

PART II SPECIAL WASTE MANAGEMENT

PART II

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INTRODUCTION

Part II is designed as a guidance document to support the management and disposal of Special Wastes (i.e. solid waste), aside from hazardous waste requirements for the management of Treated Woods, Asbestos, Contaminated Soils and Industrial Solid Wastes under the provisions of the Miramar Landfill waste acceptance criteria. Special wastes fall under the provisions of Resource, Conservation and Recovery Act (RCRA), Subtitle D, for the management of non-hazardous solid waste. Although under RCRA all liquids and semisolids are classified as solid waste, <u>aqueous</u> and semi-solid substances and waste are not authorized for disposal at the municipal landfill.

CNRSW commands under the requirements of the Federal Facilities Compliance Act of 1992 must meet and comply with this waste management criteria as required by the City of San Diego, Miramar Landfill Environment Enforcement Division who is in turn regulated by permit from the Regional Water Quality Control Board under the authority of California EPA.

To identify and comply with these requirements, specialized knowledge is required. CNRSW Environmental Program, through the information provided within this guidance, will help your command understand its responsibilities towards environmental compliance for special waste management.

SECTION 8 - SPECIAL WASTE MANAGEMENT ADMINISTRATION

8.1 Purpose

To provide Commander Navy Region Southwest (CNRSW) personnel with a reference document that supports the overall management requirements for special wastes by defining your responsibilities that relate to waste identification and disposal issues. Additionally, this will establish an effective management program for special waste compliance for all areas under the cognizance of your Commanding Officer.

8.2 Command Responsibilities

- a. Operations or processes that create special waste must comply with the waste acceptance criteria as specified by the Miramar Landfill Environmental Enforcement Division and all other applicable laws or ordinances that pertain to Class III municipal solid waste landfills.
- b. Ensure command personnel assigned to manage or handle special waste can properly identify and segregate these waste from other solid wastes or trash prior to disposal.
- c. Complete and submit a Special Waste Disposal Request or Manifest with all pertinent information to the appropriate Landfill personnel as specified on the request form.
- d. Retain a copy of this documentation for your files to be used as a future reference for special waste management and disposal.

8.3 CNRSW Environmental Program Responsibilities

- a. CNRSW Environmental Program shall research, develop and disseminate specific policy or guidance and to provide oversight for the management of special wastes.
- b. Advise activities on changing environmental laws, regulations or other requirements that will impact special waste operations or disposal.
- c. Conduct special waste analysis or classifications, waste determinations, and provide technical assistance for regionalized commands to address specific questions or concerns on special waste management.

SECTION 9 - SPECIAL WASTE MANAGEMENT

9.1 Overview

- a. Special wastes are various types of industrial wastes, contaminated soils or other solid wastes which because of the physical or chemical properties have the potential for meeting the characteristics of hazardous waste, designated wastes or other wastes that are regulated by the Department of Toxic Substances Control or Regional Water Quality Control Board.
- b. After <u>lab analysis</u> has determined if these solid wastes or soils are non-hazardous, as specified by California environmental requirements, and meet the municipal landfills waste acceptance requirements, these waste may be managed as special waste and disposed of at a non-hazardous waste landfill under specific handling provisions. There is no all-inclusive list of waste which may be classified as special waste; however, these have been segregated into larger subcategories such as:
 - Treated Woods
 - Asbestos
 - Contaminated Soils
 - Industrial Solid Waste
- c. The provisions for special waste management require the requesting command to submit a special waste disposal request and corresponding lab analysis to the environmental enforcement division of the municipal landfill to be reviewed for acceptance prior to disposal.

9.2 Special Waste Disposal Request and Manifesting

- a. Prior to disposal of special wastes at the municipal landfill, a <u>special waste disposal</u> <u>request</u> must be submitted to the landfill authorities for review. This review normally takes 3-5 days after the request is received. Once the review process is complete, landfill authorities will notify you that the waste(s) are approved or disapproved for disposal at their facility and will provide you with additional disposal instructions. <u>Appendix A-1</u> is an example of a completed Special Waste Disposal Request form.
- b. After acceptance has been received from the appropriate landfill authority, the waste may be transported for disposal. A completed Special Waste Manifest must accompany these wastes to the landfill. Appendix A-2 is an example of a completed Special Waste Manifest. Each manifest has a specific tracking number assigned and must be signed by the generator of the waste and waste transporter. This document and corresponding waste disposal request submitted earlier are retained at the landfill for future reference for the types and amounts of waste received into their facility.

- c. Each shipment of special waste can (and will most likely) be inspected by the landfill enforcement division to ensure compliance with environmental regulations, landfill waste acceptance criteria and contents as specified on the manifest.
- d. Disposal requests and manifests can be obtained from the installation Environmental Office or Fee Shack located at the entrance to the Miramar Landfill. Appendix B is the CNRSW Hazardous Waste Policy Letter to landfill enforcement authorities regarding the Navy's management of treated woods in the San Diego area. Appendix C is a sample cover letter to the landfill hazardous substance enforcement team, which accompanies the initial waste disposal request.

SECTION 10 - SPECIAL WASTES

10.1 Treated Woods

- a. Treated woods are commercial or industrial woods that have been impregnated, coated or infused with chemicals, preservatives or poisons to reduce the deterioration of these woods due to weather, insects, or other specific elements in which these woods are exposed. Based on the type or concentration of the substance used to treat the wood, each specific treated wood waste must be analyzed to evaluate and classify, by type, to determine the wood's characteristics as either hazardous or non-hazardous waste. Appendix D provides an expanded definition and clarification on the types of treated wood located at naval installations. Fire/Flame Retardant Woods (FRX) typically do not contain the same chemicals; however, some have been found to require analysis for heavy metal content. For detailed information, download the DTSC Treated Wood Fact Sheet from http://www.dtsc.ca.gov/HazardousWaste/treated_wood_waste.cfm
- b. Navy representatives have met with Miramar Landfill environmental personnel, provided waste determinations and policy statement specifying how metro-area commands will manage various types of treated woods as either non-hazardous special waste or hazardous waste. However, it is still the responsibility of the command requesting disposal of treated woods as well as other special wastes to submit the appropriate disposal request, manifest or other pertinent documentation for proper waste determination to the appropriate municipal landfill authority for review.
- c. As specified below, the following treated woods have been analyzed and classified as non-hazardous and maybe transported to a municipal landfill as special waste using the criteria specified in the following sections. Although the size and amount of the below treated woods have no limitations, sawdust or other fine particulates from these woods should be placed into plastic bags and disposed of into the trash.
 - Railroad Ties
 - Pier Pilings and support structures
 - Utility Poles and support structures
 - Certain Chemically Treated Woods (i.e. FRX; "Pest-Free" USDA-APHIS pallets)
- d. Listed below are treated wood wastes, which have been analyzed and have been classified as Hazardous Waste and must be managed appropriately. However, a comprehensive review of Appendix D will provide a more detailed aspect of all wood wastes.
 - Landscaping Tree Stakes
 - Pressure Treated Woods (Green or Yellow)
 - <u>Chemically Treated Woods</u> containing chromium copper arsenate (i.e. batten boards)

