Have clean interiors (inspect, if possible);
  - Have secure hatches or covers; and
  - Are labeled as "used batteries" if managed as Universal Waste; or
  - Are properly marked, labeled and managed under the hazardous waste regulations.
5. Check DOT shipping papers (e.g., bill-of-lading, hazardous waste manifest) to be sure they are completed when shipping used batteries. Obtain receipts for used batteries delivered to reclaimers or traded in and file receipts in facility files for a minimum of 3 years. Contact the Environmental Department to determine retention after that period.
6. Contact the Environmental Department immediately if you are notified that a shipment of used batteries has been rejected by a recycling facility.

### **For Further Information**

Refer to the following procedures in this Handbook:

- Chemical Inventory and SARA Reporting
- Empty Containers
- Labeling
- Spill and Release Control, Cleanup and Reporting

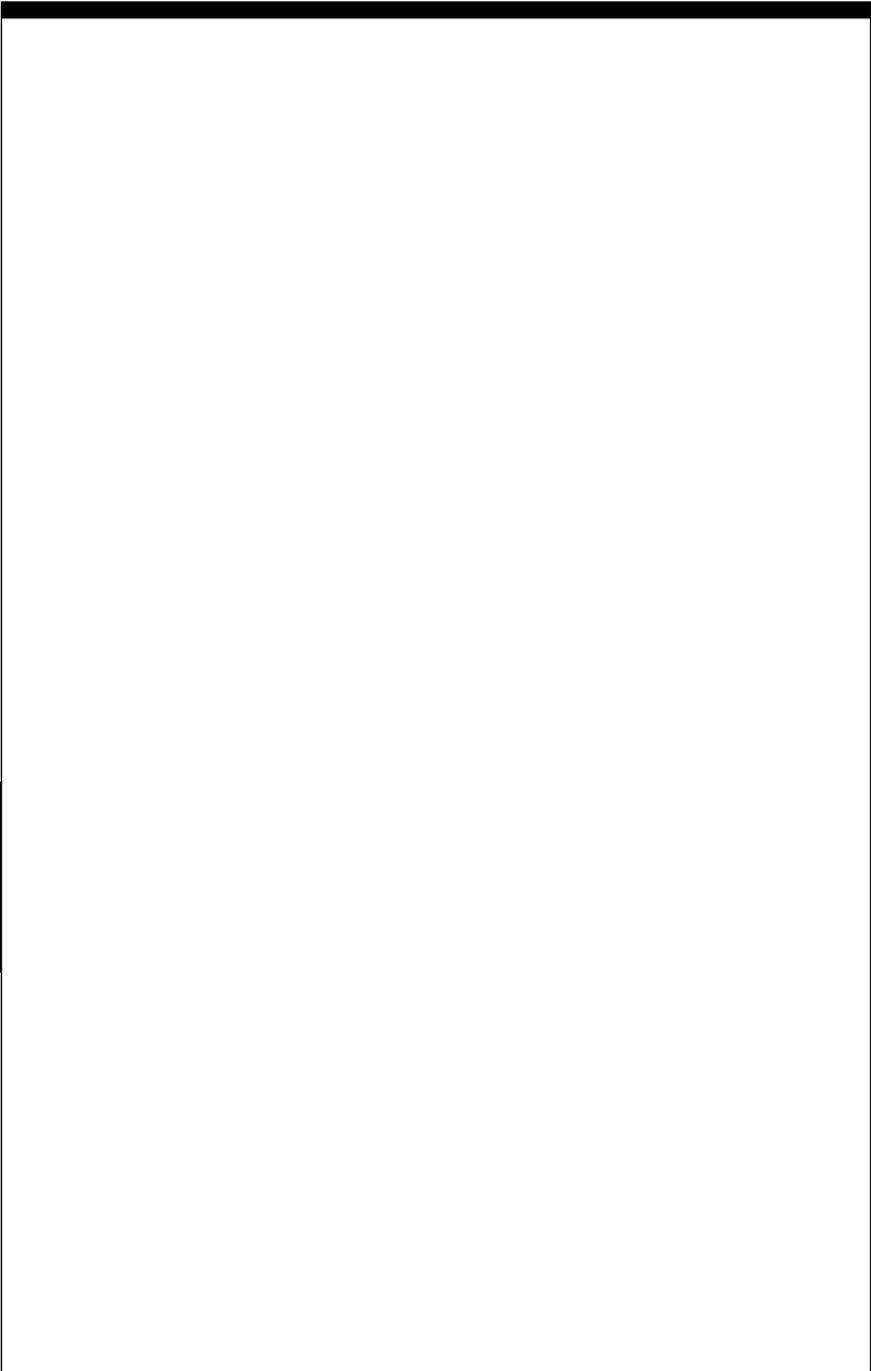
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## Computers and Other Electronic Equipment

### **About Computers and Other Electronic Equipment**

Computer equipment and other electronic equipment may be considered a hazardous waste upon disposal due to the presence of TCLP metals. Because testing to determine the hazard status is difficult, these guidelines are provided to assist in determining what options are available for outdated or broken computers and other electronic equipment.

In **California**, cathode ray tubes (CRTs) require special handling.

### **Storage**

1. Equipment that is still in working condition, can be repaired, or can be used for its original intended purpose, is not a waste. There are no special storage requirements.
2. Equipment sent to a legitimate refurbisher as a "still usable product" is not considered waste. There are no special storage requirements.
3. Equipment and/or components that cannot be used for the original intended purpose must be stored according to its hazardous characteristics. If hazardous waste characterization is not possible, store as a hazardous waste.

### **Disposal**

1. Maximize opportunities to reuse computer equipment rather than dispose of it.
  - Reuse internally
  - Give away or sell to charities or other users
2. Equipment sent to a legitimate refurbisher as a "still usable product" is not considered waste. The equipment does not have to be in perfect working condition to be considered a "still usable product". (However, a computer monitor with a broken glass would not be considered a usable product.) The refurbisher must be qualified to work on the equipment and is responsible for the disposition of the resulting material, for example, fully functioning computers or equipment, reusable parts, scrap metal, other non-hazardous scrap such as plastic, and any wastes generated. **Refurbishers must be approved by the Environmental Department.**
3. Manage disposal of computer and other electronic equipment so that **no more than 220 pounds of total hazardous waste will be generated** from a facility during any given calendar month. Please note that exceeding 220 pounds of total hazardous waste generated will change the generator status of the facility.
  - Phase out old computer systems over time to avoid excess disposal in any one month.
  - Check with the facility to see if they have already generated 220 pounds of hazardous waste that month.
    - If the total volume of hazardous waste at the facility is over 220 pounds the equipment would be handled, manifested and disposed as a hazardous waste.

- If the total volume of hazardous waste generated is less than 220 pounds, the equipment may be disposed at a Subtitle D landfill (e.g., municipal waste landfill) or recycled. **Contact the Environmental Department for specific State requirements.**

Approximate weights of assembled CRT computer monitors:

14"	15 - 25 lbs
15"	20 - 30 lbs
17"	40 - 50 lbs
19"	60 - 75 lbs
21"	80 - 90 lbs

Actual weights vary by age of equipment and manufacturer.

4. Where sampling and testing are practical, a laboratory TCLP metals analysis could determine that the equipment is not a hazardous waste. If it is determined not to be a hazardous waste, then disposal at a Subtitle D landfill (e.g., municipal landfill) may be possible.

**For Further Information**

Refer to the following procedures in this Handbook:

- Hazardous Waste Management
- Labeling
- Non-Hazardous Waste Management
- Sampling and Analysis
- Waste Characterization

Notes:

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## Empty Containers

### What is an Empty Container?

For storage and disposal purposes, an empty container is a container that has been emptied of all free-flowing materials by pumping, pouring or spraying (aerosol cans), and meets the following conditions:

- If container's capacity is **110 gallons or less**, then residue on bottom of container must be 1 inch deep or less; or 3% or less of the container's total capacity.
- If container's capacity is more than **110 gallons**, then residue on bottom of container must be 0.3% or less of the container's total capacity.
- If container is a gas cylinder or an aerosol can it must be emptied or drained to atmospheric pressure. Do not puncture aerosol cans unless using a device specifically designed for that purpose.

Examples of common types of empty containers include:

- Paint cans
- Product storage containers
- Waste containers
- Oil containers

**! Do not pour contents on ground or into a sump or drain.**

In **California**, empty containers have special handling requirements.

### Storage

1. If a container does not meet the above definitions, it must be emptied before it is stored or disposed. Collect all material emptied from the container and store with similar material so that it can be reused. If material can't be reused, it must be treated as waste.
  - If container held paint not mixed with any other solvents, then dry out remaining paint and dispose of container as facility trash.
  - If a container held polychlorinated biphenyls (PCBs), asbestos, naturally-occurring radioactive materials (NORM), mercury contaminated waste, or is suspected of having contained a hazardous waste, then contact the Environmental Department before emptying.
  - If the container does not qualify as "empty" using this procedure, then contact the Environmental Department for instructions.
2. Store empty containers as follows:
  - If an empty container has a capacity of five gallons or less, it may be crushed and placed in a general trash bin or container.
  - Be sure that empty containers are clearly marked with the word "Empty", are kept closed at all times, and maintained in good, usable condition. Empty containers may be stored in a designated empty container storage

area in lieu of marking the individual container.

- For outside storage of drums:
    - store empty drums on their side, off the ground, and in a manner to prevent the collection of rainwater.
    - if empty drums are not stored on their side or protected from the weather, keep off the ground and use a drum lid cover, plywood or tarp to prevent accumulation of rainwater on top of closed lids. If the lids are left off, drums or containers may fill up with rainwater, which will become a liquid waste requiring proper disposal.
    - store on wood pallets or on a rack in such a manner as to prevent corrosion and/or the collection of rainwater on the container.
3. Store and label new unused containers in the same manner as emptied containers.

**Disposal**

1. Dispose of empty containers with capacities of five gallons or less with general trash. Containers may be crushed to minimize volume, but do not puncture aerosol cans, unless using a device specifically designed for that purpose.
2. If an empty container has a capacity of more than five gallons, return to the original supplier.
3. Containers in poor condition or that cannot be returned to the original supplier, must promptly be sent to an approved recycler. Contact the Environmental Department for names of approved container recyclers.
4. Empty pesticide containers must be triple rinsed before disposal of the container. Rinsate can be used in the same manner as the pesticide to avoid creating a waste.

**Shipping**

Shipping papers, e.g., invoice or shipping ticket, are required on empty containers that are returned to suppliers or container recyclers.

**For Further Information**

Refer to the following procedures in this Handbook:

- Hazardous Waste Management
- Labeling

Notes:

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## Exploration and Production Wastes

### **What are Exploration and Production (E & P) Wastes?**

E & P wastes are wastes derived from primary field operations associated with the exploration, development and production of natural gas occurring at or near the wellhead but before the point where the gas is transferred to a carrier for transport to market. Within the El Paso Pipeline Group, this includes certain waste streams associated with underground storage, offshore and on shore production. Some wastes generated from these activities are exempt from the Hazardous Waste regulations, although it is important to remember that all E & P wastes require proper handling and disposal.

### **What wastes are exempt?**

#### **Not all wastes generated at E & P sites are necessarily exempt from the Hazardous Waste regulations.**

To be considered an exempt waste, the waste must have been generated from a material or process uniquely associated with the exploration, development, and production of natural gas. For example, a solvent used to clean surface equipment or machinery is not exempt because it is not uniquely associated with exploration, development, or production operations. Conversely, if the same solvent were used in a production well, it would be exempt.

If the answer to either of the following questions is yes, an E & P waste is likely considered exempt from the Hazardous Waste regulations:

- Has the waste come from down-hole, i.e., has it been brought to the surface during oil and gas E & P operations?
- Has the waste otherwise been generated by contact with the oil and gas production stream during the removal of produced water or other contaminants from the product?

### **Examples of Exempt E & P Wastes:**

- Produced water
- Rigwash
- Drilling Fluids and cuttings from offshore operations disposed of onshore
- Well completion, treatment and stimulation fluids
- Accumulated materials such as hydrocarbons, solids, sands and emulsion from separators, fluid treating vessels and production impoundments.
- Drilling Fluids
- Produced sand
- Basic sediment, water and other tank bottoms from storage facilities that hold product and exempt waste
- Hydrostatic discharges and pigging wastes in offshore areas
- Gas plant sweetening wastes for sulfur removal, including amines, amine filter, amine filter media, backwash, precipitated amine sludge, iron sponge and hydrogen sulfide scrubber liquid and sludge

- Wastes from subsurface gas storage and retrieval, except for the non-exempt wastes listed below
- Workover wastes
- Pit sludges and contaminated bottoms from storage or disposal of exempt wastes
- Packing fluids
- Liquid hydrocarbons removed from the production stream, but not from oil refining
- Pigging wastes from gathering lines/offshore lines
- Gas plant dehydration wastes, including glycol-based compounds, glycol filters and filter media, back wash and molecular sieves
- Cooling tower blowdown
- Pipe scale, hydrocarbon solids, hydrates and other deposits removed from piping prior to transportation
- Hydrocarbon-bearing soil
- Constituents removed from produced water before it is injected or otherwise disposed

**Examples of Non-Exempt E & P Wastes:**

- Unused fracturing fluids or acids
- Gas Plant cooling tower cleaning wastes
- Painting wastes
- Waste solvents
- Waste in transportation pipeline related pits
- Boiler cleaning wastes
- Laboratory waste
- Pesticide wastes
- Oil and gas service company wastes such as empty drums, drum rinsate, sandblast media, painting wastes, spent solvents, spilled chemicals and waste acids
- Used equipment lubricating oils
- Waste compressor oil, filters and blowdown
- Used hydraulic fluids
- Caustic and acid cleaners
- Boiler scrubber fluids, sludges and ash
- Boiler refractory bricks
- Sanitary wastes
- Radioactive tracer wastes
- Vacuum truck and drum rinsate from trucks transporting or containing non-exempt wastes

A determination must be made as to whether a specific non-exempt waste is actually a hazardous waste. The method of this determination is discussed in the Waste Characterization procedure of this handbook. Consult with the Environmental Department for guidance on specific handling and disposal requirements.





## Filters

### Types of Filters

For handling and disposal purposes, used filters are classified as shown in the table below.

Classification	Examples
Used oil filters	engine crankcase filters
Non-hazardous used filters (by TCLP analysis or generator knowledge)	any drained or dry used filter (except used oil filters), scrubber filter, air filter, separator sock filter, natural gas filter, produced salt water filter, glycol filter
Hazardous used filters	any undrained used filter, any used filter with hazardous TCLP result or generator knowledge, scrubber filter

**Any filter that has come in contact with the gas stream may require TCLP testing to determine whether it is hazardous or non-hazardous. Contact the Environmental Department to determine the frequency of this testing.**

**Used filters that have come in contact with the gas stream (e.g., scrubber filters) may ignite upon removal from the vessel, creating pyrophoric iron fires.** Avoid fires by using an approved method of safely removing the filters (contact Safety Department). A common method is to soak the filters with water to prevent a fire. Regardless of the method used, handle all wastes properly. See the Waste Characterization procedure for more information.

### Storage

**Never drain a used filter onto the ground.**

1. Unless the oil filters and residual oil are being recycled, filters shall be gravity hot drained before storage.
  - Puncture the filter anti-drain back valve or the filter dome end with a proper tool, in a safe manner or dismantle the filter.
  - Hot drain the filter (gasket side down) at a temperature of at least 60°F for a minimum of 12 hours. Do not allow oil filters to sit and drain into an open drum.
  - Collect drained fluids and handle appropriately (e.g., handle drained oil as used oil).
  - If the filter is not hot drained, it may be a hazardous waste. Testing is then required.

## 2. Store used drained filters as follows:

- In a DOT-approved container in the non-hazardous waste storage area or recycling oil filter dumpster or dispose of in a trash dumpster, if allowed by the State;
- Label the drum or recycle dumpster with a non-hazardous waste label and the words, "Used Oil Filters".

In **Rhode Island**, on-site storage of used oil filters may not exceed 90 days without a permit.

In **Texas**:

- Store used oil filters in sealed containers, such as drums with ring closure lids.
  - Store no more than three, 55-gallon drums of used oil filters at the facility at any time.
  - Label used oil filter containers with the words "Used Oil Filters" in letters at least four inches high.
3. Store used filters, other than oil filters, according to their waste characteristic.
- If the filter is non-hazardous, store as follows:
    - In a DOT-approved container in the non-hazardous waste storage area or dispose of in a trash dumpster, with State approval;
    - Label the drum with a non-hazardous waste label.
  - If the filter is hazardous, store as follows:
    - In a DOT-approved container in the hazardous waste storage area or satellite accumulation area;
    - Label the drum with a completed hazardous waste label;
    - Follow all other requirements that apply to hazardous waste.

