



MANAGEMENT OF SPECIAL WASTES

EMS ELEMENT: OPERATION



TABLE OF CONTENTS

Activity Description	3
Potential Environmental Risks	3
Recommended Operating Controls	3
Prohibited Activities	3
General Considerations.....	4
Training Requirements.....	4
Storage and Materials Management	4
Planning Requirements	5
Critical Tasks.....	5
Emergency Response	5
Inspection and Maintenance Requirements.....	5
Expected Records and Outputs.....	5
References	6
Contacts	6
Guidance Materials	6
Training Materials	6
Related Environmental Documents.....	6
Applicable Regulations.....	6



ACTIVITY DESCRIPTION

The activity of properly identifying, storing, handling, transporting, and disposing of Special Wastes. Special Waste consists of Construction, Industrial and Remedial rubbish and debris which can require special handling. Specific Special Wastes are wastes for which the receiving non-hazardous landfill may require a waste profile and manifests prior to acceptance. Its actual specification is driven by directive from the disposal site. Special Wastes include, but are not limited to:

- Construction debris- does not need to be manifested
- Non-hazardous contaminated spill response media and/or soils and other agglomerations of atypical solids for which receiving landfill acceptance does not exist and the receiving landfill requires one.
- Sand/oil trap wastes
- Asbestos-containing materials
- Non-hazardous cleanout wastes from drums, vaults, containments, tanks, and other containers
- Any other material upon which a receiving landfill sets receiving quality control standards
- Generally, any waste that is different from normal landfill trash

For DEN specifically:

- DEN Petroleum Exploration and Production (E&P) Waste
- DEN Absorbent Waste
- DEN Central Plant Chilled Water Sand Media
- DEN Sanitary Sewer Spills
- Glycol Spills /cleanup in soil

POTENTIAL ENVIRONMENTAL RISKS

The following environmental concerns are associated with these activities:

- Segregation, inventory, and profiling of specific “special” wastes for disposal
- Improper or inappropriate management and disposal of non-hazardous special wastes.

Potential consequences from performing the activity incorrectly:

- Property damage, personal injury or damage to the environment
- Noncompliance, Notices of Violations from Regulators, and related [financial and non-financial] penalties

NOTE: The following guidance applies only to Special Wastes.

Use General Waste Management to facilitate waste classification.

RECOMMENDED OPERATING CONTROLS

Prohibited Activities

“Special wastes,” per RCRA– “Subtitle C Landfill permit requirements”, must be managed according to requirements set by the receiving landfills and may require special recordkeeping, analysis,



characterization, handling, control and disposal. They should not be managed and disposed in non-compliance with these requirements.

General Considerations

- Each generator of waste is responsible for understanding waste management regulations and managing their waste accordingly; this Environmental Guideline is meant as guidance only and does not supersede any regulations.
- All waste generators must properly identify and characterize all special wastes using generator process knowledge.
- Segregate and track inventory of recyclable or reusable wastes, and reuse and recycle these materials as appropriate.
- Each generator of special waste must maintain an approved profile with the disposal facility for all special wastes.
- Small amounts of spill cleanup materials (less than approximately 5 gallons) for diesel, jet fuel, lavatory waste, oils, antifreeze, deicers, firefighting agents, etc. can be placed in the MSW compactor or commercial dumpster. THIS IS NOT TRUE of gasoline or AvGas spill cleanup or any other potentially hazardous material cleanup. Spill cleanup material in excess of approximately 5 gallons must be handled as "Special Waste."
- Occasional small animals can also be placed in the commercial waste dumpster or MSW compactors unless there is evidence of disease. The proper disposal of large or diseased animals should be coordinated with the US Fish and Wildlife representative at DIA.
- Control of manifest distribution. Manifests are ordered by WM Contract Manager and signed by same or Project Manager. Project Manager is responsible for control and inventory of manifests. PM provides contractor with signed manifests. Any unused manifests shall be returned to WM Contract Manager.

Training Requirements

- All employees involved in handling and shipping special waste should receive training to a basic level of awareness regarding the origin, handling, and disposal of special wastes.
- Employee training programs shall inform personnel at all levels of responsibility who are involved in industrial activities that may impact stormwater runoff. Stormwater training shall address topics such as spill response, good housekeeping, and material management practices. Contractor or temporary personnel shall be informed of plant operation and design features in order to prevent discharges or spills from occurring.

Storage and Materials Management

- Maintain appropriate storage area(s) for special wastes, including considerations for access, segregation, control, and pickup for disposal.
- Maintain legible labels and markings on all containers and tanks; labels on all containers must have the name of the owner of the container and an associated contact telephone number, and must clearly indicate the contents.



PLANNING REQUIREMENTS

Consider the preparation of a Waste Management Plan – this document is not required but highly recommended for fully understand the generation, control, storage and disposal implications for special wastes generated in the operators activities. In Tech Spec 01566 it states that this is initially waived but DEN ES may require the plan after consultation with the PM.

CRITICAL TASKS

Retain all records related to special waste collection and disposal. These records should be maintained on file (not required) by the operator for three years and commonly consist of:

- Waste profiles and disposal facility acceptance forms or letters, including analytical data
- Waste manifests
- Invoices from the disposal facility

EMERGENCY RESPONSE

If a spill occurs, refer to Environmental Guidance Spill Response.

- Call DEN Communications Center immediately at 303-4200 for all spills.
- Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
- Spills of any kind shall not be washed into any sewer or waterway, or onto any soils.
- Containerize all collected wastes and evaluate for proper labeling, storage, and disposal.

INSPECTION AND MAINTENANCE REQUIREMENTS

Maintain good housekeeping practices in waste collection areas. Area supervision should inspect containments for proper materials.

EXPECTED RECORDS AND OUTPUTS

Waste management records (profiles, manifests, sample results, etc.)

- Based on the disposal profile, manifests and related forms may be required. Manifests & profile forms can be obtained from the disposal facility for off-site disposal activities (manifests are required for hazardous waste).
- Operator must maintain waste management records at the facility for a minimum of 3 years.

Evidence of Training

- While formal certifications are not necessary, some form of “proof of training” (such as attendee sign-in sheets) is expected & should be maintained on file by the Operator.

MSDSs



- Manufacturers will supply these documents on demand. MSDSs should be made available to all employees and maintained on file by the Operator at the facility.

REFERENCES

Contacts

- DEN Communications Center (for spill reporting): 303-342-4200
- DEN Environmental Services: 303-342-2730, DIA.Environmental@flydenver.com
- David Fridland (Environmental Services): 303-342-2630; David.Fridland@flydenver.com

Guidance Materials

- MSDSs on raw materials
- 40 CFR Subtitle "C" and "D"
- Disposal Site limitations and conditional acceptances

Training Materials

- DEN Waste Management training materials

Related Environmental Documents

- ES-301-5.02 Spill Response
- ES-301-6.01 General Waste Management

Applicable Regulations

- DEN 40 CFR Subtitle "C" and "D" Landfill Regulations
- 49 CFR 100 – 185 DOT Regulations
- 6 CCR 1007-3, Part 261-279 State RCRA Regulations
- DEN Rules and Regulations