10.2 Asbestos

- a. Asbestos is classified into two distinct subgroups of "Friable" and "Non-Friable". These classifications determine how and where asbestos is managed for disposal and which management practices are employed. The installation Safety Office or Industrial Hygienist will determine personnel exposure hazards, while the Environmental Office identifies disposal options.
- b. The determination of "Friability" is based on two criteria.
- 1. After analysis, if the Asbestos Containing Material (ACM) contains greater than or equal to 1% friable asbestos, meaning the ACM can be crushed, pulverized, easily crumbled into a finely divided powder or fibrous substance by using hand pressure, the ACM is classified as Friable and must be managed and disposed of as a *hazardous waste*.
- 2. After analysis, if the ACM contains less than 1% friable asbestos, as stated above, or the substance cannot be pulverized or become finely divided, (basically, the ACM is fuzzed into the substance) then, the ACM is classified as Non-friable. This type of substance may be managed as special waste for disposal at a municipal landfill.
- c. Since ACM varies from location to location and in unknown concentrations, each shipment of suspected ACM must be analyzed for asbestos content and visually inspected for friability. It is possible that non-friable asbestos may become friable during the removal process or during transportation and thus may require alternate management strategies. The list below are potential sources of ACM.
 - Older Floor Tiles
 - Roofing & Acoustic Materials
 - Ceiling Panels
 - Cement Piping
 - Piping Insulation
 - Marine Wire Cable Sheating
- d. Asbestos determination can be performed by environmental laboratories, some command safety offices or an industrial hygienist. It is imperative that documentation specifying that the asbestos percentage is provided with the Special Waste Disposal Request form and submitted to the landfill authorities for review and approval. Also, a signed statement must be included in the disposal request package stating that the ACM being disposed of contains only Non-friable asbestos.
- e. <u>Appendix E</u> provides an expanded definition and additional visual identification on specific substances that may contain asbestos. For materials such as floor tiles, look for multi-layers. Even though in most cases floor tiles are not classified as friable in the undisturbed state, during demolition, non-friable materials can become friable if heavy equipment is employed to expedite the removal.

f. For transportation to the municipal landfill for disposal as special waste, ACM must be double wrapped into a durable 6-mil thick plastic sheet, bag or film.

10.3 Contaminated Soils

- a. Soils contaminated with petroleum hydrocarbons, organic or inorganic compounds, or heavy metals may be managed as special waste, provided the soils are not contaminated with or exceed hazardous waste limits or concentration limits established by the Regional Waste Quality Control Board.
- b. With the exception of some heavy metals, the contaminates listed below are the maximum contamination levels accepted at the Miramar Landfill. All soils, which exceed these concentration levels must be managed as a hazardous or designated waste unless otherwise indicated by Navy Installation Restoration (IR) program requirements. For hazardous waste concentration limits on heavy metals, contact your respective environmental department.

Gasoline 100 mg/kg TPH
Diesel Fuel 1000 mg/kg TPH
Used/Waste Oils 2000 mg/kg TRPH
PCBs Non- Detectable
Lead 350 mg/kg

10.4 Industrial Solid Wastes

- a. Industrial wastes are solid wastes that may be potentially classified as hazardous wastes or wastes regulated by the Regional Water Quality Control Board. These wastes are generated or employed by numerous industrial processes or applications and must be determined to be non-hazardous prior to disposal at the landfill. There is no all-inclusive list of industrial wastes that may be classified as industrial solid waste. However, listed below are a few wastes that *may* meet this classification and thus be disposed of as a special waste.
 - Ion Resin Exchange
 - Desiccants
 - Phosphates
 - Bicarbonates
 - Oven Ash (Non-hazardous)
 - Polystyrene Camels not coated with Tributyl Tin (TBT)
 - Fire Extinguisher Agent (PKP)
- b. <u>Appendix F</u> provides an additional visual identification of various types of industrial wastes, which have the potential of being managed as special waste.
- c. If you have any questions on these types of industrial waste or believe your waste may be managed and classified as special waste for disposal at a municipal landfill, please contact the installation Environmental Office.

PART II

APPENDICES

Appendix A-1	Special Waste Disposal Request
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Appendix A-2 Special Waste Manifest

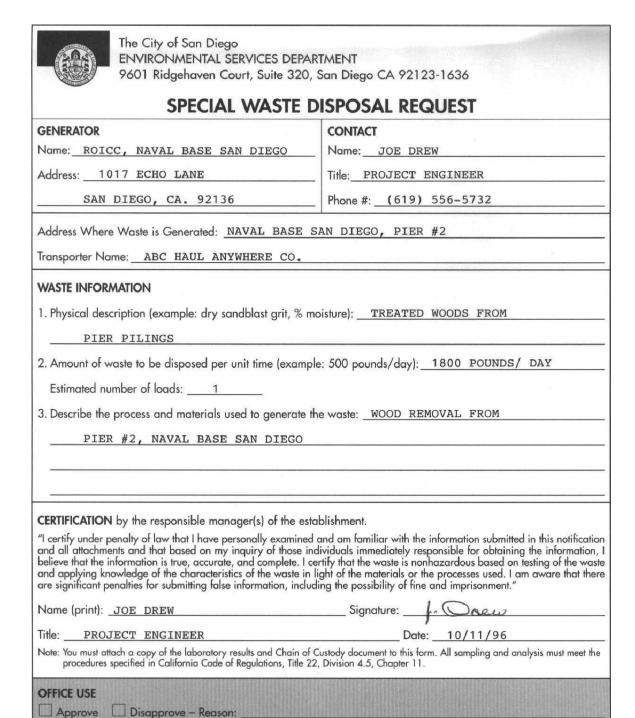
Appendix B NRSW Policy Letter

Appendix C Sample Letter to Landfill

Appendix D Treated Wood Photos

Appendix E Asbestos Materials Photos

Appendix F Industrial Waste Photos



WHITE: ENVIRONMENTAL PROTECTION CANARY: RETURN TO GENERATOR AFTER REVIEW PINK: GENERATOR RETAINS

ES-101 (Rev. 8-01)

Inspector Name: _

This information is available in alternative formats upon request.