**Shipping**

1. Complete the following paperwork before shipping used filters:
  - Used oil filters—DOT shipping papers (bill of lading), unless shipped with facility general trash.
  - Non-hazardous used filters—bill of lading, unless shipped with facility trash.
  - Hazardous used filters—hazardous waste manifest.
2. Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.

**Disposal**

Dispose of used filters as follows:

- Used oil filters—at an off-site recycling facility or municipal waste disposal facility that has been approved by the Environmental Department.





## General Trash

### **What is General Trash?**

General trash is garbage, domestic waste, refuse or material that is not a hazardous waste and can be disposed of at a municipal or regional landfill by a general trash hauler.

Examples of general trash are:

- office paper
- uncontaminated cardboard
- wood packing materials
- food and cafeteria wastes
- rope or twine
- uncontaminated wood, rubber, or cloth
- food packaging
- aluminum foil and cans
- glass
- steel or iron scrap, if non-hazardous
- metal bindings
- plastics or Styrofoam

To the extent possible, recycle materials with available recycling facilities.

### **Storage**

**! Do not mix any of the following wastes with general facility trash:**

- Hazardous waste of any kind.
- Empty containers, unless they have been emptied in accordance with the Empty Containers procedure.
- Used oil absorbent rags or mats soaked with oil, or oil-contaminated soil, unless authorized by disposal company.
- Asbestos, lead, mercury, or PCB-containing waste.
- Batteries other than dry cell batteries.
- Non-incandescent light bulbs. Facilities that are Conditionally Exempt Small Quantity Generators (CESQG) can store non-incandescent hazardous bulbs until the end of the month. If the additional weight does not change their CESQG status, the bulbs may be put into general trash.
- Liquids of any type.

Store general trash in appropriate containers or bins provided by the disposal company. Avoid accumulation of general trash in "bone yards". Review disposal company guidelines prior to depositing in receptacle.

**New York** requires low mercury (sometimes referred to as "green-tip") lamps to be managed as Universal Waste.

### **Special Requirement for CESQG Waste**

Facilities that are conditionally exempt small quantity generators (CESQG) can store non-incandescent hazardous fluorescent light bulbs and button batteries until the

end of the month. If the additional weight does not change their CESQG status, the bulbs and/or batteries may be put into general trash.

In **Arizona** and **California**, CESQG facilities must dispose of hazardous fluorescent light bulbs as Universal Waste. They may not be put in with general trash.

In **California** there are special handling requirements for button batteries.

**Disposal**

1. Do not dispose of any general trash by burning, dumping or burying on or off-site.
2. Dispose of general trash in dumpsters or other containers provided by Company-approved municipal or regional waste disposal companies.
3. Disposal companies may restrict what may be placed in their receptacles.

**Shipping**

A general trash hauler can transport general trash to a municipal landfill for disposal. No manifest or shipping papers are required for shipments of general trash.

**For Further Information**

Refer to the following procedures in this Handbook:

- Batteries
- Empty Containers
- Hazardous Waste Management
- Labeling
- Light Bulbs
- Non-Hazardous Waste Management

Notes:

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## Hazardous Waste Management

### **What is Hazardous Waste?**

Hazardous waste is waste that has been found to be hazardous through testing or by generator knowledge. Waste is hazardous because it:

- Exhibits a characteristic that makes it hazardous (corrosivity, ignitability, reactivity, toxicity); otherwise known as a characteristic hazardous waste.
- Results from a process that has been determined to produce hazardous waste; otherwise known as a listed hazardous waste.
- Consists of spent or off-specification products that are specifically listed as hazardous; otherwise known as a listed hazardous waste.

**! If uncertain if waste is hazardous, follow all procedures for handling hazardous waste and contact the Environmental Department for further assistance in identifying the waste.**

1. A waste profile is a resource in identifying hazardous waste. If a waste profile has not already been completed for a waste, contact the Environmental Department.
2. Contact the Environmental Department if you believe that a waste profile is out of date or is inaccurate in any way.

**! Generation of hazardous wastes in certain volumes and storage for certain time periods may trigger regulatory enforcement action. Before generating and storing any hazardous waste, contact the Environmental Department to receive detailed instructions.**

### **Generator Status**

Storage, disposal and shipping procedures for hazardous wastes vary depending on the "generator status" of the facility. The status may be:

- Large Quantity Generator (LQG) – generates equal to or more than 2,200 pounds of hazardous waste in a calendar month, or stores more than 13,200 pounds of hazardous waste at any time;
- Small Quantity Generator (SQG) – generates more than 220 and less than 2,200 pounds of hazardous waste in a calendar month, or stores up to 13,200 pounds of hazardous waste at any time;
- Conditionally-Exempt Small Quantity Generator (CESQG) – generates 220 pounds or less of hazardous waste in a calendar month, or stores less than 2,200 pounds of hazardous waste at any time.

**! With Environmental Department approval, hazardous wastes generated off-site in amounts of 220 pounds or less per calendar month may be transported to a Company facility for consolidation. An EPA Transporter ID Number is not required.**

**Weight Determination**

- In determining the weight of the waste, subtract the weight of the empty container.
- Use portable scales or weigh a gallon of the waste and multiply that weight by the total volume.

**Storage Time Frames**

Hazardous waste can be stored for periods that are based on the generator status. Do not store hazardous waste for periods longer than shown here:

- Large Quantity Generator- 90 days
- Small Quantity Generator- 180 days (270 days if the waste must be transported more than 200 miles for disposal)
- Conditionally-Exempt Small Quantity Generator- no regulatory limit, but it is recommended that full containers be disposed of as soon as practical.

**! The storage time begins when the waste is first generated, not when the analysis is received.**

**Storage**

The following procedures apply to storage of hazardous waste for **all classes of generators**:

1. Store hazardous wastes using DOT-approved containers, a frac tank (bulk liquid wastes), a covered steel roll-off container with a poly-liner (bulk solid wastes like contaminated soil), or on a thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes);
2. When using DOT-approved containers, be sure the containers are kept closed or sealed (except when waste is being added), maintained in good condition (not corroded, damaged, or leaking) and store compatible substances that will not react with the hazardous waste. For example, store acidic wastes in plastic or plastic-lined containers rather than steel containers. The appropriate approved DOT shipping container is specific to the waste that will be placed in the container. In order to determine which types of containers (packaging) may be used to ship a specific hazardous waste, consult with the applicable hazardous waste disposal facility or contact the Environmental Department. Some typical DOT-approved drum types are as follows:
  - UN 1A1 – Steel drum with non-removable lid, typically used for non-corrosive liquids.
  - UN 1A2 – Steel drum with removable lid, typically used for non-corrosive liquids, semi-solids or solids.
  - UN 1H1 – Plastic drum with non-removable lid, typically used for corrosive liquids.
3. Label hazardous waste containers (drums, roll-off containers, tanks) as soon as any hazardous waste is placed into the container. The commercially-available

## Hazardous Waste Management

yellow and red hazardous waste labels may be used. Use a waterproof pen to complete information on the label. The label must be weather-resistant and **shall** include:

- The words "Hazardous Waste";
  - Description of waste (contact the Environmental Department to obtain a waste description);
  - Accumulation start date (the date the waste was added to the container, if not from satellite storage, or the date it was brought to the waste storage area from a satellite accumulation area).
4. Label waste piles with a weatherproof sign with the words "Hazardous Waste", a description of the waste, and the date the waste pile was started. Cover waste piles to protect them from weather and surround with barricade tape.
  5. Store hazardous waste in a designated hazardous waste storage area (or in a designated satellite accumulation area) that is covered or protected from the weather; has an impermeable floor surrounded by curbing, or uses spill pallets; and is more than 50 feet away from the facility property line if ignitable or reactive hazardous waste is stored in the area. For temporary (less than 90 days) storage, drum lid covers may be used.
  6. Manage the hazardous waste storage areas as follows:
    - Separate wastes by aisle space that will permit easy access for emergency equipment and inspections, and identify as hazardous and non-hazardous waste appropriately;
    - Arrange the containers by waste type, keeping similar hazardous wastes together with other hazardous wastes;
    - Separate any incompatible waste (e.g., acids and caustic) by a dike, berm, wall, or other containment device;
    - Turn containers so labels face the aisle;
    - Handle waste containers carefully to prevent rupture or leaks, and protect containers from extreme temperatures.
  7. A satellite hazardous waste accumulation area may be used for storage of hazardous waste that is generated infrequently and in amounts of less than 55 gallons:
    - Label drums in the satellite accumulation area with a weatherproof label containing the words "Hazardous Waste". Write the waste description on the label with a waterproof pen. Do not record the date of accumulation on the label until the drum has been filled. The commercially-available yellow and red hazardous waste labels may be used.
    - No more than 55 gallons of hazardous waste may be stored in any designated satellite accumulation area. Multiple satellite accumulation areas may be utilized, but each area must be separately identified and must be near the point of generation. Separate satellite accumulation areas may be set up for each type of waste generated, each area may accumulate up to 55 gallons of waste.

- When a drum is full, record the date on the hazardous waste label. Move the drum to a hazardous waste storage area within three days.
  - The weight of hazardous waste added to containers in satellite accumulation areas during the calendar month must be counted in determining the location's hazardous waste generator status. Hazardous wastes in satellite accumulation areas must also be counted in determining the quantity of hazardous waste in storage (accumulated) at a facility.
  - A satellite hazardous waste accumulation area must meet the following requirements:
    - located near the point where the waste is generated and a safe distance from sparks or other sources of ignition;
    - protected from weather (in a shed, maintenance, or other building);
    - have the boundaries of the satellite accumulation area clearly indicated with a painted or taped yellow stripe on the floor, or by a similar method.
8. The hazardous waste generation and inspection record is used to determine the hazardous waste generator status of the facility and to track hazardous wastes. Maintain the record as follows:
- Update the record at the station whenever:
    - hazardous waste is generated or added to a container of hazardous waste in a satellite accumulation container or hazardous waste storage area;
    - hazardous waste is removed from the site.
  - Record the following information:
    - date waste was generated;
    - waste description (e.g., benzene contaminated water, paint waste);
    - amount of waste generated and added to the container in pounds; and
    - for a container in a satellite accumulation area, the amount (pounds) of waste added, the date the waste was added, and the name of the person adding the waste.

***Inspections***

1. Inspect all container storage areas, roll-off containers, satellite accumulation areas, and piles once per week, unless your facility is a CESQG. Inspect all hazardous waste tanks daily. Check for:
  - Improperly marked or labeled hazardous waste containers and labels that are illegible or faded.
  - Missing DOT hazard warning labels used to identify waste hazard class (e.g., corrosive, flammable, liquid, etc.).
  - Excessive rust, corrosion or deformities on containers.
  - Bunges, lids, covers or tarps that are not sealed or secured.

## Hazardous Waste Management

- Piles that are not on liners or are not covered.
  - Leaks, spills or unusual odors. Identify the source of any liquids inside of containment areas. If storm water is present, follow Water Management procedures in this Handbook. If hazardous waste is present, handle as a spill.
  - On-site storage time limits.
  - Overflow/spill equipment (bypass systems, drainage systems and liquid feed cutoff systems) in good working order.
  - Cracks in concrete or erosion in the earthen dike secondary containment.
2. If leaks or spills are found, manage according to the spill response procedures found in this handbook and/or the Facility Contingency Plan.
  3. Maintain a record of the inspection results in the facility's files.
    - If any improper conditions are found during the inspection, describe the condition and include the following:
      - the date the improper condition was observed;
      - actions taken to correct the condition; and
      - the date the condition was corrected.
    - When waste is shipped, record the manifest number.
    - Retain reports for three years plus the current year. Contact the Environmental Department to determine retention after that period.

### **Training**

Because some facilities may be intermittent Large Quantity Generators, it is recommended that Operations personnel receive annual hazardous waste training. Personnel involved in the management of hazardous waste must have training in RCRA hazardous waste management procedures relevant to their positions.

Large Quantity Generators must maintain records pertaining to employee responsibilities and training. Required records include:

- Job titles for each position at the facility related to hazardous waste management and the name of the employee(s) filling each position.
- A written job description for each of the above titles. Each description should include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position.
- A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.
- Records that document that the training or job experience mentioned above has been given to, and completed by, facility personnel (e.g., attendance sheets, training certificates).

Training records must be maintained as long as an employee is employed at the facility. These training records must be accessible at the facility in either written or electronic format (Training Server).

Training records of former employees must be held for three years after the date the employee last worked at the facility. If an employee transfers to another facility, training records must accompany that employee.

New employees and transferred employees must complete required training within six months of hire date or transfer date.

Small Quantity Generators must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.

**Contingency Plans**

Large Quantity Generators are required to prepare a RCRA Contingency Plan designed to minimize hazards to human health and the environment. The Contingency Plan may be incorporated into a facility's SPCC Plan or DOT Emergency Operating Procedures manual.

The Contingency Plan, at a minimum, must:

- Describe arrangements made with local emergency response agencies;
- Direct that copies of the Contingency Plan are kept at the facility and filed with local police, fire departments, hospitals, and State and local emergency response teams that might be called upon in an emergency;
- Include names, addresses, and phone numbers of persons qualified to act as emergency coordinator and be kept up to date;
- List all alarm systems and emergency communications, and decontamination equipment, plan, their location, physical description, and capabilities of each piece of equipment;
- Contain an evacuation plan for the facility.

Small Quantity Generators must post the following information next to the main facility phone:

- Name and telephone number of the emergency coordinator;
- Telephone number of the responding fire department, unless the facility has a direct alarm; and
- Location of fire extinguishers, spill control materials, and, if present, fire/emergency alarms.

**Notifications**

Small and Large Quantity Generators may need to notify Federal and/or State authorities of their waste management activities. If the hazardous waste activity at the facility changes (e.g., facility generator status changes or a different waste code is generated), the form must be updated and re-submitted. Maintain a current notification form on file. **Immediately notify the Environmental Department of any changes of waste activity.**

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The EPA issues an EPA Identification Number to the generator. This number must be used on all waste-related documents, such as manifests and biennial reports. If a facility generates greater than 220 pounds of hazardous waste (in any calendar month) and does not currently have an EPA Identification number, contact the Environmental Department immediately.

### **Disposal**

If the total volume of hazardous wastes generated is less than 220 pounds in a calendar month, the facility is considered a CESQG. CESQG waste may be disposed at a Subtitle D landfill upon landfill approval. **Contact the Environmental Department for specific State requirements.**

Hazardous waste from a Small Quantity Generator or Large Quantity Generator can only be disposed at approved treatment, storage and disposal facilities (TSDF). Consult with the Environmental Department for the most appropriate disposal facility. Never dispose of hazardous waste in a container with other trash, by burying, using as fill material, or leaving it in a pipe excavation ditch. Waste must be disposed of within the applicable accumulation time frames based on generator status.

### **Shipping**

1. Be sure that all of the following papers are available before shipping hazardous waste to a treatment or disposal facility:
  - A current waste profile for the hazardous waste;
  - Applicable analytical data or other waste determination documents;
  - A completed Uniform Hazardous Waste Manifest; and
  - A completed Land Disposal Restriction (LDR) form, per waste, per vendor. A "Certificate of Disposal" is not required for hazardous waste. (This requirement applies to PCB waste.)
2. Be sure the transporter has been approved by the Environmental Department and has an EPA or State identification number. Contact the Environmental Department for approved hazardous waste transporters.
3. Inspect the discharge valve and line on hazardous waste tanks for proper operation before the transporter arrives to pick up the shipment.
4. When shipping drums of hazardous waste, check before and after loading to be sure all drums are in good condition and not leaking. Check to make sure all bung openings and lids are tightly closed, sealed and properly labeled per EPA and DOT.
5. Each drum must be properly labeled. Pre-printed labels may be provided by the disposal facility. Verify the labels are correct prior to loading. Each label must contain the following information:
  - The words "Hazardous Waste";
  - Generator name, address, and phone number;
  - Generator EPA identification number;

- Description of waste;
  - The 4-digit EPA waste code (the Environmental Department will provide EPA waste codes); and
  - Accumulation start date.
6. When shipping hazardous waste via a tanker truck do the following:
- Check the general condition of the truck and trailer. If the truck is making its first stop on a pick up run, inspect the interior of the tank trailer to make sure it is completely empty. If the tank is not completely empty, do not load the truck and immediately notify the Environmental Department.
  - A Company employee must be present for the entire loading process. In the event that Company employee is unable to be present for the entire loading process, equip hauler with communications device in order to reach Company employee in case of emergency.
  - Emergency spill kit must be immediately available.
  - Inspect the loading hose, pump, and other related equipment. Be sure drip pans are beneath the outlet of the storage tank drain line, intermediate hose connections, and the inlet connection on the truck. Monitor all hoses and associated equipment during loading.
  - Check for the display of proper placards and other required waste identification stickers.

**! It is the generator's responsibility to verify the correct placards are on the truck and to provide applicable placards, if not supplied by the transporter.**

7. Enter the hazardous waste manifest number on the hazardous waste generation and inspection record for each hazardous waste that is included on the manifest.
8. Check that a hazardous waste manifest and land disposal restriction (LDR) forms have been correctly completed before allowing a shipment of hazardous waste to leave the facility. The instructions for completing the manifest are on the back of the manifest. Make sure that:
- The manifest must contain the emergency contact telephone number;
  - The manifest has been completely filled out and signed;
  - The transporter (truck driver) has signed the manifest;
  - The quantity of hazardous waste and waste code shown on the manifest is correct;
  - Only a RCRA and DOT hazmat trained, Company employee signs the manifest.
9. Keep one copy of the manifest (generator's designated first copy) and give the remaining copies to the truck driver.
10. The signed original manifest must be returned to the facility or designated location from the destination facility within 35 days of shipment. Contact the disposal facility and the Environmental Department if this is not received within

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35 days of shipment. An EPA Exception Report must be filed within 45 days of the original shipment date, if the situation is not resolved.

11. Keep a signed, original copy of the manifest in the facility files or designated location for a minimum of 3 years. Contact the Environmental Department to determine retention after that period.

In **New York**, verify and document that the transporter and disposal facility have both the capacity for and ability to handle the waste, and that the disposal facility has all required permits.

In **Arizona**, a copy of the signed returned manifest shall be sent to Arizona Department of Environmental Quality within 30 days of receipt.

### Reports

By March 1st of every even-numbered year, Federal regulations require each LQG to submit a biennial report covering LQG generator activities from the previous year to the appropriate regulatory agency. Some States require this report be submitted annually.

The report contains a summary of wastes shipped, and transporters and designated receiving facilities used during the preceding year. The report also must include a description of efforts undertaken to reduce the quantity and toxicity of waste generated (waste minimization program activities) and a description of the changes in volume and toxicity of waste actually achieved compared to preceding years. The generator or an authorized representative must sign the report.

Some States may require this report for Small Quantity Generators, as well. Many States require a fee payment based on the quantity of hazardous waste generated. Contact the Environmental Department for specific State requirements.

**Generator Summary Chart**

	<b>CESQG</b>	<b>SQG</b>	<b>LQG</b>
<b>Quantity Limits</b>	100 kg (220 lbs)/ month or less  1 kg (2.2 lbs) /month or less of acute hazardous waste  100 kg (220 lbs) /month or less of acute spill residue or soil	Between 100–1000 kg (220–2,220 lbs) /month hazardous waste	1000 kg (2,200 lbs) /month or more hazardous waste  >1 kg (2.2 lbs) /month or more of acute hazardous waste  >100 kg (220 lbs) /month of acute spill residue or soil
<b>EPA ID Number</b>	Not Required	Required	Required

## Hazardous Waste Management

	<b>CESQG</b>	<b>SQG</b>	<b>LQG</b>
<b>On-Site Accumulation Quantity</b>	1000 kg (2,200 lbs) or less 1 kg (2.2 lbs) or less of acute hazardous waste 100 kg (220 lbs) or less of acute spill residue or soil	6000 kg (13,320 lbs) or less hazardous waste	No limit
<b>Accumulation Time</b>	None	180 days or 270 days if disposal facility is > 200 miles	90 days
<b>Storage Requirements</b>	See Storage section above	See Storage section above	See Storage section above
<b>Off-site Management of Wastes</b>	See Disposal section above	See Disposal section above	See Disposal section above
<b>Manifest</b>	Not required	Required	Required
<b>Biennial Report</b>	Not required	Not required	Required
<b>Personnel Training</b>	Not required	Basic training required (see Training Section above)	Required
<b>Contingency Plan</b>	Not required	Emergency information posted near telephone	Required
<b>Emergency Procedures</b>	Not required	Required	Required
<b>DOT Transport Requirements</b>	Yes	Yes	Yes





## Light Bulbs

### **Classification of Light Bulbs**

Light bulbs come in a variety of shapes and sizes. Classification is necessary for proper storage and disposal.

To the extent possible, use fluorescent light bulbs that have been shown by lab analysis to be non-hazardous (vendor-supplied lab analysis may be used). Examples include GE Ecolux™, Phillips Alto™, and Sylvania Ecologic™. Non-hazardous light bulbs can be disposed as general trash. (Some non-hazardous bulbs are referred to as "green-tip" lamps.)

In **Texas** and **Tennessee**, there are special restrictions on the number of used fluorescent light bulbs that can be disposed as general trash within a calendar month.

In **New York** and **California**, low mercury ("green-tip") lamps are required to be managed as Universal Waste. Passing a TCLP analysis does not constitute exemption.

In States that have adopted the Universal Waste rules, recycle hazardous non-incandescent bulbs under the Universal Waste rule. Universal Waste rules were implemented to ease the regulatory burden of disposal for some used products including non-incandescent light bulbs. Additionally, these rules are an incentive to recycle these bulbs rather than dispose of them. With the exception of incandescent bulbs and non-hazardous fluorescent bulbs, bulbs that are not recycled must be handled as hazardous waste.

Light bulbs are divided into the following categories:

- Incandescent light bulbs. These are standard household-type and automotive light bulbs.
- Non-incandescent light bulbs. All other kinds of light bulbs including:
  - Fluorescent
  - Halogen
  - Mercury vapor light bulbs
  - Sodium vapor

Use labels and material safety data sheets (MSDS) to assist in determining the classification of a particular light bulb. If you are uncertain about the classification, assume the bulb is a non-incandescent bulb.

### **Storage**

1. Store new light bulbs in original packing to avoid breakage.
2. Store used incandescent light bulbs (intact or broken) as non-hazardous waste and place in the trash bins or containers used for general trash.
3. In States that have adopted the Universal Waste regulations for bulbs, manage and store used, intact non-incandescent light bulbs as Universal Waste as follows:

- Reuse the original packing that came with the new bulbs and tape shut
  - Mark the containers with the words "Used Lamps"
  - For Accumulation Start Date, use one of the following:
    - The earliest date that any light bulb was placed in the container.
    - Mark or label each individual light bulb with the date it first became a waste.
    - If the Accumulation Start Date is not noted on the container, maintain an inventory system on-site that identifies the date each light bulb became a waste.
  - Recycle all used non-incandescent light bulbs within one year of the date of removal from the light fixture.
4. Handle damaged or broken non-incandescent light bulbs as hazardous waste:
- Follow the Hazardous Waste procedure;
  - Carefully cleanup any debris. Follow the Spill and Release Control, Cleanup and Reporting procedure;
  - Place the broken bulbs and cleanup debris in the hazardous waste storage area, with secondary containment, and where further damage or breakage will be prevented;
  - Label the container or packaging with a hazardous waste label.

### **Special Requirement for CESQG Waste**

Facilities that are conditionally exempt small quantity generators (CESQG) can store non-incandescent hazardous fluorescent light bulbs until the end of the month. If the additional weight does not change their CESQG status, the bulbs may be put into general trash. State-specific requirements may be more stringent.

### **Disposal**

1. Used incandescent light bulbs (intact or broken) can be disposed with general trash.
2. Non-hazardous fluorescent light bulbs can be disposed with general trash. Some States require a special waste permit.
3. A CESQG may store hazardous fluorescent bulbs until the end of the month, and if the additional weight does not change their CESQG status, the bulbs may be put into general trash.
4. Recycle all used hazardous non-incandescent light bulbs at a Company-approved facility or dispose at a Company-approved hazardous waste landfill, if necessary.
5. Contact the Environmental Department for approved light bulb recyclers.

In **Arizona** and **California** CESQG facilities must dispose of hazardous fluorescent light bulbs as Universal Waste.

## Light Bulbs

### **Shipping/Transportation**

1. There are no special shipping/transportation requirements for used incandescent light bulbs.
2. Transport used non-incandescent light bulbs in DOT-approved containers that are properly labeled and in good condition (free of corrosion or other damage).
3. Use only approved transporters to ship used non-incandescent light bulbs to recycling facilities. Contact the Environmental Department for approved transporters.
4. Before loading, be sure that shipping containers:
  - Are in good condition and not leaking;
  - Have clean interiors (inspect, if possible);
  - Have secure hatches or covers; and
  - Are marked or labeled correctly.
5. Check DOT shipping papers (e.g., bill-of-lading, hazardous waste manifest) to be sure they are completed when shipping used light bulbs.
6. Contact the Environmental Department immediately, if you are notified that a shipment of used light bulbs has been rejected by a recycling facility.

### **For Further Information**

Refer to the following procedures in this Handbook:

- General Trash
- Hazardous Waste Management
- Index to Common Wastes
- Labeling
- Mercury
- Spill Control, Cleanup and Reporting

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## Mercury

### **What is Mercury?**

Elemental mercury is a silvery-white metallic liquid, commonly used in manometer differential pressure gauges and other measurement instrumentation. Other sources of mercury include thermostats, electrical switches and certain types of light bulbs (see Light Bulbs procedure).

**In general, the use of mercury-containing devices should be discontinued when mercury-free alternatives are available.**

**Mercury poses certain safety hazards. (Refer to the MSDS for further information.)**

In States that have adopted the Universal Waste rules, recycle mercury-containing equipment under the Universal Waste rule. Universal Waste rules were implemented to ease the regulatory burden of disposal for some used products including mercury containing equipment. Additionally, these rules are an incentive to recycle these mercury containing equipment rather than dispose of them. Mercury-containing equipment that is not recycled must be handled as hazardous waste. Contact the Environmental Department for requirements to remove mercury-containing ampules from mercury-containing equipment.

### **Mercury Spills or Leaks**

**! Contact the Environmental Department if spills or leaks of mercury are found.**

1. Cleanup of mercury spills of any size require trained personnel. Mark the area involved in the spill, restrict access and contact the Environmental Department.
2. The reportable quantity (RQ) for mercury is one pound. Even small spills of mercury may be reportable. Please note that the specific gravity of mercury is 13.61, i.e., mercury is 13.61 times heavier than water; therefore, approximately 2 tablespoons of spilled mercury would be reportable. Contact the Environmental Department if a mercury spill is found.
3. Mercury-containing light bulbs that are broken must be treated as hazardous waste. Reference the MSDS to confirm whether mercury is present.
4. Do not touch mercury with bare skin and avoid inhaling mercury.
5. Store spill cleanup residues in a labeled container within secondary containment and handle as hazardous waste.

### **Storage**

1. Store elemental mercury in a heavy plastic bottle, or metal flask and seal it. Leave some headspace in the container for expansion of the contents. Keep the sealed bottle in a safe place where it will not be knocked over or broken and within secondary containment.
2. Store mercury or mercury-containing waste as hazardous waste unless analysis indicates the waste is non-hazardous.

3. In States that have adopted the Universal Waste regulation for mercury-containing equipment, manage and store used mercury-containing equipment as Universal Waste as follows:
  - Mark the containers with:
    - For mercury-containing equipment, label the container with any of the following phrases "Universal Waste-Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury-Containing Equipment."
    - For mercury-containing thermostat, label the container containing with any of the following phrases: "Universal Waste-Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)."
  - Accumulation Start Date
    - The earliest date that any universal waste was placed in the container or
    - Marking or labeling each individual item of universal waste with the date it became a waste
    - If the Accumulation Start Date is not noted on the container, maintain an inventory system on-site that identifies the date the mercury-containing equipment became a waste
  - Recycle all used mercury-containing equipment within one year of accumulation start date.

### **Disposal**

1. Recycle elemental mercury or mercury-containing waste or mercury-containing equipment whenever possible. In States that have adopted the Universal Waste rules, recycle mercury-containing equipment. Contact the Environmental Department for recycling options and Company-approved recycling facilities.
2. Characterization of mercury-containing material, e.g., mercury impacted soils, may be required prior to recycling or disposal. Contact the Environmental Department for the proper procedures to follow.

### **Shipping**

1. Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.
2. Document shipments of mercury-containing waste using a:
  - Hazardous waste manifest if the mercury-containing waste is hazardous waste.
  - DOT shipping papers (bill of lading) if the mercury-containing waste is non-hazardous.





## Naturally-Occurring Radioactive Materials (NORM) Waste

### What is NORM Waste?

Naturally-occurring radioactive material (NORM) waste can sometimes be generated from natural gas compression equipment, pipelines and materials that are in direct contact with gas processing equipment or produced liquids (particularly in equipment handling unprocessed gas). In certain cases, NORM accumulates in sufficient concentrations that it becomes regulated NORM. See Safety Handbook for safe work procedures.

The following activities may result in NORM waste:

- Tank cleaning and repair;
- Replacement of valves and piping;
- Managing or disposal of pigging residues;
- Handling tubulars;
- Cleaning/servicing separators and slug catchers;
- Servicing natural gas compressor, separators or scrubbers;
- Servicing salt water disposal wells and string filter change out; and
- Changing filters (e.g., sock filters) in liquid handling/glycol lines.

If NORM waste could contaminate the ground, cover the ground with plastic sheeting prior to beginning work. The ends of contaminated tubulars and piping should be wrapped or securely plugged to prevent release of scale during handling and storage.

### Storage

Store all NORM wastes in a DOT-approved container that will not leak or spill during transportation. Be sure that:

- The container is compatible with the waste material (use a plastic drum if the material is caustic).
- Container lids are kept closed.
- Temporary storage areas are marked with a sign bearing the words "CAUTION, NORM-Contaminated Equipment Area" and barriers are erected.

### Disposal

1. Contact the Environmental Department before disposing of any NORM wastes.
2. Dispose of all NORM wastes at an approved facility. Contact the Environmental Department for approved NORM disposal facilities.

In **Texas, New Mexico** and **Louisiana** any waste material (liquids, soil contaminated PPE, solids, etc.) must be characterized and if found to have Lead-210 greater than or equal to 150 pCi/g must be classified as NORM wastes. Contact the Environmental Department to determine whether NORM regulations are applicable to other States.

For States that do not regulate NORM wastes, characterize as per the Waste Characterization procedure of the Handbook.

**Shipping**

1. Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.
2. A shipping manifest must be completed for each shipment of regulated NORM waste. A general description of the NORM waste and emergency procedures (obtained from the Safety Department) to follow in the event of a transportation accident must accompany the load.
3. Obtain two signed copies of the manifest from the licensed transporter at the time that the waste is shipped. One of these copies is to be retained in the facility files and the other copy is to be submitted to the appropriate State agency. Give the remaining manifest copies to the transporter.
4. Copies of the written approval attained from the disposal facility prior to shipment must be maintained in the facility files along with the manifest.
5. When the regulated NORM waste has been disposed, a copy of the completed manifest should be returned to the generating facility.
6. If a copy of the manifest has not been received one week after the anticipated receipt of the NORM waste by the disposer, immediately contact the Environmental Department.

In **New York** and **Rhode Island** a hazardous waste manifest is required to ship NORM waste.

In **Texas** and **Louisiana** a State or special NORM waste manifest is required.

All other States require DOT shipping papers.

**For Further Information**

Refer to the following procedures in this Handbook:

- Hazardous Waste Management
- Non-Hazardous Waste Management
- Waste Characterization

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## Non-Hazardous Waste Management

### **What is Non-Hazardous Waste?**

Non-hazardous waste is waste that has not been found to be hazardous through testing or by generator knowledge but has special transportation and disposal requirements.

### **Storage**

1. Store non-hazardous wastes using one of the following methods:
  - In DOT-approved containers (refer to the Hazardous Waste section for definitions of DOT containers);
  - In a frac tank (bulk liquid wastes);
  - In a covered steel roll-off container with a poly-liner (e.g., bulk solid wastes like contaminated soil or used sandblasting abrasive); or
  - On a thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes).
2. When using DOT-approved containers, be sure the containers are:
  - Kept closed or sealed (except when waste is being added).
  - In good condition (not damaged, corroded or leaking).
3. Label non-hazardous waste containers (drums, roll-off containers, tanks), excluding general facility trash, with a non-hazardous waste label as soon as any waste is placed into the container. Use a waterproof pen to mark the description of the waste on the label.
4. Label waste piles with a weatherproof non-hazardous waste sign identifying the waste.
5. Store non-hazardous waste segregated from hazardous waste storage and satellite accumulation areas. Non-hazardous waste storage areas shall meet the following minimum requirements:
  - Be covered or protected from the weather;
  - For liquid waste, place in secondary containment.
6. Manage the non-hazardous waste as follows:
  - Make sure the non-hazardous waste labels on the containers are visible from the aisle;
  - Provide adequate aisle space for access by emergency equipment;
  - Handle waste containers carefully to prevent rupture or leaks, protect containers from extreme temperatures, and maintain in good condition;
  - Recommend disposal of full containers as soon as practical.