Date:

Requirements: Special Handling Manifest None



CITY OF SAN DIEGO ENVIRONMENTAL SERVICES DEPARTMENT 9601 RIDGEHAVEN COURT SAN DIEGO, CA 92123

26099

SPECIAL WASTE MANIFEST

GENERATOR	SITE ADDRESS				
Name: ROICC, NAVAL BASE SAN DIEGO	Address: PIER #2 NB SAN DIEGO				
Address: 1017 ECHO LANE	City: SAN DIEGO Zip Code: 92136				
City: SAN DIEGO Zip Code: 92136	Phone: 556-5777 Contact: JOE DREW				
CONSULTANT/CONTRACTOR	TRANSPORTER				
Name: ROICC, NAVAL BASE SAN DIEGO	Name: HAUL ANYWHERE CO.				
Address: SAME AS ABOVE	Address: 723 HUNT AVE.				
City:Zip Code:	City: NATIONAL CITY Zip Code: 92100				
Phone: Contact:	Phone: 479–1810 Contact: MIKE SMITH				
Type of Waste: TREATED WOODS Components of Waste (percent of each component): TREATED WOODS FROM PIER PILINGS 100% The generator certifies the wastes are not hazardous or designated wastes as defined in the California Code of Regulations. Generator Signature/Title: PROJECT ENGINEER Date: 10/14/96 Transporter Signature: Date: 10/14/96					
(OFFICE USE ONLY)	Special handling Gross Wt.:				
DSR Signature:Date:	☐ Yes ☐ No ☐ Tare Wt.:				
Reviewed by:Date:	Net Wt.:				
Documentation on file: Yes No Comments:					

LANDFILL (WHITE) GENERATOR (CANARY) TRANSPORTER (PINK)

ES-045 (Rev. 11-97)

This information is available in alternative formats upon request.



DEPARTMENT OF THE NAVY COMMANDER NAVY REGION SOUTHWEST 937 NO. HARBOR DR. SAN DIEGO, CALIFORNIA 92122-0058

N REPLY REPER TO: 5090 Ser N45JHW.cg/0171 April 23, 2007

Kirk Galarneau Hazardous Substance Enforcement Environmental Programs Division City of San Diego 9601 Ridgehaven Court Suite 320 San Diego, CA. 92123-1636

Dear Mr. Galarneau:

SUBJECT: TREATED WOOD SPECIAL WASTE ONGOING PROFILE

Commander Navy Region Southwest (CNRSW) Hazardous Waste Program has relied on laboratory analysis of Treated Wood Wastes (TWWs) found at various Naval Bases in San Diego, as being representative of current materials found and used on local installations. CNRSW is updating the TWW profile with the San Diego City Miramar Landfill to incorporate the recent analytical testing of previously unexamined TWWs. The profile update incorporates three newly sampled TWWs. The 2005 analyticals from the NAVFAC Waterfront Operations revealed portions of marine fendering systems that are non-hazardous waste and other portions that are non-RCRA hazardous waste. In 2006, analyticals from Flame Retardant Woods (FRX) used on projects conducted by the Puget Sound Naval Shipyard (PSNS), resulted in a non-hazardous waste determination. In addition, analyticals from 2007 of SPAWARSYSCEN mammal pen pilings resulted in a non-RCRA hazardous waste determination.

The hazardous waste designation is based on criteria pursuant to California Health and Safety Code, Chapter 6.5 and California Code of Regulations, Title 22, Chapter 11, Articles 2 and 3. The special waste designation is based on these criteria and the acceptance criteria as a Special Waste, as specified in the City of San Diego Waste Management Regulation E-001-95. The locations covered by this profile are Department of Navy stations and facilities within or near the boundaries of the City of San Diego, as provided in the City of San Diego Waste Management Regulations D-001-94.

CNRSW finds the following treated woods meet the acceptance criteria as a Special Waste: Flame Retardant Wood (FRX) (specifically Hoquian plywood and Exterior Fire-X Type II Blue Treated FRX wood shavings); camels and sides of waterfront fenders; railroad ties; pier pilings and associated pier support structures; utility poles and associated supports; landscaping materials including planter boxes and retaining walls or other types of treated timbers or wood used in similar type applications that have become gray or faded due to weathering; and some chemically treated plywoods that are brown or gray in color.

5090 Ser N45JHW.cg/0171 April 23, 2007

Woods with pressure indentations; woods with yellow, bluish or green coatings (such as tree stakes); munitions and ordnance crates and pallets are not included in this designation and will continue to be managed separately. Analytical testing of the following treated woods have resulted in non-RCRA hazardous waste determinations: the 20x60 sections of waterfront fenders; landscaping materials (poles and decorative logs); mammal pen pilings; pressure-treated wood and Fiddler's Cove dock.

The CNRSW will update the Special Waste Management Plan (SWMP), Appendix D, which visually identifies and classifies various treated woods as either hazardous waste or special waste. If have any questions regarding this matter, please contact Ms. Christina Graulau of the Commander Navy Region Southwest, Hazardous Waste Program Office at (619) 532-2274.

Sincerely,

BRIAN S. GORDON

Director, Compliance and Technical Division

Brians S. Gord

By direction

cc: Mark Edson, NBSD Environmental Installation Program Director Phil Dyck, Pt.Loma Environmental Installation Program Director Luis Perez, NBC Environmental Installation Program Director



DEPARTMENT OF THE NAVY COMMANDER NAVY REGION SOUTHWEST 937 NO. HARBOR DR. SAN DIEGO, CALIFORNIA 92132-0058

N REPLY REFER TO: 4500 Ser N44W/555 March 15, 2003

SAMPLE LETTER

City of San Diego
Attn: Hazardous Substance Enforcement Team
Environmental Services Department
Environmental Programs Division
9601 Ridgehaven Court, Suite 320
San Diego, CA. 92123

Subj: SPECIAL WASTE DISPOSAL REQUEST FOR TREATED WOOD DISPOSAL AT NAVAL BASE SAN DIEGO

Creosote treated timbers are being removed as part of a construction and repair project at Paleta Creek and adjacent Quay-wall area at Naval Base San Diego. Enclosure (1) is submitted to comply with the waste acceptance requirements for disposal of treated wood waste at the City of San Diego Miramar Landfill.