In **Pennsylvania**, the following additional storage requirements apply:

- Do not store non-hazardous waste on-site for more than one year without authorization from PADEP.

- Inspect each non-hazardous waste storage area weekly as follows:
    - Make sure containers are not leaking or rusting, there is no evidence of a release or unsafe condition.
    - Make sure waste storage piles are bermed, are on a poly liner, and that liquid on the berm/liner is collected for proper treatment and disposal.
    - Document all inspections using a weekly inspection log.
  - Document non-hazardous waste generation on a non-hazardous waste generation log as follows:
    - Record the amount in pounds of each non-hazardous waste generated. Include asbestos-containing wastes and PCB-containing wastes.
    - Calculate the amount of residual waste generated by the facility each calendar month.
7. If leaks or spills are found, manage according to the spill response procedures found in this Handbook.

**Disposal**

1. Non-hazardous waste can only be disposed at approved facilities. Contact the Environmental Department for approved facilities.
2. Recommend disposal of full containers as soon as practical.
3. Many States require special waste permits or other approval for disposal of non-hazardous industrial type waste.

**Shipping**

1. Be sure that all of the following papers are available before shipping non-hazardous waste to a treatment or disposal facility:
  - A current waste profile or analysis of the waste;
  - Completed waste manifest or bill of lading; and
  - Special waste approval documentation where applicable.
2. Be sure the hauler has been Company approved.
3. When shipping drums of waste, check before and after loading to be sure all drums are in good condition and not leaking. Check to make sure all bung openings and lids are tightly closed and sealed.
4. Keep one copy of the signed manifest or bill of lading and give the remaining copies to the truck driver.

In **Texas**, Non-RCRA (Class I), non-hazardous waste must be accompanied by a manifest.

**For Further Information**

Refer to the following procedures in this Handbook:

- Index to Common Wastes





## Oily Water

### **About Oily Water**

You can recognize oily water by the presence of a separate oily phase that usually will float on top of the water or by sheen on the surface of the water.

Common sources of oily water are:

- Storm water collected inside dikes or from outside drain systems;
- Equipment wash water;
- Air compressor condensate;
- Water from indoor floor drains; and
- Operations wastewater.

In most cases, oily water is non-hazardous. Handling of oily water is determined by the composition of the mixture and by the kinds of permits and treatment systems available at the facility.

### **Collection and Storage**

1. The facility may have an SPCC plan that has provisions for the collection and storage of oily water. Refer to that plan, if applicable.
2. Do not mix oily water with other wastes or wastewater.
3. If oily water is present within a diked area:
  - Do not release the water to the environment until absorbents or adsorbents have been used to completely remove oil or the oil sheen. A permit or drainage record may be required to discharge accumulated water. Contact the Environmental Department to determine if the water can be released to the environment;
  - Collect oily water:
    - In clean, closed top DOT containers for later processing or disposal;
    - In a process container designed for oil water storage; or
    - By using a vacuum truck that will take the oily water to an approved offsite disposal facility.
4. If the water contains chemicals other than oil, or may have contacted oil containing PCBs, testing may be required before disposal. Contact the Environmental Department for further instructions.
5. Store oily water as follows:
  - In a clean DOT container
    - Mark the container with a Non-Hazardous Waste label;
    - Store the container in a Non-Hazardous Waste Storage Area;
    - In secondary containment.
  - In a storage tank designated for oily water

**Disposal**

1. Do not send containers of oily wastewater to a landfill for disposal.
2. Dispose of oily water by:
  - Treatment in a facility wastewater unit that is permitted to treat oily water or an onsite evaporator;
  - Shipping the water to an approved off-site treatment facility.

**Contact the Environmental Department for information about onsite treatment units or approved offsite treatment facilities.**

**Shipping**

1. Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.
2. Check tank trucks and vacuum trucks to make sure that there are no leaks before they leave the facility.

**For Further Information**

Refer to the following procedures in this Handbook:

- Aboveground Storage Tanks
- Facility SPCC Plan (outside this handbook)
- Labeling
- PCBs
- Storm Water
- Used Oil
- Waste Characterization

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## Paint Removal Wastes

### About Paint Removal Wastes

Lead, cadmium, chromium, and other metals may be found in paints, primers and coatings.

Common methods used to remove paint from piping, valves, vessels and other equipment include sandblasting, scraping, sanding, grinding and solvents. If solvents are used to remove paints, refer to the Spent Solvents procedure in this Handbook. Refer to the Sandblasting Media procedure if sand is used.

Some paint may contain PCBs or may have been used to encapsulate PCBs. If paint removal involves PCB-encapsulation areas, contact the Environmental Department.

The paint removal waste must be characterized before disposal. The recommended testing parameters for sandblast debris are TCLP metals. When using solvent for paint removal, consult the MSDS and Environmental Department for waste characterization.

### Storage

1. Do not mix paint removal waste with other wastes.
2. If paint removal waste has been characterized as hazardous waste, store waste as follows:
  - In a DOT container with secondary containment.
  - Mark the container with a "Hazardous Waste" label and include the required information;
  - Store the container in a hazardous waste storage area;
  - Record waste on the appropriate facility waste tracking record.
3. If a paint removal waste has been characterized as non-hazardous waste, store the waste as follows:
  - In a DOT container;
  - Mark the container with a "Non-Hazardous Waste" label and include the required information;
  - Store the container in a non-hazardous waste storage area;
4. If you are unsure whether or not a paint removal waste is a hazardous or non-hazardous waste sample the waste and, while awaiting results, store the waste as follows:
  - In a DOT container with secondary containment;
  - Label all containers with the words "Potentially Hazardous Waste Awaiting Characterization" and include:
    - The description of the waste contents;
    - Accumulation start date (the date the waste was added to the container)

- The sample date and sample ID number may also be included on the label.
- Handle containers as specified in the Hazardous Waste procedure until sample results are received;
- Upon receipt of sample results, follow the labeling requirements applicable to the characterization.
- Record waste on the appropriate facility waste tracking record. If the waste later proves to be non-hazardous by testing, remove the waste from the waste tracking record.

**Disposal**

Dispose of paint removal waste as hazardous or non-hazardous waste based on the results of the characterization.

**Shipping**

1. Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.
2. Document shipments of paint removal waste using a:
  - Uniform hazardous waste manifest if the paint removal waste is hazardous waste.
  - Non-hazardous waste manifest or bill of lading if the paint removal waste is non-hazardous.

**For Further Information**

Refer to the following procedures in this Handbook:

- Facility and Right of Way Construction, Maintenance and Demolition
- Hazardous Waste Management
- Labeling
- Non-Hazardous Waste Management
- PCBs
- Sampling and Analysis
- Sandblasting Media
- Spent Solvents
- Waste Characterization

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## PCBs

### **What are PCBs?**

Polychlorinated Biphenyls (PCBs) are chemicals that were used as additives in oils and other fluids where heat resistance and durability was needed. Because PCBs do not break down easily in the environment and are toxic at elevated levels, handling of wastes containing PCBs is highly regulated. PCB wastes are generally any wastes that contain 50 ppm or more of PCBs (or result in a wipe sample equivalent of 10 ug /100 cm<sup>2</sup> for surfaces). However, for **remediation** waste resulting from releases of PCBs, the waste may be considered to be a "PCB waste" at lower concentrations. Consult with the Environmental Department for handling of any PCB remediation wastes.

Wastewater or other wastes that may contain PCBs in any concentration may be regulated and require special disposal procedures. Contact the Environmental Department for further direction.

Note: If the waste is a transformer that has been drained of all free flowing dielectric fluid, it is not considered to be a PCB waste unless the fluid contained 500 ppm or more of PCBs.

The following are examples of equipment and materials that may contain PCBs:

- Electrical equipment that contains dielectric oils or waxes, including: fluorescent light ballasts, transformers, capacitors, circuit breakers, voltage regulators, etc.;
- Compressed air systems, including, but not limited to air compressors, dryers, piping, receiver tanks, and desiccant;
- Tanks, starting air systems, piping and other equipment that utilize compressed air systems;
- Abandoned piping and valves;
- Hydraulic fluids;
- Contaminated solvents and used oils;
- Oil-based machining coolant;
- Heat exchanger oils;
- Soil and slab material containing spills or leaks from PCB-containing equipment;
- Air compressor and associated vessels;
- Natural gas pipeline liquids including: pigging sludge, condensates, scrubber bottoms and scrubber filters; and
- Coal tar pipe coating.

Further information is available in El Paso Pipeline Group's PCB Standard Operating Procedures (SOPs) contained outside this handbook. For coal tar pipe coating, further information is available in the Managing Pipe Coating That May Contain PCBs document (outside this handbook). Contact the Environmental Department.

Consult with the Safety Department for proper personal protective equipment and other handling requirements.

### **Identifying Possible PCB Wastes**

1. Contact the Environmental Department regarding any item or waste known or suspected to contain PCBs before it is sampled, removed from service, or stored.
2. Before working on transformers and other electrical equipment, determine if the equipment contains PCBs:
  - Check any existing PCB equipment log for the facility.
  - Look for labels or stickers on the equipment showing the PCB status.
  - If the equipment may contain PCBs and has not previously been tested, contact the Environmental Department.
3. For transformers that are on Company property but belong to a third-party:
  - If the transformer is not clearly labeled "Contains No PCBs", handle it as a PCB-containing transformer.
  - Immediately notify the Environmental Department and the owner if you see oil leaking from the transformer.
4. In the following States, PCB wastes are hazardous wastes and all hazardous waste requirements must be followed in addition to those listed in this procedure:
  - **Massachusetts, New York and California** wastes or used oil containing PCB concentrations of 50 ppm or more.
  - **Rhode Island**, wastes or used oil containing PCB concentrations of 10 ppm or more.

### **Storage**

1. PCB wastes may be stored on site for less than 30 days provided that:
  - Articles and containers are not leaking;
  - PCB waste is in DOT-approved containers or a stationary bulk storage tank;
  - Containers are marked with the proper PCB label ( $M_L$  mark). The basic PCB label is 6"x 6", white or yellow, which can be reduced as small as 2"x 2";
  - Storage area is marked with proper PCB label ( $M_L$  mark); if storage area is located inside a building, building must also be labeled;
  - Storage area is covered by facility SPCC plan;
  - PCB containers are labeled with the date the PCB waste was generated or the PCB article was removed from service, not the date when placed in storage. Enter this information on the PCB waste log; and
  - Containers or equipment are protected from the weather.

2. In addition to the above requirements, PCB wastes stored for 30 days or longer must be stored within an EPA-defined storage area that meets the following requirements. Contact the Environmental Department for assistance in setting up a PCB waste storage area:
  - With a roof and walls to prevent exposure to rainwater;
  - With flooring and curbing constructed of concrete, cement or a non-porous material with minimum 6" high continuous curbing and containment volume equal to 2 times the largest single storage volume or 25% of the entire storage volume; and
  - Inspected at least once every 30 days.
3. The first time a generator uses the above-referenced storage area to store PCB wastes for 30 days or longer, a one-time notification to the EPA is required.
4. PCB waste **must** be disposed of (sent to final destination, received and properly disposed) within one year of it being generated. Waste should be shipped within 9 months of waste generation or the article out-of-service date to meet this requirement.
5. Regulated PCB-containing equipment stored for future use, e.g., air compressors and air dryers, must be used within 5 years of the date the equipment was taken out of service. If it is not used within 5 years, it must be handled as a PCB waste. Contact the Environmental Department if regulated PCB-containing equipment will be stored for future use.

In **Pennsylvania:**

- PCB wastes can only be stored at facilities located outside of the 100-year floodplain.
- Liquid PCB wastes with PCB concentrations of 2 ppm or more must be stored indoors in an area with a smooth and impervious floor that is surrounded by continuous curbing at least six inches high. The storage facility may not contain drain valves, floor drains, expansion joints, sewer lines, or other openings that would allow waste to escape.

**Recordkeeping**

*Annual Records*

Each facility that stores and disposes of PCBs must maintain annual records and the written annual document log of the disposition of PCBs and PCB items. As a minimum, the annual records must include:

- An Annual Document Log showing all PCB waste and PCB items taken out of service and/or disposed during the year.
- All signed manifests generated by the facility during the calendar year.
- All Certificates of Disposal that have been received by the facility during the calendar year.
- Records of inspections and cleanups performed.

**Annual Document Log**

A written annual document log must be prepared for each year that PCB waste is generated or PCB items are taken out of service. The Log must be prepared by July 1, covering the previous calendar year (January through December), and must contain detailed information about the identification of PCB waste and PCB items that are taken out of service, stored and ultimately disposed. In addition, the log must contain detailed records of all communications to every designated disposer confirming receipt of the PCB waste transported. Contact the Environmental Department for specific instructions on what information must be kept in the log.

**Records Retention**

All PCB records must be maintained for at least 3 years after the facility ceases using or storing PCBs and PCB items in regulated quantities. Contact the Environmental Department to determine retention after that period.

**Shipping**

1. Before loading, check containers to make sure that they are in good condition, are not leaking, and that all covers are secured.
2. A hazardous waste manifest must accompany each shipment of PCB waste to a disposal facility.
  - The signed original manifest must be returned to the generator from the destination facility within 35 days of shipment. Contact the disposal facility and the Environmental Department if it is not received within 35 days of shipment. An EPA Exception Report must be filed within 45 days of the original shipment date if the situation is not resolved.
  - Keep a signed, original copy of the manifest in the facility files for the period described in the Records Retention section above.
3. Company vehicles can only be used to transport PCB wastes from a Company location where the waste was generated to another Company location where the waste will be stored. Proper vehicle placards are required when transporting:
  - More than 99.4 pounds of PCB waste in containers; or
  - One or more PCB transformers with 500 ppm or more of PCBs.

In **Texas**, a State or Special Waste manifest is required.

**Disposal****Disposal in an Approved Landfill**

Contact the Environmental Department for a list of approved PCB disposal facilities. Dispose of all PCB wastes at an approved facility.

**Acknowledgement of Receipt**

If a third-party transporter is used to transport PCB wastes, contact must be made to the disposal facility, verbal or written, within 48 hours of receiving the return manifest to verify receipt of the waste. This is in addition to the return manifest.

***Certificate of Disposal***

Once the PCB Waste has been shipped to an approved disposal facility, the owner or operator of the disposal facility is required to send a Certificate of Disposal to the generator identified on the manifest (which accompanied the shipment of PCB waste) within 30 days of the date of final disposal of each PCB item identified on the manifest. The generating facility is responsible for completing this document trail. Some shipments may generate more than one certificate.

***Transfer of Property***

There are many restrictions related to the transfer of PCB-containing pipe and equipment. Contact the Environmental Department.

***For Further Information***

Refer to the following procedures in this Handbook:

- El Paso Pipeline Group's PCB Standard Operating Procedures (outside this handbook)
- Labeling
- Hazardous Waste Management
- Managing Pipe Coating That May Contain PCBs document (outside this handbook)
- Pigging Waste
- Pipe Coating
- Sampling and Analysis
- Transfer of Property and Equipment
- Used Oil
- Waste Characterization

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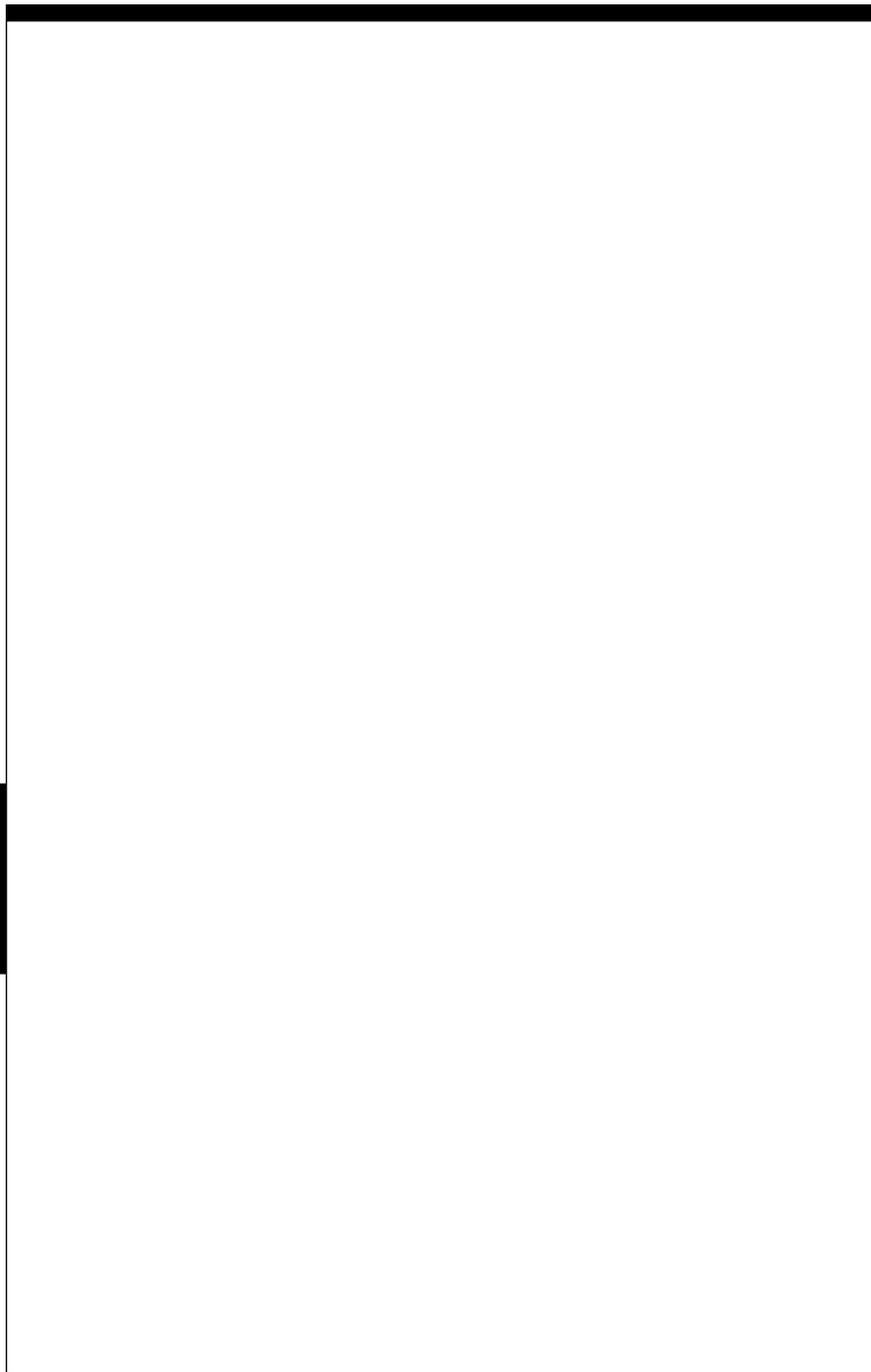
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## Pigging Waste

### **What is Pigging Waste?**

Pigging operations generate the following material: liquids, sludges and/or solids removed from a pipeline during pigging operations. Pigging Liquids are managed as either Used Oil or Condensate. Pigging Liquids that are not handled as a Condensate are discussed in the Used Oil procedure of this Handbook. If cleaning solutions other than diesel are used consult your Environmental Representative for proper classification and management.

### **Definitions**

- **Natural Gas Condensate:** Hydrocarbon liquids having sufficient BTU content to make it a marketable material.
- **Pigging Liquids:** Consist of natural gas condensate, used oil, water and/or cleaning solutions. Pigging liquids may contain a small amount of suspended solid material, but are pumpable.
- **Pigging Sludges and Solids:** Sludges consist mostly of heavy-end hydrocarbons. Solids consist mostly of rust, scale, and/or iron sulfide and are non-pumpable.

### **Pigging Sludges and Solids Management**

Pigging sludge and solids must be analyzed for hazardous waste constituents as per the Waste Characterization procedure of this Handbook.

Contact the Environmental Department for specific sampling requirements.

When Pigging Sludges/Solids are first generated, label containers (drums, tanks, roll-off containers) with:

- "Potentially Hazardous Waste Awaiting Characterization"
- Description of waste (e.g., pigging sludge)
- Accumulation Start Date (the date when waste was first put into container).

Prior to receipt of analytical results, manage as per the Hazardous Waste procedure of this Handbook including proper labeling, storage, and inspection.

Container must be relabeled, managed, and disposed as appropriate based upon analytical results.

! **Pigging Sludge/Solid that contains iron sulfide has the potential to spontaneously combust and must be kept wet at all times and stored in a sealed container to prevent ignition.**

! **With Environmental Department approval, hazardous wastes generated off-site in amounts of 220 pounds or less per site per calendar month may be transported to a Company facility for consolidation. An EPA Transporter ID Number is not required.**



## Pipe Coating

### **About Pipe Coating**

Pipe Coating helps to protect the pipe from corrosion by separating the pipe from the environment. Coatings protect aboveground structures and below ground structures. This procedure will focus on coal tar enamel and asphaltic pipe coating. For non-coal tar enamel or non-asphaltic pipe coating wastes, follow the Waste Characterization procedure of the Handbook.

### **PCB Considerations**

Because PCBs may be present in coal tar or asphaltic-type pipe coating, pipe coating should be sampled for PCBs per the "Managing Pipe Coating That May Contain PCBs" document. If the PCBs in the pipe coating are 50 ppm or greater, there are special storage and disposal requirements. Pipe coating should be sampled prior to the sale or donation of pipe to third parties, unless existing data is available for the specific coating. Pipe coating applied before 1984 may contain PCBs. Contact the Environmental Department about sampling guidelines for your Area. Coated pipe with PCBs greater than or equal to 50 ppm will not be sold or transferred unless decontaminated in accordance with the "Managing Pipe Coating That May Contain PCBs" document.

### **Asbestos Considerations**

There are special Company procedures for the inspection, removal, containment, storage, transportation, and disposal of coal tar enamel and asphaltic pipe coating ("Pipe Coating") on onshore and offshore pipelines. The type of coating typically consists of an asphalt or coal tar-like material that has been wrapped in or incorporated into an asbestos-containing fiber mesh or wrap. Because of the difficulty of determining in advance whether Pipe Coating contains asbestos or not, the Company has determined that all Pipe Coating should be treated as if it contains asbestos, unless it is conclusively proven not to contain asbestos through documentation or through appropriate laboratory analysis of samples collected through a sampling protocol approved in advance by the Environmental and Safety Department.

A **Pipe Coating Inspector** must determine if the coating in its "as-found" condition and during removal activities is "friable" or "non-friable".

**Friable asbestos material:** Any material containing more than 1 percent asbestos that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure, applied in one continuous motion. All Pipe Coating assessments must be documented by the Pipe Coating Inspector (refer to Coal Tar and Asphaltic Pipe Coating Management Plan for required Pipe Coating Inspector training).

**NOTE:** Breaking Pipe Coating into pieces does not necessarily cause it to become "friable." "Non-friable" Pipe Coating can, however, become "friable" if power tools are used to remove it or if it is cut, sawn, ground or abraded or if it becomes pulverized into a powder.

A **Pipe Coating Worker** is anyone who is handling or in the vicinity of any asbestos containing pipe coating and must complete required training (See Coal Tar and Asphaltic Pipe Coating Management Plan).

### **Special Procedures if Coating is Considered "Friable"**

If the coating is determined to be "friable", it is considered a Regulated Asbestos Containing Material (RACM). Work must stop and Environmental Department must be contacted. If RACM is present, the Inspector must determine how much is present. If the amount of RACM to be stripped, removed, dislodged or disturbed during the job is more than **260 linear feet or 35 cubic feet**, a written NESHAP notice must be filed with the Federal or delegated regulatory agency with jurisdiction over the job, and the removal of the friable Pipe Coating may not start until ten (10) **working days** after written notice has been given.

The Company has determined that the removal or disturbance of friable Pipe Coating must be done by State-licensed third-party asbestos abatement Contractors. Removal or disturbance of friable Pipe Coating in limited amounts (i.e., <1 glove bag or 3 sq. ft./3 linear ft.) may be performed by Company employees only if they meet the 16 hour "Competent Person" training O&M requirements as specified in the Safety Department's Asbestos Management Policy, Table 2.

Follow the guidance in the Asbestos Procedure of the Handbook when managing "friable" pipe coating.

### **Procedure for Removing Asphaltic Pipe Coating**

All Pipe Coating will be handled as if it contains asbestos, unless it is conclusively proven not to contain asbestos through documentation or through appropriate laboratory analysis of samples collected through a sampling protocol approved in advance by the Environmental and Safety Departments. This procedure is a minimum standard procedure to be used in conjunction with Federal regulations, State regulations, and local ordinances.

1. If the initial visual observation of the Pipe Coating Inspector determines that the coating is friable (can be crumbled, pulverized, or reduced to powder by hand pressure, applied in one continuous motion), work must cease and the Project Inspector, Environmental, and the Safety Department must be contacted prior to commencing removal activities. If the Pipe Coating is determined to be friable, the area containing the friable Pipe Coating must be demarcated and onsite personnel must be instructed to stay out of that area.
2. For non-friable Pipe Coating, place sheeting/tarp in and around the excavation so that all areas beneath and around the planned pipe cuts or Pipe Coating removal are completely covered.
3. The entire circumference of the Pipe Coating removal area must be **adequately wetted** at the beginning of the removal process and as frequently as needed to keep the Pipe Coating wet.
4. Remove the coating by manually scraping the pipe or pounding the coating using a brass mallet or equivalent. Keep the area adequately wet while working. Do not apply mechanical means such as grinders, sanders, or saws to remove

## Pipe Coating

the coating, or engage in any other activity which could pulverize or reduce the coating to powder. Wet burlap sacks may be used to act as a barrier between the coating and the mallet. Use of other Pipe Coating removal methods (e.g., water blasting) must be reviewed with the Environmental Department in advance to determine regulatory requirements that may be applicable.

5. If, during the job, Pipe Coating becomes friable, cease work and immediately contact the Project Inspector and the Environmental and Safety Departments before continuing removal activities.
6. Remove the sheeting or tarp by folding in a manner such that all of the Pipe Coating is contained within the tarp. Place all of the Pipe Coating into double 6-mil plastic bags. Seal each bag with duct tape. For larger projects, the removed Pipe Coating may be placed directly into a plastic-lined roll-off dumpster.
7. Place the Pipe Coating in a DOT-approved container or lined roll-off dumpster and label appropriately. Drums and roll-off dumpsters must be covered at all times, except when adding materials.
8. If required, a log (form to be furnished by Company) will be maintained on each container to record all activities involving the waste. Logs are typically required for projects involving multiple job sites. The log must be provided to the Area Manager or designated Company representative at the end of the job or as otherwise requested.
9. Containers will be transported to a designated secure and fenced facility in a timely manner. Full containers are not to remain on unsecured work sites longer than one (1) week. Contact the Environmental Department for appropriate disposal.
10. Prior to the beginning of the primary work activity, any pieces of loose but non-friable Pipe Coating at the job site (on the ground surface, on pipe, etc.) shall be picked up.

### ***Pipe Temporary Work-Storage and Preparation for Transport for Asphaltic Pipe Coating***

The following procedure will be used for handling pipe with non-friable Pipe Coating while in temporary storage or transport. Contact the Environmental Department for guidance in handling pipe containing friable Pipe Coating.

1. During removal, transporting, and loading, contractor or third-party pipe buyer must take precautions to prevent the Pipe Coating from becoming airborne or scattered. The precautions must include removing any significantly loose Pipe Coating from the pipe and bagging it for disposal. In addition, prior to transportation, any areas of the Pipe Coating which show indications of loosening must be removed or secured, for example, by wrapping it in pallet wrap, plastic, tape, or equivalent material.
2. Any non-friable Pipe Coating that falls from the pipe during handling must be wetted, picked up, bagged and labeled for disposal. **This is to be done no later than the end of the work day.**
3. For pipe that is expected to be stored for extended periods of time (i.e., >one (1) month) at a job site or staging area, every reasonable effort must be made

to protect the Pipe Coating from weathering and deteriorating.

4. Appropriate measures for securing the area must be taken, as well as preventing storm water run-off. Storm water permits are typically in place if there is a chance of impacting a water of the United States.
5. If the Pipe Coating becomes friable (e.g., through extensive weathering), immediately contact the Environmental Department for further guidance.
6. **Vehicle or equipment travel should be minimized on any surface area that contains Pipe Coating.**

#### ***Pipe Storage at Company Facilities or Pipe Yards for Asphaltic Pipe Coating***

This section applies to Company facilities such as compressor stations or pipe yards located at warehouse locations.

1. As a general rule, Company locations should avoid storing pipe that contains Pipe Coating.
2. During removal, transporting, and loading, adequate precautions must be taken to prevent the Pipe Coating from becoming airborne or scattered. The precautions must include removing any loose coating from the pipe and bagging it for disposal. Any Pipe Coating that falls from the pipe must be wetted, picked up, bagged and labeled for disposal. This is to be done by the end of the work day when the dislodging or the observation occurs.
3. All Pipe Coating on pipe segments or pipeline appurtenances being held for re-use or disposal must be removed according to this Plan within 90 days.
4. If special circumstances exist such that removal of Pipe Coating is not feasible, please contact the Environmental Department for further guidance as to disposal options and procedures (authorized landfills, required labeling, etc.).
5. If Pipe Coating has become friable (e.g., through extensive weathering), immediately contact the Environmental Department for further guidance.

#### ***Coal Tar Enamel and Other Asphaltic Pipe Coating – Waste Management for Non-Regulated Asbestos-Containing Material (Non-RACM) Pipe Coating***

1. Waste Storage: Place all of the Pipe Coating into double 6 mil plastic bags. Seal each bag with duct tape. For larger projects, the double bagged material may be placed directly into a plastic-lined roll-off dumpster. For small projects, the double bagged material may be placed into a DOT-approved container as needed.
2. Waste Labeling: Labels must contain the following information: **“ACM (Asbestos-Containing Material), Non-friable Pipe Coating”**. The label must also include the following information: Project ID/Name; Collection Start Date; Collection End Date; Station Name or Line Number (including valve location or mile post).
3. Waste Disposal: Containers will be transported to a designated secure and fenced facility in a timely manner. It is recommended that pipe coating is not

## Pipe Coating

stored onsite greater than 90 days prior to its disposal. Full containers are not to remain on unsecured work sites longer than one (1) week. Contact the Environmental Department for appropriate disposal. Disposal will be allowed at only approved landfills.

4. **Waste Shipment Records:** If required, a log (form to be furnished by Company) will be maintained on each container to record all activities involving the waste. Logs are typically required for projects involving multiple job sites. The log must be provided to the Area Manager or designated Company representative at the end of the job or as otherwise requested. Utilize a completed Bill of Lading to transport the material.

### **Definitions**

**Adequately wet:** Sufficiently mix or penetrate with liquid to prevent the release of particulates. If visible emissions are observed coming from asbestos-containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.

**Category I non-friable asbestos-containing material:** Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos as determined using the method specified in Appendix E, subpart E, 40 CFR part 763, Section 1, Polarized Light Microscopy.

**Category II non-friable asbestos-containing material:** Any material, excluding Category I non-friable ACM, containing more than 1 percent asbestos as determined using the methods specified in Appendix E, subpart E, 40 CFR part 763, Section I, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

**Friable asbestos material:** Any material containing more than 1 percent asbestos, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

**Non-friable asbestos-containing material:** Any material containing more than 1 percent asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

### **Regulated asbestos-containing material (RACM):**

- Friable asbestos material;
- Category I non-friable ACM that has become friable;
- Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading; or
- Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

**Working day:** Monday through Friday and includes holidays that fall on any of the days Monday through Friday.



## Refrigerants

### **What are Refrigerants?**

Refrigerants are chemicals used in air conditioning systems, refrigerators, freezers and fire extinguishers. Refrigerants that are believed to affect the ozone layer are highly regulated and releases to the atmosphere must be avoided. As such, many Title V air permits contain permit conditions relating to proper handling of regulated refrigerants.

This procedure addresses regulated refrigerants known as hydrochlorofluorocarbons (HCFC), chlorofluorocarbons (CFC or Freon<sup>®</sup>), or Halon. Other refrigerants, such as those used at cryogenic plants (e.g., propane), are not regulated, therefore, are not subject to this procedure.