Commander, Navy Region Southwest has conducted laboratory analysis and waste determinations for this type of treated wood, which subsequently has been classified as non-hazardous as defined, pursuant Title 22 CCR and meets the Miramar Landfill waste acceptance criteria. This waste analysis was provided to your office for concurrence in October 2002. If you wish an additional copy of this analysis please contact the Regional Hazardous Waste Program Manager at (619) 524-6351.

Sincerely,

Enclosure: (1) Special Waste Disposal Request

Copy to: Send a copy of this letter to your respective installation environmental office.

Appendix D visually identifies and classifies various types of treated woods. All woods identified within this appendix must be managed as special waste or hazardous waste. It should be noted that not all landscaping materials or construction woods would be classified as special waste. These and other types of non-treated, non-coated woods or timbers may be managed as normal wood and be reused or discarded into the trash.

NON-HAZARDOUS WASTE

The types of woods identified on the following pages have been determined by laboratory analysis to be non-hazardous waste pursuant to California environmental regulations, and are authorized for disposal at the Miramar Landfill. However, even though these woods are non-hazardous as defined, they must still be managed under the special waste requirements specified in Section 10.1.



Landscaping materials, including planter boxes and retaining walls or other types of treated timbers or wood used in similar type applications that have become gray or faded due to weathering. This does not apply to Tree Stakes, as identified in this appendix. Tree stakes, due to their arsenic content, must be managed as hazardous waste.



Planter Boxes



Retaining Walls



Pier Pilings and other associated pier support structures



Pier support structure



Utility Poles and associated supports and cross sections not used as pier pilings.



Supports and cross sections



Railroad Ties and similar types of gray or brown woods



Pressure treated woods that are brown or gray. Note the color differences between the two bottom boards and the rest of the stack. Green or yellow colored pressure treated

woods must *not* be sent to a Class III landfill for disposal. These types on woods must be segregated for alternate methods of disposal.



Chemically treated woods, look for a green or bluish coating on the outside of the wood with no pressure indentations.

HAZARDOUS WASTES

The woods identified on the following pages have been determined by laboratory analysis to have characteristics of hazardous waste and shall **not** be transported to any municipal landfill for disposal. Sort and separate these treated woods for additional waste determination and subsequent management.



Munitions and ordnance crates and pallets. Note the green and yellow colors of the pressure treated wood commingled in with Tree Stakes.



Only cylindrical tree stakes need to be managed as hazardous waste.

Commander Navy Region Southwest Waste Management Plan San Diego Metro Area





Green and yellow color treated woods with pressure indentations, regardless of size, or similar type treated woods, which contain labels identifying that the wood contains Chromated Copper Arsenic.

HAZARDOUS WASTES

The batten board have been determined by laboratory analysis to have characteristics of hazardous waste and shall **not** be transported to any municipal landfill for disposal. Sort and separate these treated woods for additional waste determination and subsequent management.

Batten Boards or Marine Fendering System is found inside amphibious ships well deck.









Batten Boards are vertically positioned.

Appendix E visually identifies various types of **Asbestos Containing Materials** (ACM). It is important to comprehend the term "<u>Friability</u>," which is any item that contains asbestos fibers in concentrations of greater than or equal to 1%, and when subjected to hand pressure can be crushed into a powdered, finely divided fibers, flakes or dust.





For piping insulation look for matte white coverings or identifying markings.



Piping Insulation



Older ceiling panels (above) and acoustic materials may contain asbestos.



Appendix F visually identifies various types of **Industrial Wastes**, which have the potential of being managed as special waste. Wastes identified within this appendix must first be analyzed to determine any potential hazardous waste classifications due to the nature of each specific individual waste characteristics. If landfill authorities discover these wastes within the normal refuse it will be flagged for removal and investigation.

A good example would be ship bumpers. These may or may not contain Tributyl Tin, a highly toxic substance used to reduce marine growth. These will be rejected unless a waste determination is conducted and approval was received prior to arriving at the landfill.



Below, process ash residuals from baking or cleaning operations. These wastes potentially contain heavy metals or <u>dioxins</u> if parts painted prior to 1982 are baked or polyvinyl chlorides (PVC) were present.







Desiccants and bicarbonates are normally classified as non-hazardous solid waste and may be disposed of into the trash in very small quantities.



PART III OTHER WASTES

PART III

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Appendix BB CIWMB Form 203: CA Comprehensive Trip Log

Appendix CC CIWMB Form 240: Unregistered Hauler & Trip Log Substitution

Appendix DD Proper Segregation of CBR Filter Elements

INTRODUCTION

Part III is designed as a guidance document to support the management and disposal of specific solid waste, which are not classified as Special Wastes, that are generated from ashore and afloat commands located in CNRSW. Wastes identified within this Part may be recyclable or be classified as both hazardous and non-hazardous wastes, depending on the components, constituents or residuals. All hazardous waste must be managed under the requirements of Part I of this Plan. Non-hazardous waste may have very specific storage and handling requirements to meet compliance standards which are identified under each specific section.

Environmental laws and regulations have increased exponentially in recent years. General solid waste management requirements are specified in the Resource Recovery and Recovery Act (RCRA), Title 40, Code of Federal Regulations (CFR), and several other very specific Federal and state environmental laws. Commands located in CNRSW are required to comply with these standards, and are inspected for compliance by the California Integrated Waste Management Board (CIWMB), and San Diego County, Department of Environmental Health (DEH). Each regulatory agency has their specific environmental oversight requirement, which is reviewed for solid waste compliance. In addition, these agencies, through enforcement actions, are authorized to issue Notices of Violation (NOV) for issues of non-compliance. If violations occur, fees or fines can by levied against the overall Navy, the specific effected command or in some cases, the individual responsible for causing the violation.

Normally, state and local regulatory agencies have more stringent environmental requirements and policies than those established by Federal law. To identify and comply with these more stringent requirements, CNRSW Hazardous Waste Program Office, through the information provided within this Part, will help your command identify and understand your responsibilities for management of the specific wastes identified within the proceeding sections.

SECTION 11 - SOLID WASTE MANAGEMENT OVERVIEW

11.1 Purpose

- a. To provide CNRSW commands and personnel with an environmental reference document to support solid waste management by defining responsibilities relating to solid waste accumulation, storage, record keeping, training and disposal issues. Additionally, this document will establish an effective waste management program for solid waste compliance for all areas under the cognizance of the Commanding Officer.
- b. The requirements specified within this Part apply only to wastes which are not specifically classified as normal trash, and which are listed within the proceeding sections.