### **On-site Servicing of Equipment Containing Refrigerants**

1. Use licensed contractors or licensed employees to service the cooling system of refrigerant containing equipment. Obtain a copy of the license. Do not allow any technician to work on a refrigerant system unless they can provide a valid license.
2. Do not service any equipment containing refrigerants unless the system containing the refrigerant will remain sealed. Never do any kind of work on refrigerant containing equipment that would cause refrigerant to escape to the atmosphere.

### **Storage**

Do not store used refrigerant at any Company facility. If any refrigerant is recovered from equipment during servicing, the licensed servicing technician is responsible for returning the refrigerant to the equipment or removing it from the facility.

### **Disposal**

Do not vent refrigerants to the atmosphere. Regulated refrigerants must be recovered from equipment prior to disposing of the equipment and must be sent to an approved recycler along with a certification that the refrigerant was removed per EPA regulations.

Use a licensed technician to recover the refrigerant prior to disposal.

### **Reporting**

Contact the Environmental Department for notification requirements if refrigerants are released.

### **Recordkeeping**

File service tickets and a copy of the contractor's or employee's license in the facility files and/or Title V files. No documentation is necessary when appliances are taken off-site for servicing; however, use of a licensed service company is required.



## Sandblasting Media

### **Introduction**

The most common method to remove paint from piping, valves, vessels, and other equipment is sandblasting. Sandblasting media, a.k.a. abrasive blast media, is also used to remove **non-asbestos containing** pipe coating. Special consideration must be given prior to the use of sandblasting media as both the media and paint may contain barium, cadmium, chromium, lead or other metals. Some paint may contain PCBs or may have been used to encapsulate PCBs. If sandblasting involves PCB-impacted areas, contact the Environmental Department.

Do not dispose of sandblast waste in the pipeline trench or on the ground unless allowed by the State or Federal regulatory agencies.

### **Working with Sandblasting Media**

1. Collect all sandblast media generated from blasting coated or painted pipe. Characterize the sandblasting waste prior to disposal.
2. If surfaces involved are bare metal pipe, contact your Environmental Representative for a list of States where sandblasting media is authorized for disposal in the trench or on the ground.
3. If sandblasting is being done on Bureau of Land Management (BLM), tribal lands or land designated as wetlands, the spent sandblasting media must be collected and containerized unless special permission to leave the media in the trench has been obtained.
4. Sandblasting media must be approved by the Environmental Department prior to use.

In **California** and **Arizona**, the use of California Air Resources Board-approved sandblasting media is required for all sandblasting uses.

### **Storage**

Store all collected sandblasting waste in a DOT-approved container that will not leak or spill during transportation. Be sure that:

- The container is compatible with the waste material.
- Container lids are kept closed.
- Drums are labeled correctly.

### **Disposal**

1. Reuse as much of the sandblasting media as possible to minimize the volume of waste. Sandblasting media can be reused if it is approved by the Environmental Department and was used on bare metal pipe.
2. Dispose of all collected sandblast media at an approved facility.
3. If approval has been granted to leave media in place, abide by the conditions of the approval, e.g., by burial in the trench, if required.



## Scrap Metal

### **About Scrap Metal**

Dispose of, or recycle, scrap metal promptly. Avoid the accumulation of scrap metal in "bone yards".

Scrap metal includes any kind of used metal or equipment except:

- Used equipment that may contain PCBs, NORM or mercury. Refer to PCB Waste, NORM or Mercury procedures.
- Used transmission piping or associated valves that may contain PCBs.
- Gas processing or compression equipment, equipment handling unprocessed gas, or produced liquids equipment that may contain NORM (naturally-occurring radioactive material). Refer to Naturally-Occurring Radioactive Materials (NORM) procedure.
- Mercury containing equipment, including thermostats and switches. Refer to Mercury procedure.
- Used batteries, including used automotive batteries. Refer to Batteries procedure.
- Computers and other electronic equipment.
- Used equipment that may contain refrigerants, including air conditioning systems, refrigerators, freezers and fire extinguishers. Refer to Refrigerant procedure.

If you plan to dispose, recycle or transfer outside the Company, any pipe or equipment used in gas processing, compression, or pipe or equipment handling unprocessed gas or produced liquids, contact the Environmental Department.

### **Storage**

1. Contact other Company facilities to see if they can use the equipment before considering used equipment to be scrap metal. Refer to Transfer of Property and Equipment procedure.
2. Remove friable asbestos from equipment prior to storage. Special training, certification and handling may be required. Refer to the Asbestos procedure.
3. Drain oil from equipment before placing it in storage. Refer to the Used Oil procedure when handling the used oil drained from the equipment.
4. Use only licensed contractors or licensed employees to remove refrigerants from refrigerators, freezers, and similar appliances prior to being stored. Special documentation is required. Refer to Refrigerants procedure.
5. Label all containers of scrap metal with the words, "SCRAP METAL".

### **Shipping**

Ship scrap metal using a Company-approved hauler.

**Disposal**

1. Check with other facilities to be sure that a piece of used equipment cannot be re-used before the equipment is recycled or sent for disposal.
2. Whenever possible, send scrap metal to an approved metal recycling facility.
3. Contact the Environmental Department if asbestos coated piping is being considered for release to an approved metal recycling facility. Refer to the Asbestos and the Transfer of Property and Equipment procedures.
4. If recycling is not an option, send scrap metal to an approved non-hazardous waste disposal facility or municipal landfill. Be sure to contact the trash hauler to verify that they can take larger items of scrap metal.

**Documentation**

Obtain a bill of sale, receipt, or similar documentation prior to completion of the transaction. For potentially contaminated (asbestos, etc.) scrap metal, a Bill of Sale/Purchase Agreement is required. Contact Supply Chain Management for proper documentation.

**For Further Information**

Refer to the following procedures in this Handbook:

- Asbestos
- Batteries
- Computer and Other Electronic Equipment
- Mercury
- Naturally-Occurring Radioactive Material
- Non-Hazardous Waste Management
- PCBs
- Transfer of Property and Equipment
- Used Oil

Notes:

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## Spent Solvents

### About Spent Solvents

Spent solvents may result from tasks such as painting and parts washing. The following are common examples of spent solvents:

- Acetone
- Diesel
- Methyl ethyl ketone (MEK)
- Naphthalene-based liquids (e.g., Safety Kleen Solvent 150™)
- Paint thinner and mineral spirits
- Toluene
- Xylene

Depending on their properties, spent solvents may either be hazardous or non-hazardous waste. All of the above solvents except diesel and naphthalene-based liquids must be handled as hazardous waste. Otherwise, use chemical analysis or generator knowledge to classify waste solvents. Some solvents are "listed" hazardous wastes when they are spent or rendered unusable. Xylene, toluene, 1, 1, 1-trichloroethane, trichloroethylene and MEK are examples of listed hazardous wastes.

**! Any amount of a listed hazardous waste mixed with a non-hazardous waste makes the mixture a hazardous waste whether or not an analysis of the mixture shows it to be characteristically non-hazardous. It is recommended to use only non-hazardous solvents where possible.**

### Storage

1. **! If your facility has separate used oil and spent solvent collection systems, do not mix used oil with spent solvents.**
2. If your facility has a combined used oil and spent solvent collection system, only approved non-hazardous solvents may be put into the collection system, e.g., Exxsol D80™. All other solvents must remain separated from the collection system.
3. **! Do not mix spent solvents with other wastes.**
4. Record amounts of hazardous waste on a facility waste tracking log.
5. Store spent solvents known to be hazardous waste as follows:
  - In a closed top DOT container;
  - Mark the container with a "Hazardous Waste" label;
  - Mark the date the waste was placed in the container on the label and the description of the waste contents; for satellite accumulation, the accumulation start date is not required until the drum is full.

- Store the container in a hazardous waste storage area.
6. If a spent solvent has been characterized and shown to be a non-hazardous waste, store the waste as follows:
    - In a closed top DOT container;
    - Mark the container with a Non-Hazardous Waste label;
    - Store the container in a Non-Hazardous Waste Storage Area;
    - If using a combined collection system, mark as "Used Oil".
  7. If you are unsure whether or not a spent solvent is a hazardous or non-hazardous waste sample the waste and, while awaiting results, store the waste as follows:
    - In a DOT container;
    - Label all containers with the words "**Potentially Hazardous Waste Awaiting Characterization**" using waterproof marker, and include:
      - The date the waste was placed in the container and the description of the waste contents; for satellite accumulation, the accumulation start date is not required until the drum is full.
      - The Sample Date and Sample ID Number may also be included on the label.
    - Handle containers as specified in the Hazardous Waste Management procedure until sample results are received;
    - Upon receipt of sample results, follow the labeling requirements applicable to the characterization.
    - Record waste on the appropriate facility waste tracking record. If the waste later proves to be non-hazardous by testing, remove the waste from the waste tracking record.
  8. Spent solvents may be regulated as an "insignificant" source of air pollution under Title V air permit rules. To minimize emissions keep all containers, including self-contained parts cleaners, closed when not in use.
  9. If the spent solvent is in a self-contained parts cleaner, the spent solvent is not considered to be a waste until it is removed from the unit. There are no special storage requirements until the spent solvent has been removed from the unit. Secondary containment is required for parts washers containing solvent unless located within a building with a closed-system drain or no drain.

### **Disposal**

1. Do not dispose of spent solvents with general trash regardless of the amount.
2. Recycle spent solvents by sending them to an approved recycling facility.
3. Contact the Environmental Department for approved recycling or disposal facilities.



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## Used Oil

### What is Used Oil?

Used oil is oil refined from crude oil or any synthetic oil that has been used and is contaminated by physical or chemical impurities as a result. In general, used oil intended for recycling is excluded from regulation as a hazardous waste, even if the used oil exhibits a hazardous waste characteristic (e.g., ignitability, metals).

Sources of used oil include:

- engine crankcases
- pump units
- hydraulic systems
- diesel used as a solvent (for pigging or cleaning scrubbers)
- transformers
- heat exchangers
- machines using oil-based coolant or cutting oil

Natural gas condensate that is removed from the pipeline is a fuel and may be handled as a product. Pipeline liquids that are not handled as a product may be handled as used oil. Solids removed from used oil, e.g., tank bottoms and pipeline sludge, are not used oil and must be treated as a waste.

Used oil that is not recycled must be characterized and, if hazardous, managed as a hazardous waste. In some States, used oil is classified as a hazardous waste.

In **Connecticut**, used oil is a "regulated waste" and this procedure does not apply.

In **California** and **Massachusetts**, used oil is hazardous waste and this procedure does not apply.

The following cannot be treated as used oil:

- Used oil mixed with a listed hazardous waste.
- Used oil containing greater than 50 ppm PCBs or that has been mixed with waste >50 ppm PCBs. By contract, some used oil recyclers will not accept used oil containing >2 ppm PCBs.
- Used oil containing more than 1,000 ppm of total organic halogens (TOX). In this case, the used oil is presumed to have been mixed with a hazardous waste and must be handled as a hazardous waste.
- Used oil mixed with a characteristic hazardous waste when the mixture exhibits the hazardous waste characteristic of corrosivity, reactivity or toxicity.

### Storage

1. If your facility has separate used oil and spent solvent collection systems, do not mix used oil with spent solvents.
2. If your facility has a combined collection system, only approved non-hazardous solvents may be put into the collection system, e.g., Exxsol D80™.
3. Never mix used oil with any other waste. Do not pour used oil on the ground or use it to control dust or weeds. Never pour or drain used oil into any drain or

sump unless it is connected to a used oil storage system. Minimize addition of water to used oil.

4. All transformer oils must be sampled for PCBs and results reviewed by the Environmental Department prior to adding the transformer oil to a used oil tank.
5. Store used oil in a marked drum used only to store used oil or in a used oil storage tank. If used oil is stored in a drum, the drum should be in good condition and be stamped, embossed or stenciled by the manufacturer with a UN code (for example, UN1A1, UN1H2, etc.).
6. The used oil regulations specify that the drum or tank must be permanently marked with the words, "Used Oil" (not "Waste Oil" or "Dirty Oil"). For tanks, lettering shall be at a minimum 3 inches high and visible from direction of normal approach.

In **Pennsylvania**, use the words "Waste Oil".

7. Store used oil drums in secondary containment (e.g., bermed area, building which can contain minor spills, or spill pallet).
8. Used oil storage containers must be:
  - Maintained in good condition (no severe rusting, no visible structural defects, no deterioration);
  - Properly labeled;
  - Free of leaks;
  - Kept closed at all times;
  - Stored to prevent releases to the environment.

In **New York**, tanks containing used oil and pipeline condensate must be registered under the Petroleum Bulk Storage Regulation.

### **Disposal**

1. Verify that used oil does not contain regulated levels of PCBs and TOX before shipment to a recycling or disposal facility. This may be determined by Company or vendor testing or by process knowledge.
2. All used oil recyclers must be approved in advance by the Environmental Department. Never use used oil to control dust or weeds.
3. Contact the Environmental Department for instructions if you must dispose of used oil that has been mixed with any other waste (it may need to be disposed of as hazardous waste).

### **Shipping**

#### **Transportation of Used Oil in Company Vehicles**

Do not transport used oil with Company vehicles unless:

- You are collecting used oil so that it can be combined into a larger lot;
- The used oil was generated at Company facilities by Company operations; and

## Used Oil

- You are transporting no more than 55 gallons of used oil at any one time, unless you are an EPA-registered used oil transporter.

### *Transportation of Used Oil by Commercial Haulers*

1. Verify that all haulers transporting used oil have been approved by the Environmental Department and have an EPA identification number.
2. Position an emergency spill kit near loading/unloading area in case of spill. Before and after loading, check all containers to ensure they are in good condition and are not leaking.
3. Inspect the discharge valve and line on used oil tanks for proper operation before the hauler arrives to pick up the used oil.
4. A Company employee must be present for the entire loading process. In the event that Company employee is unable to be present for the entire loading process, equip hauler with communications device in order to reach Company employee in case of emergency.
  - Inspect the loading hose, pump, and other related equipment. Be sure drip pans are beneath the outlet of the storage tank drain line, intermediate hose connections, and the inlet connection on the truck. Monitor all hoses and associated equipment during loading.
5. Check that a bill of lading, invoice or manifest has been completed before allowing a shipment of used oil to leave the facility. Make sure that:
  - The document has been completely filled out and signed;
  - The transporter (truck driver) has signed the bill of lading;
  - The quantity of used oil shown is correct (volume removed and hauling volume should match).
6. Keep one copy of the bill of lading, invoice or manifest and give the remaining copies to the truck driver.

In **Louisiana**, shipments of used oil must be recorded on a manifest form provided by the State.

### **For Further Information**

Refer to the following Procedures in this Handbook:

- Hazardous Waste Management
- Labeling
- PCBs
- Pigging Waste
- Product Storage
- Spent Solvents
- Waste Characterization
- Waste Management Planning



## Waste Characterization

### **What is a Waste?**

In general, a waste is any material that no longer serves its original purpose.

A waste is any material that:

- Consists of garbage, refuse, sludge or spent materials;
- Is normally disposed of, burned or incinerated;
- Will be recycled, including reclamation and burning for energy recovery (used oil is subject to specific regulations and is not addressed by this procedure);
- Is applied to the ground intentionally or accidentally through spills or leaks (this does not include materials intended for application to the ground, like pesticides, if they are used in accordance with the manufacturer's instructions).

If you are unsure whether or not a material is a waste, contact the Environmental Department.

### **Identifying Wastes**

1. To the extent possible, identify the category of waste that will be generated prior to its generation.
2. Contact the Environmental Department to determine if there are methods available to minimize the wastes, and to prepare for storage and disposal.
3. Wastes fall into one of the following four categories:
  - Hazardous wastes are wastes that are "listed" or meet one of the hazardous waste criteria identified in the section below. These wastes require special handling and disposal. States may specify additional wastes that are considered hazardous.
  - Special wastes do not meet the criteria for hazardous wastes, but may present special hazards or require special handling. Examples of special wastes are asbestos, polychlorinated biphenyls (PCBs), radioactive waste, and naturally-occurring radioactive material (NORM). Some States have their own classification of special wastes.
  - Universal Wastes. To reduce the amount of hazardous waste in municipal solid waste streams, EPA and many States recognize batteries, thermostats and lamps, e.g., fluorescent light bulbs, as "Universal" and thus allow easier handling of these wastes.
  - Non-hazardous wastes. Wastes that do not fall into the previous categories. This includes general trash.

### **Hazardous Waste Criteria**

A waste that meets any one of the following criteria must be handled as a hazardous waste.

■ Characteristic of ignitability

- It is a liquid with a flash point of less than 140 degrees F. (Flash point is not applicable to solids)
- It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard.
- It is an ignitable compressed gas.
- It is an oxidizer.

A waste that exhibits the characteristic of ignitability has the EPA Hazardous Waste Code of D001.

■ Characteristic of corrosivity

- It is aqueous and has a pH less than or equal to 2 or greater than or equal to 12.5.
- It is a liquid and corrodes steel (SAE 1020) at a rate greater than 6.35 mm (0.250 inch) per year.

A waste that exhibits the characteristic of corrosivity has the EPA Hazardous Waste Code of D002.

■ Characteristic of reactivity

- It is normally unstable and readily undergoes violent changes without detonating.
- It reacts violently with water.
- It forms potentially explosive mixtures or toxic gas with water.
- It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment.
- It is capable of detonation or explosive reaction.

A waste that exhibits the characteristic of reactivity has the EPA Hazardous Waste Code of D003.

■ Toxicity characteristic

- A waste exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure (TCLP) the waste contains any of the contaminants listed in the below table at the concentration equal to or greater than the respective value given in that table.

A waste that exhibits the characteristic of toxicity has the EPA Hazardous Waste Code specified in the table below which corresponds to the toxic contaminant causing it to be hazardous.

*See table on next page.*

## Waste Characterization

### Maximum Concentration of Contaminants for the Toxic Characteristic

EPA Waste Code	Contaminant	Regulatory Level (mg/l)
D004	Arsenic	5.0
D005	Barium	100.0
D018	Benzene	0.5
D006	Cadmium	1.0
D019	Carbon tetrachloride	0.5
D020	Chlordane	0.03
D021	Chlorobenzene	100.0
D022	Chloroform	6.0
D007	Chromium	5.0
D023	o-Cresol	200.0
D024	m-Cresol	200.0
D025	p-Cresol	200.0
D026	Total Cresol	200.0
D016	2,4-D	10.0
D027	1,4 Dichlorobenzene	7.5
D028	1,2 Dichloroethane	0.5
D029	1,1 Dichloroethylene	0.7
D030	2,4 Dinitrotoluene	0.13
D012	Endrin	0.02
D031	Heptachlor (and its epoxide)	0.008
D032	Hexachlorobenze	0.13
D033	Hexachlorobutadiene	0.5
D034	Hexachloroethane	3.0
D008	Lead	5.0
D013	Lindane	0.4
D009	Mercury	0.2
D014	Methoxychlor	10.0
D035	Methyl ethyl ketone	200.0
D036	Nitrobenzene	2.0
D037	Pentachlorophenol	100.0
D038	Pyridine	5.0
D010	Selenium	1.0
D011	Silver	5.0
D039	Tetrachloroethylene	0.7
D015	Toxaphene	0.5
D040	Trichloroethylene	0.5
D041	2,4,5-Trichlorophenol	400.0
D042	2,4,6-Trichlorophenol	2.0
D017	2,4,5-TP (Silvex)	1.0
D043	Vinyl chloride	0.2

**Listed Hazardous Wastes**

Listed hazardous wastes are wastes on EPA's list of specifically defined wastes in one of the following categories:

1. Unused Commercial Chemical Products with the EPA identification numbers beginning with the letter "U" (toxic) or "P" (acutely toxic).
2. Industry process-type wastes with the EPA identification numbers beginning with the letter "K" (specific industry) or "F" (individually listed wastes).

**Waste Characterization**

1. The Environmental Department maintains waste profiles that list the characterization results for various wastes. The profiles for specific wastes generated and characterization data must be maintained on file at the location or readily available.
2. Prior to shipping a new or existing waste, the waste must be characterized using test results or knowledge of the process generating the waste, to determine the proper handling requirements for that waste. The information below is used to characterize a waste:
  - The source of the waste;
  - Material Safety Data Sheets (MSDS) for materials making up the waste; or
  - Laboratory results from testing of the waste, if available. Contact the Environmental Department for waste sampling instructions.
3. Refer to the specific procedure in this handbook for the handling requirements for your specific waste. If you have a question on how to characterize a waste, contact the Environmental Department.

**Storage of Wastes Awaiting Characterization**

1. **! The storage of hazardous wastes of certain volumes and for certain time frames triggers regulatory requirements. Before actually generating and storing any hazardous waste, contact the Environmental Department for detailed instructions. By advanced planning, regulatory pitfalls can be avoided.**
2. Sample wastes awaiting characterization in accordance with the Sampling and Analysis procedure. While awaiting results, store the waste as follows:
  - In a DOT container;
  - Label all containers with the words "**Potentially Hazardous Waste Awaiting Characterization**" and include:
    - The description of the waste contents and the date the waste was placed in the container;
    - The Sample Date and Sample ID Number may also be included on the label.
  - Handle containers as specified in the Hazardous Waste procedure until sample results are received;





## Waste Management Planning

### Introduction

Handling and disposal of waste adds significant expense to our operations. Three strategies can reduce the expenses associated with waste management:

- Waste minimization results in lower costs for storage and disposal of waste. In addition, waste minimization may be required by regulation.
- Segregation of wastes prevents unnecessary disposal of non-hazardous waste as hazardous waste.
- Good housekeeping practices provide a safe working environment and reduce overall waste.

The Environmental Department must report waste minimization activities to the EPA or the State for all facilities that generate large quantities of hazardous waste.

### Waste Minimization

Use the following strategies to minimize waste:

- Before performing work, plan ways to minimize the amount of waste that will result. Prepare a Waste Management Plan prior to commencement of work on a Capital or O & M Project where waste may be generated.
- Substitute less hazardous material if it will do the job.
- Purchase products from vendors who will take back empty or unopened/unused containers or products.
- Order and use only the amount of material necessary to do the job. Use raw materials sparingly so that excess waste is not generated.
- Donate, where practical, products that would otherwise be waste. (Contact the Environmental Department prior to donation.)
- If possible, use products before their shelf life are exceeded using the oldest products first.
- Contact other Company facilities to see if they can use extra materials.
- Keep lids tightly closed on product containers.
- Recycle materials (cans, cardboard, glass, oil, etc.).
- Reuse materials such as paint thinners or degreasers whenever possible.
- Use a rag service that will pick up used rags and return clean ones.
- Do not improperly mix wastes.
- Use drop cloths or containers to prevent spills and to catch materials so that they can be reused.
- Require contractors to minimize waste.
- Make sure equipment is working properly (e.g., parts washers and painting equipment). As practical, use most efficient equipment available. Consider replacing chemicals/solvents in existing machines with less hazardous materials.

**Good Housekeeping Practices**

1. All product and waste must be clearly labeled and properly stored. If labeling is inadequate or illegible, expensive testing may be required to properly identify the material. Improper storage can result in contamination of the material, which may then require disposal through expensive hazardous waste methods.
2. Place all types of waste into appropriate containers or recycling bins immediately.
3. Store wastes so that they do not come in contact with rainwater. If possible, wastes should be stored in a covered area, in covered and clearly-labeled containers, or should be covered by a heavy tarp.
4. Secure lids on trashcans, trash bins, drums, recycling bins, and other waste containers so that waste stays inside. After addition or removal of material, close the container.
5. Store empty product drums and/or containers in a manner as to prevent corrosion and/or collection of rainwater. Keep lids securely closed.
6. Keep flammable and reactive wastes at least 50 feet from the property line in a designated location and store in appropriate, labeled containers.
7. Use poly-liners, tarps or other portable containment equipment constructed of a non-reactive material to catch spills or drips that may occur.
8. Keep spill control and cleanup equipment readily accessible and in good condition.
9. Clean spills promptly.

**Segregation of Wastes**

1. Keep non-hazardous waste separate from hazardous waste.
2. Do not mix waste. Mixing hazardous and non-hazardous waste may cause the entire mixture to be classified as hazardous, increasing the amount of hazardous waste requiring disposal.
3. Do not put hazardous wastes into containers holding facility trash.
4. Keep any waste (e.g., electrical switch boxes, soil, transformer oils, etc.) suspected of having any concentration of PCBs in separate containers.
5. Provide separate containers for wastes that will be recycled (e.g., batteries, glass, plastic, used oil and solvents, etc.).

**Waste Management Plan**

Prior to commencing a Capital or O & M Project where waste may be generated, complete a Waste Management Plan (WMP). The WMP should be sent as far in advance as possible prior to project commencement for Environmental Department review and approval. An approved WMP should be available onsite during project activities.

A WMP details waste streams that will be generated during a project, responsibilities for proper waste management, and any special requirements. The WMP form is



A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the user to enter their waste management plan.

## Drinking Water

### **About Drinking Water**

Drinking water at Company facilities is provided by a municipal source, well or surface water, or bottled water. Drinking water must be "potable"; that is, suitable for drinking, as described below. Water that is not potable will not be used for human consumption, hand washing, dishwashing, ice making or similar uses. If drinking water is supplied by a municipal or community operator, that operator is required to conduct monitoring and testing. The facility has no monitoring or testing requirements.

### **Facilities Regulated by the SDWA**

A drinking water system must meet the Safe Drinking Water Act (SDWA) parameters if it supplies water to an average of 25 individuals daily, at least 60 days per year at the facility, or has 15 or more service connections. If the facility is subject to SDWA regulations, then sampling must be conducted. Some States require a certified Water System Operator to operate the system. Contact the Environmental Department for specific requirements.

### **Facilities Regulated by a Permit**

If the facility is regulated by a permit, the terms and conditions of the permit will specify water sampling frequency, sample parameters, and recordkeeping requirements.

### **Drinking Water from Other Company-Operated Water Sources**

For those facilities that are not subject to a permit or SDWA parameters, El Paso Pipeline Group has developed the following best management practices to address the suitability of water for domestic uses.

### **Well or Surface Water**

If drinking water at your facility comes from an on-site water well or surface water, collect water samples annually and analyze for coliform bacteria.

If results indicate coliform bacteria is present:

1. Immediately label each water tap as "Non-Potable – Do not use for drinking, hand-washing or dishwashing."
2. Provide bottled water or other potable water for drinking.
3. Provide hand sanitizer gel or potable (bottled) water for hand washing.
4. Resample immediately for coliform bacteria and continue sampling at approximately 30 day intervals until no coliform bacteria has been detected in two consecutive samples.
5. Remove "Non-Potable – Do not use for drinking, hand-washing or dishwashing" label once coliform bacteria has not been detected in two consecutive samples.

Collect water samples every three years and have them analyzed for Company-approved SDWA parameters (including nitrate, nitrite, lead, copper, SDWA Inorganic Constituents [IOCs], and SDWA Volatile Organic Compounds [VOCs] at a minimum), using a laboratory that is approved by the Environmental Department.

If triennial results do not meet SDWA standards:

1. Post a notice in a conspicuous location indicating which SDWA standard(s) were exceeded, any potential risks associated with continued use, and what steps will be taken to correct the problem.
2. Update the notice at least annually until the condition is resolved.
3. Consult with the Environmental and Safety Departments for any additional steps to be taken.

**Recordkeeping**

Forward all analytical results to the Environmental Department. Keep a copy of the results in the facility files.

Keep records of all analytical results and associated documents in the facility files for a minimum of 12 years or as indicated by permit. Contact the Environmental Department to determine retention after that period.

**For Further Information**

Refer to the following procedures in this Handbook

- Sampling and Analysis

Notes:

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## Hydrostatic Test Water

### **What is Hydrostatic Testing?**

Hydrostatic testing is conducted to verify the integrity of new and existing pipe and related components. Water used for hydrostatic testing may become contaminated and may require special handling.

### **Preparing for Hydrostatic Testing**

**! For hydrostatic testing of new pipe or facilities, contact the Environmental Department-Pipelines Construction for further instructions.**

1. Because it can take 6 months or more to obtain necessary permits, notify the Environmental Department of any hydrostatic test as soon as possible.
2. Provide the following information to the Environmental Department:
  - Approximate date of test and discharge;
  - Planned source and volume of test water (the quality of the source water can affect compliance with the discharge permit);
  - Pipeline or equipment to be tested and whether the equipment is new or used;
  - Location of test, discharge and fill sites, (e.g., county or parish, latitude/longitude, State, etc.);
  - Receiving stream, if any, and whether the discharge will be directly into the stream;
  - Erosion control devices, if applicable;
  - The identity of any inhibitors and/or tracer dyes being used; and
  - The planned duration of the discharge.
3. As needed, arrange for frac tanks, lined ponds, transport vehicles or other equipment to be on site to hold the water until authorization to discharge is obtained or taken to a disposal facility.
4. If allowed by permit or regulation, some hydrostatic test discharges can be released in to the environment or agricultural fields or used for dust control.
5. Contact the Environmental Department to determine if source water should be sampled for the same parameters as discharged hydrostatic test water.
6. Prior to beginning hydrostatic testing, contact the Environmental Department to obtain the following:
  - Permit or other authorization from the State or local regulatory agency;
  - A list of required testing parameters;
  - The name of an approved laboratory;
  - Assistance with sampling procedures;
  - Contingency plan, in the event of a rupture during testing; and
  - Any other special instructions related to the testing or filtration design.

In **Georgia**, there are no permit requirements for hydrostatic test water; however the State has requested a courtesy notification containing the details of the test and how water quality will be protected.

In **New Mexico**, all individual discharge permit applications must go through a public notice and comment period.

**Sampling of Hydrostatic Test Water**

1. **! Provide analytical results for the hydrostatic test water to the Environmental Department immediately upon receipt from the lab. Do not discharge hydrostatic test water until analytical results have been reviewed by the Environmental Department, unless allowed by permit.**
2. Collect samples of hydrostatic test water as directed by the permit.
3. The Environmental Department will review the results and, if required by the permit, contact the appropriate agency to obtain approval to discharge. After approval is obtained, the Environmental Department will notify the Facility Management or project engineer/manager that the water may be discharged.

**Handling of Hydrostatic Test Water**

1. In the event of a rupture during the hydrostatic testing, immediately notify the Environmental Department.
2. Store spent hydrostatic test water in a frac tank, lined pond, or tanker truck until the Environmental Department notifies you that the water can be discharged, unless immediate discharge is authorized.
3. If discharge of the hydrostatic test water is allowed, be sure that all discharge controls to prevent erosion required by the State or regulatory agency are used. At a minimum, use the following discharge controls:
  - Prevent erosion by using hay bales, splash guards, or other types of energy dissipation devices;
  - Do not direct the discharges onto steep slopes. Where possible, discharge onto well-vegetated and well-drained areas.
4. If discharge of hydrostatic test water is not allowed, arrange to transport the water to a disposal or wastewater treatment facility that has been approved by the Environmental Department.

**Recordkeeping**

1. Final reports for the hydrostatic test discharge event will be completed and submitted by the Environmental Department to the appropriate agency, according to any permit requirements. Keep copies of analytical data, discharge monitoring reports, agency correspondence, permits, letters of completion, etc. in the facility files for a minimum of 3 years, or as required by permit. Contact the Environmental Department to determine retention after that period.
2. If applicable to your facility, complete and submit a Discharge Monitoring Report (DMR). Maintain copies on file for three years, or as required by permit.





## Injection Wells

### **What is an Injection Well?**

Injection wells are used to inject liquids or natural gas into the earth. Injection wells may be used for waste disposal or storage of natural gas.

Injection wells are classified as follows:

- Class I injection well – hazardous waste, municipal, and industrial waste injection wells.
- Class II injection well – wells which inject:
  - Brine or produced water into a formation for disposal;
  - Brine to control pressure in an underground storage field;
  - Natural gas or other products into an underground storage field for temporary storage.
- Class III injection well – wells for the extraction of minerals.
- Class IV injection well – wells which inject radioactive waste.
- Class V injection well – injection wells not included in Classes I, II, III, and IV, e.g., some septic systems.

Most injection wells operated by El Paso Pipeline Group are Class II wells.

It is critical that water sources be protected from contamination by substances being injected into the wells. Injection wells are regulated by the Underground Injection Control (UIC) program which is part of the Safe Drinking Water Act (SDWA).

### **Injection Well Operation**

1. Never inject any material that is not allowed under the permit for the well. Under no circumstances should materials from other companies be injected into Company injection wells. Contact the Reservoir Services Department or the Environmental Department immediately if you are unsure of what materials are allowed in a particular injection well.
2. Immediately notify Facility Management if you notice any evidence of problems with an injection well. Indications of problems with an injection well include:
  - Unusual pressure conditions
  - Loss of circulation or product
  - Leakage of fluid or gas from any equipment related to the injection well
3. Only properly trained employees are allowed to operate injection well equipment. Training includes proper operating and maintenance procedures for the equipment and procedures for notification of equipment problems.
4. Notify the Reservoir Services Department or the Environmental Department when any kind of maintenance or modification of an injection well is required.
5. A mechanical integrity test (MIT) is required every five (5) years by the UIC program. Contact the Reservoir Services Department or the Environmental



## Process Water Discharge

### **What is a Process Water Discharge?**

Examples of process water discharges include discharges from waste water treatment plants, evaporation ponds, oil/water separators, and spray irrigation equipment and pumping of building basements which may contain oil residue or other contaminants.