11.2 Command Responsibilities

- a. Commands whose operations or processes generate specific solid wastes listed with this plan must comply with all Federal, state and local integrated solid waste laws or regulations.
- b. Become familiar with environmental requirements or permits and their provisions that may apply to their operations or processes, and recognize solid waste disposal requirements.
- c. Ensure all command personnel assigned to manage specific solid waste operations are aware of proper handling, and disposal procedures for the wastes being managed.
- d. Maintain, when required, at each generator location, records for item-specific laboratory analysis, copies of manifests or any other information relating to solid waste determination or disposal.
- e. Coordinate with the installation Environmental Office when necessary, when implementing new operations or processes to ensure proper compliance with applicable solid waste laws and regulations.

11.3 CNRSW Environmental Responsibilities

- a. Shall research, develop and disseminate specific solid waste instructions and guidance, serve as the primary point of contact to regulatory agencies, and provide oversight for the overall management of these waste. This includes, but is not limited to:
 - 1. Advise commands on changing environmental laws, regulations or other requirements that will effect or potentially adversely impact command specific solid waste operations or processes.
 - 2. Develop and disseminate appropriate guidance and instructions on the proper management, storage and handling of specific solid wastes.

- 3. Act as liaison to address specific questions and concerns on solid waste management issues, CNRSW policy and guidance, permits, and other issues relating solid waste management and operations.
- 4. Coordinate submittal information for required environmental reports and data calls to the appropriate regulatory agencies or naval activities.
- 5. Conduct oversight inspections for host and tenant commands relating to specific areas of environmental compliance under applicable environmental waste standards.

11.4 CNRSW Hazardous Waste Facilities

a. CNRSW owns hazardous waste facilities that consolidate, store, transfer, and/or treat hazardous waste. NAVFAC-SW contracts the operation and transport of hazardous waste to and from these facilities. To the maximum extent feasible, all wastes identified within this plan will specify the appropriate waste management, recycling or disposal facility the item may be sent for proper management.

SECTION 12 - REGULATORY AUTHORITY & REQUIREMENTS

12.1 Overview

CNRSW military and civilian personnel must be aware of the environmental laws and regulations which pertain to their specific process or operation which generate, store, treat or dispose of specific solid wastes. These requirements have been established and mandated by Federal, State or local law and are not discretionary. Cited below are the federal, state and local environmental laws or requirements that outline the major components of overall waste management program.

12.2 Resource Conservation and Recovery Act (RCRA)

A 1976 amendment to the first federal solid waste legislation, the Solid Waste Disposal Act of 1965. In RCRA, Congress established initial directives and guidelines for U.S. EPA to regulate and manage non-hazardous solid waste under Subtitle D. The law requires specific procedures to be used in transporting, storing and disposing of various wastes. RCRA also addresses and establishes duties and responsibilities of waste generators regarding the storage, treatment and disposal of all solid waste, and authorizes the EPA to issue corrective actions for violators.

12.3 Federal Facilities Compliance Act

Enacted by presidential proclamation in 1992 this law expands the enforcement authority of Federal, State and local regulators with respect to environmental management and other relevant areas of environment compliance at federal facilities. Requires the payment of fees for service, assessed in connection with regulatory inspection programs, or for the amount of waste generated at the facility. Waives government sovereign immunity, allowing regulatory agencies to issue fines and penalties for violations on issues of non-compliance.

12.4 Code of Federal Regulations (CFR)

Title 40, Code of Federal Regulations are aspects of United Stated Code and federal law which were formed from the requirements of RCRA, and several other specific environmental legislations. 40 CFR is overseen and enforced throughout the U.S. and its territories by the U.S. EPA, and by most state and local regulatory agencies. Under these regulations, come the management standards applicable for solid waste, including exclusion and exemptions from hazardous waste management requirements.

12.5 California Law

As with RCRA being federal law, the Public Resource Code (PRC), and Health and Safety Code (HSC) is state law. Within the aspects of state law, or statute, each state, has the ability to meet or exceed the standards specified by federal law. California has far more

stringent environmental requirements than addressed under federal guidelines. In addition, under the PRC, an entire classification of very specific solid waste exists, which are managed by the California Integrated Waste Management Board (CIWMB) under the title of Cal-EPA. These state specific classifications of wastes are not addressed or enforced under the previsions of RCRA, but are waste nonetheless within California, and must be managed accordingly.

12.6 Local Environmental Requirements

San Diego County, Department of Environmental (DEH) and City of San Diego, Miramar Landfill Environment Enforcement Division who is in turn regulated by permit from the Regional Water Quality Control Board under the authority of California EPA. Under these aspects city or county ordinance were enacted to manage specific wastes.

SECTION 13 - WASTE TIRE MANAGEMENT REQUIREMENTS

13.1 Overview

- a. Legislation enacted by the California State Senate, in conjunction with the <u>California Integrated Waste Management Board (CIWMB)</u> requires activities meeting the definition of Waste Tire Generators or who transport <u>waste tires</u> to comply with the provisions of California's waste tire requirements and manifest system. Check the CIWMB website for updates or further details: http://www.ciwmb.ca.gov/Tires/
- b. A waste tire generator is any activity, which produces <u>used</u> or <u>waste tires</u> or offers waste or used tires for shipment from your location. This would include locations such as: NEX Auto Service Centers removing tires from POVs, MWR Auto Hobby Shops, facility transportation activities, vehicle maintenance shops, activities maintaining Ground Support Equipment (GSE), EOD, MDU, and Seabee Detachments.

13.2 Generator Requirements

- a. Commands accumulating waste or used tires shall comply with all the following requirements, and CNRSW Regional Waste Tire Policy provided in Appendix AA:
 - Obtain a Tire Program Identification Number (TPID) from the <u>CIWMB</u> or utilize the current base tire program number. The installation Environmental Office can assist you in obtaining this number if necessary.
 - Shipments of all waste tires must be to an authorized receiving facility, utilizing a
 <u>waste tire hauler registered</u> with the <u>CIWMB</u>, or transported in government vehicles
 as specified in Section 20.3.
 - All shipments of waste tires shall be accompanied with a trip log if greater than 10 tires are shipped at one time. Read more in the following section for the specific forms if greater than 10 tires are shipped at one time.
 - It is the responsibility of the waste tire generator to obtain and provide this
 document to the registered tire hauler. However, the generator may use the
 haulers manifest if one is provided. Waste Tire Manifests and Trip Logs may be
 obtained at no cost from the CIWMB either online at http://www.ciwmb.ca.gov or by
 calling toll free 1(866) 896-0600.
- b. Waste tire generators shall submit to the <u>CIWMB</u> within 90-days of the waste tire shipment, a legible copy of each manifest. This submission may be either hard copy or if approved by the <u>CIWMB</u>, an electronic report may be submitted, provided the report meets all applicable requirements.