In general, water that has been used as wash down water, equipment cooling water, process water, storm water or water that has come in contact with oil or other contaminants is considered to be process or industrial wastewater requiring a permit to discharge, e.g., NPDES, POTW, or other discharge permits.

1. Any discharges of process or industrial wastewater may require a permit. The Environmental Department will obtain all permits.
2. If a discharge of process/industrial wastewater is found that is not covered by an existing permit, do the following:
  - Contact the Environmental Department;
  - Eliminate and/or temporarily contain and collect the unpermitted discharge for off-site disposal.

### **Handling Process Water Discharges**

1. Handle process/industrial wastewater as follows:
  - Treat in a permitted wastewater treatment system prior to discharge under a permit. Contact the Environmental Department to determine if wastewater treatment systems at your facility have been permitted.
  - Dispose in an onsite evaporation system approved by the Environmental Department.
  - Wastewaters that cannot be properly treated or disposed of on-site must be hauled or piped off-site to a permitted municipal or private facility for proper treatment and/or disposal.
2. Only use floor drains and industrial/sanitary wastewater treatment systems for their designated purposes. Do not pour any materials into floor drains unless the drains are specifically designed or permitted to handle them.
3. Immediately contact the Environmental Department if hazardous materials enter floor drains and/or the industrial wastewater or sanitary treatment facility.
4. Be sure all wastewater treatment units are properly operated and maintained on a frequency that complies with all permit conditions. A summary of permit requirements may be listed in the Compliance Action Plan (CAP).
5. Keep all ponds oil free or netted.
6. Immediately contact the Environmental Department if an upset condition is experienced at a waste water treatment unit.
7. Contact the Environmental Department if:
  - Any construction activities are planned for the facility drainage piping system;

- Any other actions or new sources/substances are proposed that may affect the wastewater treatment unit.
8. Hydrostatic test water discharges are addressed in the Hydrostatic Test Water procedure in this Handbook.

**Sampling of Process Water Discharges**

1. Follow the sampling requirements listed in the discharge permit.
2. Compare sampling results with permit limits immediately on receipt. Notify the Environmental Department if there are any permit exceedances or there are any questions about the sampling results.

**Reporting and Recordkeeping**

1. Contact the Environmental Department with details of any unpermitted discharge events.
2. Prepare and submit discharge monitoring reports (DMRs) for a discharge from the treatment system, if required by permit.
3. Keep the following information about wastewater discharges in the facility files:
  - Final permit
  - Permit application, if required by permit
  - Monitoring data, as required by permit
  - State/Federal discharge monitoring reports
  - Regulatory agency correspondence and inspection reports
  - Analytical data
4. If applicable to your facility, complete and submit a Discharge Monitoring Report (DMR) as required by the storm water permit. Maintain copies on file for three years. Contact the Environmental Department to determine retention after that period.
5. If there is a discharge from secondary containment keep copies of any required analytical data, discharge monitoring reports, agency correspondence, permits, etc. in the files. If an SPCC plan is in effect at the facility, keep copies in the SPCC files for a minimum of three years. **Note:** Some States require an NPDES permit to discharge storm water from secondary containment.
6. Authorized Company personnel must sign Discharge Monitoring Reports. If a wastewater permit is in effect at the facility, keep DMR reports for at least three years.
7. Any deviations or exceedances from the permit must be reported to the Environmental Department immediately upon discovery.

**For Further Information**

Refer to the following procedures in this Handbook:

- Hazardous Waste Management





## Septic Tanks

### **About Septic Tanks**

Septic tanks and "sanitary waste treatment systems" are essentially the same type of equipment and are addressed by this procedure.

1. Contact the Environmental Department if you have any concerns about whether any on-site septic tank systems have permits, require permits, or are in compliance with the design, construction and maintenance requirements of State agencies and/or local health departments.
2. If required, keep a copy of any permits/registrations in the files.
3. Some septic systems are considered Class V Injection Wells and are subject to special permitting and operating requirements.

### **Septic Tank System Operations and Maintenance**

**Do not discharge the septic system to any drain, ditch, system or conveyance.**

1. Do not dispose of any chemical, industrial waste materials or process waters into a septic system. Disposing of process wastewater, chemicals or other wastes in a septic tank system is illegal. Contact the Environmental Department immediately if any:
  - Hazardous materials or industrial wastes are released into the septic tank system.
  - Questions arise concerning work to be performed on or around a septic system.
  - Additional wastewater sources are being considered for addition to the system.
2. Periodically pump the sludge from the septic tank. Use only licensed contractors to pump septic systems. Retain copies of the transporter hauling ticket and the name of the facility where the waste is taken in the facility records for at least 3 years.
3. Periodically inspect the drain field or system for evidence of failures, (e.g., odors, surface water, etc.)

### **Construction, Modification or Removal of Septic Tank Systems**

1. Contact the Environmental Department prior to doing any of the following:
  - Construction/installation of a new septic tank system;
  - Modification, abandonment, or removal of an existing septic tank system.
2. Before starting construction, obtain copies of approvals or permits from the appropriate State agency and/or local health department, as necessary.



## Storm Water

### **What is Storm Water?**

Storm water is precipitation (rain, melting snow or ice) that is collected and carried through any system of pipes, ditches, channels, gutters, surface drains, or any other surface runoff discharged on or off of a facility or property. Storm water cannot come in contact with the following without triggering requirements for a permit:

- Raw materials, e.g., crude oil
- Intermediate products
- By-products or waste products

If storm water collects oil or other contaminants, it can lead to soil or water pollution that may require special permitting.

### **Discharges Requiring a Storm Water Permit**

1. The following activities may require a storm water permit:
  - A discharge of a chemical that meets or exceeds the reportable quantity (as noted in CERLA), discharge to surface water with an oily sheen, or a discharge that negatively affects water quality standards.
  - Discharge of oily or contaminated water from secondary containment.
2. Contact the Environmental Department if you are unsure if your facility has or needs a permit for the discharge of storm water.
3. If your facility has a storm water permit, the Environmental Department will assist you in determining what monitoring information and sample collection and analysis are required for your facility.
4. If applicable to your facility, complete and submit a Discharge Monitoring Report (DMR) as required by the storm water permit. Maintain copies on file for three years. Contact your Division Environmental Representative to determine retention after that period.

### **Preventing Storm Water Contamination**

**Proper handling of storm water will prevent contamination and will avoid permitting requirements.**

1. Never discharge, pour, unload or release any substances into storm sewers, drainage ditches, sumps, or ground areas unless allowed by facility National Pollutant Discharge Elimination System (NPDES) or other permit.
2. If any chemicals or contaminants are discovered on the ground or in the storm water drainage system, immediately take action to clean them up.
3. Use the following practices to prevent contamination of storm water runoff:
  - Keep all raw materials and waste containers securely closed and stored away from all drainages to the extent possible.

- Contain and promptly clean up any spills, leaks, drips or blowdown residues.
  - If possible, perform equipment maintenance activities in covered areas or on top of poly-liners. Cover exposed equipment undergoing maintenance at the end of the day or before a storm begins.
4. Contact the Environmental Department if a discharge of oil or hazardous substances has occurred in association with a storm water event. A reportable quantity (RQ) is the amount of a chemical that violates applicable water quality standards or causes a film or sheen on the water surface. Such a discharge may require a Notice of Intent (NOI) and a development of a Storm Water Pollution Prevention Plan. Contact the Environmental Department for guidance on water quality standards in each State.

### **Construction and Maintenance Activities**

Pipeline construction activities or maintenance projects (at a Company facility or along rights-of-way) are exempt from Federal storm water permit requirements. Some States may require a storm water permit or Storm Water Pollution Prevention Plan. Although a storm water permit may not be required, contact the Environmental Department to review project activities (e.g., disturbance of soil or water bodies, wetlands, excavations, parking lots, etc.), which may require a storm water permit or Storm Water Pollution Prevention Plan.

### **Discharges from Secondary Containment Areas**

There may be special State conditions, permits or documentation that apply to discharges from secondary containment. If you have any questions concerning those procedures, contact the Environmental Department.

1. Before discharging any storm water from secondary containment areas (tank dikes), review any permits that apply to the facility for such discharges. Inspect the water for possible contamination. If an oil sheen can be seen on the water surface, or the water is known to be contaminated with chemicals or waste:
  - Do not discharge the water.
  - Remove the oily sheen using pads or other absorbent or adsorbent material. Dispose of used absorbents/adsorbents by following waste disposal procedures.
  - Remove the oily sheen and then discharge water from the secondary containment area.
  - If the oily sheen cannot be removed or the water is contaminated, dispose of the water at an approved disposal facility following waste disposal procedures. Contact the Environmental Department if you need further guidance.
2. Keep any required copies of analytical data, discharge monitoring reports, agency correspondence, permits, etc. in the files. If an SPCC plan is in effect at the facility, keep copies in the SPCC files for a minimum of 3 years. Contact the Environmental Department to determine retention after that period.





## Acronyms and Abbreviations

Acronym or Abbreviation	Explanation
<b>A</b>	
ACM	Asbestos-Containing Material
AST	Aboveground Storage Tank
<b>B</b>	
BACT	Best Available Control Technology
bbl	Barrel
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BOD	Biochemical Oxygen Demand
BTEX	Benzene, Toluene, Ethylbenzene, and Total Xylenes
BTU	British Thermal Unit
<b>C</b>	
CAA	Clean Air Act
CAP	Compliance Action Plan
CAS No. or CASRN	Chemical Abstract Service Registry Number
CEM	Continuous Emissions Monitor
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act (also known as Superfund)
CESQG	Conditionally Exempt Small Quantity Generator of Hazardous Waste
CFCs	Chlorofluorocarbons
CFR	Code of Federal Regulations
CIRTS	Comprehensive Incident Reporting and Tracking System
CJP	Corporate Job Plan
CO	Carbon Monoxide
CO <sub>2</sub>	Carbon Dioxide
COD	Chemical Oxygen Demand
COPP	Compressor Operations Policies and Procedures

<b>Acronym or Abbreviation</b>	<b>Explanation</b>
CRT	Cathode Ray Tube
CWA	Clean Water Act
<b>D</b>	
DAR	Duly Authorized Representative
dB	Decibel
DMR	Discharge Monitoring Report
DOJ	U.S. Department of Justice
DOT	U.S. Department of Transportation
<b>E</b>	
E&P	Exploration and Production
ECM	Environmental Compliance Manual
ECR	Environmental Construction Review
EHS	Extremely Hazardous Substance
EMS	Environmental Management System
EMIS	Environmental Management Information System
EOP	Emergency Operations Procedures
EOR	Environmental Operations Review
EPA	Environmental Protection Agency
EPCRA	Emergency Planning and Community Right to Know Act
ESA	Endangered Species Act
<b>F</b>	
FBI	Federal Bureau of Investigation
FERC	Federal Energy Regulatory Commission
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
<b>G</b>	
GACT	Generally Available Control Technology
GPD	Gallons per day
GPD/ft	Gallons per day per foot
GR/BHP-HR	Grams per brake horsepower hour

## Acronyms and Abbreviations

<b>H</b>	
H2O	Water
H2S	Hydrogen Sulfide
HAP	Hazardous Air Pollutant
HC	Hydrocarbon
HCL	Hazardous Chemical List
HEPA	High Efficiency Particulate Air
HHV	Higher Heating Value
HNO3	Nitric Acid
hp	Horsepower
HSL	Hazardous Substances List
HSWA	Hazardous and Solid Waste Act
<b>I</b>	
IC	Internal Combustion (Engine)
IOC	Inorganic Contaminants
ISO	International Standardization Organization (typically refers to standards, e.g., ISO 14000)
<b>K</b>	
kg	Kilogram
<b>L</b>	
LAER	Lowest Achievable Emissions Reduction
LDAR	Leak Detection and Repair
LDR	Land Disposal Restriction
LEPC	Local Emergency Planning Committee
LHV	Lower Heating Value
LNG	Liquefied Natural Gas
LPG	Liquefied Petroleum Gas
LQG	Large Quantity Generator of Hazardous Waste
<b>M</b>	
MACT	Maximum Achievable Control Technology
MBH (Mbh)	Thousand BTU per Hour

## Acronyms and Abbreviations

MCF	Thousand Cubic Feet
MCL	Maximum Contaminant Level
MEK	Methyl Ethyl Ketone
mg/kg	Milligrams per kilogram
mg/L	Milligrams per liter
MMCF	Million Cubic Feet
MMS	Minerals Management Service
MMSCF	Million Standard Cubic Feet
MOPP	Measurement Operations Policies and Procedures
MSDS	Material Safety Data Sheet
<b>N</b>	
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
ND	Non-detect
NEPA	National Environmental Policy Act
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NFPA	National Fire Protection Association
NGL	Natural Gas Liquids
NHPA	National Historic Preservation Act
NO	Nitrogen Oxide
NO <sub>2</sub>	Nitrogen Dioxide
NOD	Notice of Deficiency
NOE	Notice of Expiration
NOI	Notice of Intent
NOX	Nitrogen Oxides
NORM	Naturally Occurring Radioactive Material
NOS	Not Otherwise Specified
NOT	Notice of Termination
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NRC	National Response Center

## Acronyms and Abbreviations

NSPS	New Source Performance Standard
NSR	New Source Review
<b>O</b>	
O <sub>3</sub>	Ozone
O&G	Oil and Grease, or Oil and Gas
O&M	Operation and Maintenance
OEM	Original Equipment Manufacturer
OPA	Oil Pollution Act
OSHA	Occupational Safety and Health Administration
<b>P</b>	
PAH	Polyaromatic Hydrocarbons
PAR	Permit Applicability Review
PCB	Polychlorinated biphenyl
pCi	Picocuries
PDS	Project Data Sheet
PE	Professional Engineer
PEM	Periodic Emission Monitoring
pH	Hydrogen potential (measure of acidity/alkalinity)
PIF	PeopleSoft Input Form
PM	Particulate Matter
PM <sup>10</sup>	Particulate Matter less than 10 microns in diameter
PNA	Polynuclear Aromatics
POPP	Pipeline Operations Policies and Procedures
POTW	Publicly Owned Treatment Works
ppb	parts per billion
PPE	Personal Protective Equipment
ppm	parts per million
PRP	Potentially Responsible Party
PSD	Prevention of Significant Deterioration
PSM	Process Safety Management

<b>R</b>	
RACM	Regulated Asbestos-Containing Material
RACT	Reasonably Available Control Technology
RCRA	Resource Conservation and Recovery Act
RICE	Reciprocating Internal Combustion Engine
RMP	Risk Management Plan
RMRR	Routine Maintenance, Repair and Replacement
RO	Responsible Official
RQ	Reportable Quantity
<b>S</b>	
SARA	Superfund Amendments and Reauthorization Act
SCC	Standardized Combustion Code
SCM	Supply Chain Management
SDWA	Safe Drinking Water Act
SERC	State Emergency Response Commission
SHPO	State Historic Preservation Officer
SIC	Standard Industrial Code/Classification
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
SOX	Sulfur Oxides
SOP	Standard Operating Procedures
SPCC	Spill Prevention, Control and Countermeasure
SQG	Small Quantity Generator of Hazardous Waste
<b>T</b>	
TCLP	Toxicity Characteristic Leaching Procedure
TDS	Total Dissolved Solids
TLV	Threshold Limit Value
TOC	Total Organic Compounds or Total Organic Carbon
TOX	Total Organic Halogens
TPH	Total Petroleum Hydrocarbons
TPQ	Threshold Planning Quantity

## Acronyms and Abbreviations

TPY	Tons per year
TSCA	Toxic Substances Control Act
TSDF	Treatment, Storage and Disposal Facility
TSS	Total Suspended Solids
TWA	Time Weighted Average
<b>U</b>	
ug/cm <sup>2</sup>	micrograms per square centimeter
ug/L	micrograms per liter
ug/m <sup>3</sup>	micrograms per cubic meter
UIC	Underground Injection Control
URL	Universal Resource Locator (internet website address)
USCG	United States Coast Guard
USDW	Underground Source of Drinking Water
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
UTM	Universal Transverse Mercator
<b>V</b>	
VOC	Volatile Organic Compounds

Notes:

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