- c. All used or repairable tires shall be stored and stacked by size, either on pallets, floor or placed on racks that allows the inspection of each individual tire, and shall not be stored in piles or in any manner which incites pollution or creates a nuisance. The tire generator is ultimately responsible to ensure all records are maintained, and used/waste tires stored accordingly.
- d. All accumulated tires exposed to the weather shall be covered or stored in a manner which do not allow the tires to accumulate precipitation or other freestanding liquids.

13.3 Waste Tire Transportation

- a. Waste tire generators hauling tires in government owned vehicles do not need to register as waste tire haulers. However, they must comply with documentation requirements anytime they transport waste tires on a public road. Appendix BB shows the mandatory CIWMB Form 203: CA Comprehensive Trip Log and Receipts. Appendix CC shows the mandatory CIWMB Form 204: Unregistered Hauler and Comprehensive Trip Log Substitution Form.
- b. When transporting used or waste tires within the fence line of an installation, the shipment is exempt from any manifesting, log or reporting requirements.

13.4 Record Keeping

a. All waste tire generators shall maintain at their location a copy of the documentation for each shipment of waste tires containing the signature of the generator and registered hauler shall be retained on file for 3 years.

13.5 Storage Facilities

- a. Activities that store, stockpile, or accumulate 500 or more, but less than 5,000 waste tires are classified as a Minor Waste Tire Facility. Activities meeting these criteria are required to obtain a Minor Waste Tire Facility (WTF) Permit and comply with technical standards for the safe storage of waste tires, including:
 - Develop and submit to the <u>CIWMB</u> an Operations Plan, Emergency Response Plan, and other specific environmental information.

SECTION 14 - CHEMICAL, BIOLOGICAL & RADIOLOGICAL (CBR) FILTERS

14.1 Discarded or Expired Chemical, Biological & Radiological (CBR) Filter Sets

- a. Management of CBR filter sets are, for the most part, an afloat issue. However, program support via NAVSEA (change-outs) and CNRSW Environmental (proper management and disposal) are derived from shore side environmental requirements, specific to California environmental regulations.
- b. At CNRSW, CBR Filter Sets change-outs must meet specific environmental management requirements for disposal of the discarded, replaced or expired filter elements and filter set cases. Additionally, these filters are classified into two categories for proper management and disposal. <u>Appendix DD</u> shows the proper segregation of the filter elements after removal from the ship.

14.2 Segregation

a. CBR filter sets contain filter elements that are both hazardous waste and recyclable aluminum. These two filter sections must be separated during change-out to facilitate proper management.

14.2.1 Category One: Charcoal Containing Section

- a. Regardless of NSN or NAVSEA guidance, the charcoal containing section of the CBR filter set is classified as hazardous waste for the Federal regulated metal, Silver, and for California regulated heavy metals Copper, Zinc, and Molybdenum.
- b. Ships force or contractors who remove, or replace this section of the CBR Filter element must manage and dispose of this section as hazardous waste through the host command waste management and disposal procedures.
- c. Contact the NAVFAC-SW hazardous waste facility headquarters at **(619) 545-6520** for hazardous waste disposal procedures.

14.2.2 Category Two: HEPA Filter and Filter Cases

- a. The CBR filter section that contains the HEPA filter element and filter set outer cases are recyclable aluminum. This filter section and outer cases must be managed as recyclable scrap metal, under solid waste requirements, through the authorized QRP Program managed by the CNRSW Recycling Program.
- b. Category two filter elements must be separated from the charcoal containing section during removal and accumulation.

implementing the change-out of the CBR filter	ng Program at (619) 556-9331 to schedule a storage bin prior to to the CBR filter system. Filters are not authorized to be ess properly containerized or stacked on pallets and covered to ntering the environment.				

SECTION 15 - USED COOKING OIL

15.1 Overview

Used cooking oil is defined as liquefied vegetable oil, corn oil, or any other cooking oil that is liquid under ambient conditions (i.e. it does not naturally solidify at room temperature) and that is no longer useable for its intended purpose such as used deep fryer cooking oil. Used cooking oil is naturally a liquid and must be managed as such. Although under RCRA all liquids and semi-solids are classified as solid waste, aqueous and semi-solid substances and wastes are not authorized for disposal at the municipal landfill. Therefore, used cooking oil must not be disposed in solid waste or wet garbage dumpsters.

15.2 Generator Requirements

- a. Used cooking oil must be stored in open (removable) top steel or plastic leak-proof containers. The containers must not have previously held hazardous materials and must be empty prior to use. A DOT approved container is recommended but not required. The containers should be 30- or 55-gallon in size since the disposal costs are much higher for smaller containers. No residue can exist on the outside of the containers because used cooking oil putrefies quickly resulting in a bad odor.
- b. The containers must be marked with a permanent marker "Used Cooking Oil", with the command and POC name, directly on the container or using a label. Hazardous waste labels must not be used.

15.3 Turn-in Procedures

a. The least expensive method of disposal is through the FISC contractor Darling International at 1-800-870-8866 or 1-858-8600. However, the NAVFAC-SW hazardous waste service provider will also accept used cooking oil during routine and non-routine pickups based on customer requests, and will provide containers at no charge. **Refer to Part I, Appendix 6 for the current list of service locations and phone numbers.**

15.4 Spills

All used cooking oil spills must be immediately contained, cleaned and reported to the installation Environmental Office. The command causing the spill is responsible for clean-up. For piers, in instances where the spill source cannot be traced to a specific ship, the pier SOPA will be responsible for the clean-up.

SECTION 16 - USED COPIER / PRINTER TONER CARTRIDGES

16.1 Overview

Copier and printer toner cartridges come in a variety of sizes and can also be named image writers, fusers, etc.

16.2 Generator Requirements

Used cartridges must not be disposed in solid waste or wet garbage dumpsters. Used cartridges should be stored in the original manufacturer's cardboard boxes with styrofoam inserts. However, other similarly sized boxes and packing material are acceptable.

16.3 Turn-in Procedures

There are three methods of turn-in for recycling:

- a. The preferred method of turn-in is through the installation Qualified Recycling Program (QRP). Place the boxed used cartridges next to the nearest paper recycling location for the next scheduled pick-up. If boxes are unavailable, the used cartridges may be double bagged. Using the QRP is the most beneficial and cost effective method for the Navy.
- b. Another method of turn-in is directly through the manufacturer. Free, printable mailing labels are available on all manufacturers' web sites. Attach the labels to the boxes and use the applicable shipping company, e.g. UPS, FedEx, etc.
- c. Lastly, the NAVFAC-SW hazardous waste service provider will, for a charge, pick-up cartridges during routine and non-routine pick-ups based on customer requests. **Refer to Part I, Appendix 6 for the current list of service locations and phone numbers.**

PART III

APPENDICES

Appendix AA CNRSW Regional Waste Tire Policy

Appendix BB Sample Waste Tire Manifest
Appendix CC Sample Waste Tire Trip Log

Appendix DD Proper Segregation of CBR Filter Elements

CNRSW Regional Waste Tire Policy



DEPARTMENT OF THE NAVY COMMANDER NAVY REGION SOUTHWEST 937 NO. HARBOR DR. SAN DIEGO, CALIFORNIA 92132-0058

IN REPLY REFER TO: 5090 Ser N45JCB.bg/096 June 10, 2005

From: Commander, Navy Region Southwest

To: Distribution

Subj: REGIONAL WASTE AND USED TIRE MANAGEMENT POLICY

Ref: (a) State Senate Bill SB 876, (Escutia) Sept. 29, 2000

(b) California Public Resources Code, Division 20

(c) CIWMB Waste Tire Manifest System Guidance Manual, May 2003

- 1. This document establishes Commander, Navy Region Southwest policy regarding waste and used tire management and disposal in the State of California.
- 2. Reference (a) modified the California Public Resources Code, reference (b), resulting in significant changes in how waste and used tires are regulated in California. The California Integrated Waste Management Board (CIWMB) is the state agency responsible for enforcing the waste and used tire requirements. Activities meeting the definition of Waste Tire Generators, Haulers and End Use Facilities must comply with the provisions of reference (b). The CIWMB developed the Waste Tire Manifest System Guidance Manual, reference (c), to provide facilities information and technical assistance and can be obtained from the CIWMB at no cost.
- 3. A Waste Tire is a tire no longer mounted on a vehicle and is no longer suitable as a vehicle tire. A Used Tire is a tire no longer mounted on a vehicle but is still suitable as a vehicle tire. A Waste Tire Generator is any activity that generates one or more waste or used tires for shipment from your installation. This includes all locations on an installation such as NEX Auto Service Centers removing tires from privately owned vehicles, MWR Auto Hobby Shops, facility transportation activities or vehicle maintenance shops, and activities maintaining ground support equipment. This policy, and references (a) and (b) do not apply to waste and used tires removed from aircraft. Because it may be more practical, installations may choose to manage all tires, including aircraft tires, under a single program, but this does not change the non-applicability of the regulations to waste and used aircraft tires. Waste and used tires removed from aircraft are not subject to state agency oversight and enforcement.
- 4. All Installations in California under this command with Waste Tire Generators shall comply with the following requirements:
- a. Obtain a Tire Program Identification Number (TPID). The installation Environmental Office can assist you in obtaining the number.

- b. Shipments of waste and used tires must be to an authorized receiving facility utilizing a registered or certified waste tire hauler, or by using a government owned vehicle (see item 5 below). All shipments of waste and used tires, regardless of how they are shipped, shall be accompanied with a Uniform Waste & Used Tire Manifest signed by the generator and hauler. It is the generators responsibility to obtain and provide this document to the registered tire hauler. However, the generator may use the hauler's manifest if one is provided.
- c. A copy of the Uniform Waste & Used Tire Manifest for each shipment of tires must be kept on file by the generator for 3 years. Each manifest must include the signature of the generator and hauler, hauler vehicle license plate and decal numbers, log number, and phone number of the registered hauler.
- d. The generator shall submit a legible copy of each manifest to the CIWMB within 90 days of the tire shipment. This submission may be either the white copy of the manifest or if approved by the CIWMB an Electronic Data Transfer (EDT) report.
- e. Waste tires and used tires shall be stored in a manner to prevent pollution, fire hazards, and nuisance. Waste and used tires shall be stored in a manner to prevent or minimize habitat for vectors (i.e. rats, mice, mosquitoes, etc.).
- f. Used tires intended to be reused at the installation shall be stored and stacked by size on pallets, the floor, or placed on racks that allow for the inspection of each individual tire, and shall not be stored in piles or in any manner which incites pollution or creates a nuisance.
- 5. Activities hauling tires in government owned vehicles do not need to register as waste tire haulers. However, they must still comply with manifesting and Trip Log requirements anytime they transport waste tires to an end use facility or on a public road. The following requirements apply to activities hauling tires in government vehicles:
- a. Complete a Uniform Waste and Used Tire Manifest, and Trip Log for each tire shipment. The manifest and log must accompany each shipment.
- b. Uniform Waste and Used Tire Manifests containing the generators and hauler's signatures shall be submitted to CIWMB within 90 days of shipment.
- c. When transporting waste or used tires within the fence line of an installation, the shipment is exempt from any manifesting, log or reporting requirements. The only exception is when tires are transported to DRMO. Manifests and Trip Logs shall be filled out when taking tires to DRMO. DRMO is considered a separate DoD entity that is providing a service for the base.

- Subj: REGIONAL WASTE AND USED TIRE MANAGEMENT POLICY
- d. A copy of each manifest and \log must be maintained on file for 3 years.
- 6. Activities that store, stockpile, or accumulate 500 or more, but less than 5,000 waste or used tires are classified as a Minor Waste Tire Facility. Activities that store, stockpile, or accumulate 5,000 or more waste or used tires are classified as a Major Waste Tire Facility. Activities meeting these criteria shall comply with the following requirements:
- a. Obtain either a Major or Minor Waste Tire Facility Permit and comply with technical standards for the safe storage of waste and used tires.
- b. Develop and submit to the CIWMB an Operations Plan and Emergency Response Plan.
- 7. Contact your respective Installation Environmental Office for additional information regarding the best method and proper procedures for the management and disposal of waste and used tires.
- 8. Installation Environmental Offices are responsible for maintaining compliance oversight on the waste tire generators and shall provide the following services:
- a. Provide training and information on state of California waste and used tire requirements.
- b. Conduct periodic inspections on waste tire generators to determine compliance with applicable requirements.
- c. Provide assistance to waste tire generators in manifest completion.
- d. Assist the waste tire generator in identifying authorized waste tire haulers registered or certified with the CIWMB.

Program Director Environment

Distribution:

NAVAL BASE POINT LOMA

NAVAL BASE SAN DIEGO

NAVAL BASE CORONADO

NAVAL BASE VENTURA COUNTY

NAVAL WEAPONS STATION, SEAL BEACH

NAVAL AIR STATION, LEMOORE

NAVAL AIR FACILITY, E CENTRO

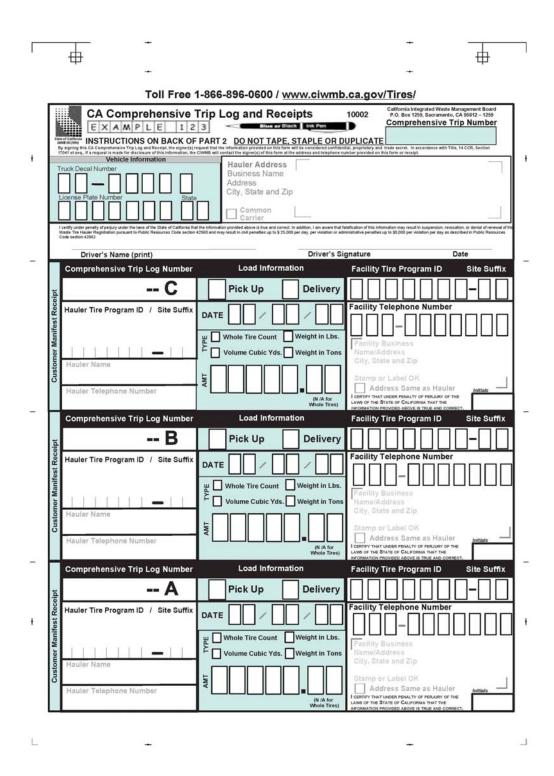
NAVAL AIR WEAPONS STATION, CHINA LAKE

NAVAL SURFACE WARFARE CENTER, CORONA

NAVAL POSTGRADUATE SCHOOL, MONTEREY

NAVAL AIR STATION, FALLON

CIWMB Form 203



CIWMB Form 204

Name and Address		ed Hauler & Comprehens	Ve 1 rip Log	Substitution	Torm
Date & Name	License Plate & Decal Number (if applicable)	Hauler's Name/Address/Signature	Quantity & Type of Tires	Pick up/Delivery Status	Unregistered Tire Hauler or Exemption Status (if applicable)
/ / Name of Reporting Party	(License Plate) (State)	(State Ness)	Quantity of Tires: Type of Load: Whole Cubic Yards Pounds Tons	Check One:	Unregistered Tire husler OF Exemption (if applicable): LEA Exempt Government Commercial Carrier Agricultural Or
, ,	(License Plate) (State)		Quantity of Tires: Type of Lead: Whole Cubic Yards Pounds Tons	Check One:	No Manifest/CTL form Unregistered Tire haule OF Exemption (if applicable): LEA Exempt Government Commercial Carrier Agricultural
Name of Reporting Party // Name of Reporting Party	Decal number (if equintle) (License Plate) (State) Decal number		Quantity of Tires: - Type of Lond: Whole - Cubic Yards: Pounds: Tons	Check One:	Or O
/ / Name of Reporting Party	(License Plate) (State) Decal number (displicable)		Quantity of Tires: Type of Load: Whole Cubic Yards Pounds Tons	Check One:	No Manifest/CTL form Unregistered Tire hauder Of Exemption (if applicable): LEA Exempt Government Commercial Carrier Agricultural Or No Manifest/CTL form

State of California CIWMB 204 (Rev. 01/07) California Integrated Waste

or fax to (916) 319-7605

The Unregistered Hauler and Comprehensive Trip Log Substitution Form or the CIWMB 204 form is used for the following purposes:

- 1) To report an unregistered hauler who delivers waste tires to a location. The generator or end use facility shall submit the report on an unregistered hauler within 30 days to the Board.
- 2) In the place of a Comprehensive Trip Log if a registered hauler fails to provide a completed Comprehensive Trip Log receipt when waste or used tires are removed from the generator's location. The generator shall complete a Unregistered Hauler & Comprehensive Trip Log Substitution Form CTWMB 204 within 48 hours of the tire removal and submit the form to the CTWMB within 90 days.
- 3) If waste or used tires are received by an end-use facility from a registered hauler who does not have a Comprehensive Trip Log. The end use facility shall complete the CIWMB 204 within 48 hours of the tire delivery and submit the form to the CIWMB within 90 days. The end-use facility shall complete this form and submit to the Board within 30 days of the acceptance of 10 or more waste or used tires from a person who is not registered as a waste tire hauler unless that person has written authorization by the Local Enforcement Agency for purposes of an Amnesty Day Event or a One Time Exemption and is transporting no more than 20 waste or used tires to the end-use facility.
- 4) If the person is hauling 20 or more waste or used tires under the written authorization of a Local Enforcement Agency for purposes of an Amnesty Day Event or a One Time Exemption, the end-use facility shall report this information on the CIWMB 204 and submit the form to the Board within 30 days of the acceptance of waste or used tires from that person.

Complete the Unregistered Hauler and Comprehensive Trip Log Substitution Form using the following instructions.

- 1. Print your name and address of facility in the box provided in the top center portion of the form
- 2 Print your facility's seven digit Tire Program Identification Number (TPID) in the boxes provided on the top right portion of the form.
- 3. In the left column write the date when the delivery/pick-up occurred. Provide your name below the date
- 4. In the next column, write the hauler's license plate, the state where the license plate was issued, and the hauler's CIWMB decal number (if registered) found on the lower right-hand inside corner of front windshield.
- 5. In the next column, write the hauler's name and address including city, state and zip code. Also, provide their signature.
- 6. In the column titled "quantity and type of tires" write the number of tires that were delivered or picked up. Check only one box to show the type of waste tire load.
- 7. In the pick up/delivery status column check only one box to indicate whether tires were picked up or delivered.
- 8. In the last box place a check to show whether the hauler is unregistered, exempt, or does not possess a Comprehensive Trip Log to document the pickup or delivery.

SUBMIT FORM TO: CIWMB HAULER & MANIFEST PROGRAM

P.O. BOX 4025 SACRAMENTO, CA 95812 OR FAX: (916) 319-7605



Figure 21.1 identifies the size difference between the Category One (center ground) and Category Two filters elements & filter cases prior to replacement.





Figure 21.2 shows the segregation into a roll-off of Category Two filter elements, (filters cases and the HEPA filters).

Figure 21.3 shows the segregation of the larger Category One, activated charcoal filter.