CDP Medical Support Services

Attachment 15

CDP Waste Management Plan

Organization: Center for Domestic Preparedness **Date: (April 29, 2016)**
Title: Waste Management Plan

I. Purpose

To establish procedures that ensure all waste is properly characterized to facilitate compliant management In Accordance With (IAW) all applicable requirements and to encourage sustainable waste management practices.

II. Supersession

This document supersedes CDP Directive 066-6-00 CDP Medical Bio-Hazard Waste Plan and CDP Directive 635-1-00 CDP Solid Waste Reduction and Recycling (12 Sep 2012).

III. Authority

Center for Domestic Preparedness (CDP) Environmental and Sustainability Management System (ESMS) Program Manual

IV. References

A. 40 CFR Chapter I, Subchapter I – Solid Wastes

B. 40 CFR Chapter I, Subchapter R – Toxic Substances Control Act

C. ADEM Admin Code 335-13-x-.xx Land Division - Solid Waste Program

D. ADEM Admin Code 335-14-x-.xx Land Division - Hazardous Waste Program

E. ADEM Admin Code 335-17-x-.xx Land Division – Medical Waste Program

F. Center for Center for Domestic Preparedness (CDP) Chemical, Ordnance, Biological, and Radiological Training Facility (COBRATF) Safety Plan, CDP-OP-5001.4, Annex A - Bloodborne Pathogens Plan (BPP)

G. 29 Code of Federal Regulations (CFR) 1910.1030 – Bloodborne Pathogens

V. Definitions

A. ADEM – Alabama Department of Environmental Management

B. Definitions contained in ADEM Admin. Code 335-17-1-.02 and 29 CFR 1910.1030 are adopted verbatim by reference with the following clarifications.

C. Energy Recovery. Energy recovery from waste is the conversion of non-recyclable waste materials into useable heat, electricity, or fuel through a variety of processes,

including combustion, gasification, pyrolization, anaerobic digestion, and Landfill Gas (LFG) recovery. This process is often called Waste-To-Energy (WTE).

D. EPA – Environmental Protection Agency

E. Medical or biohazardous waste. Any solid waste which during either its generation or other handling would be regulated as a potentially infectious material under the Occupational Safety and Health Administration (OSHA) BPP standard or as medical waste under ADEM Admin. Code 335-17.x.xx.

F. On-Site. ADEM Admin. Code 335-17-1-.02 (33) defines "On-site" as "the same or geographically contiguous property which may be divided by public or private right-of-way. Non-contiguous properties owned by the same person or entity connected by a right-of-way which he controls and to which the public does not have access, is also considered on-site." The CDP campus areas at the former Fort McClellan are non-contiguous, however due to limited traffic in the area between CDP properties (primarily Army and National Guard) medical / biohazardous waste is managed using the ADEM "On-site" requirements.

G. Recycling / Composting. Recycling is a series of activities that includes the collection of used, reused, or unused items that would otherwise be considered waste; sorting and processing the recyclable products into raw materials; and remanufacturing the recycled raw materials into new products.

H. Resource Conservation and Recovery Act (RCRA). Regulates both non-hazardous and hazardous solid waste.

I. Source Reduction and Reuse. Source reduction, also known as waste prevention, means reducing waste at the source. It can take many different forms, including reusing or donating items, buying in bulk, reducing packaging, redesigning products, and reducing toxicity.

J. Toxic Substances Control Act (TSCA). Regulates certain hazardous substances to include polychlorinated biphenyls (PCB), asbestos, and lead-based paint (LBP)

K. Training Moulage Waste. Non-biohazardous waste generated during training activities. This solid waste consists of various moulage items which visually may appear to be biohazardous (e.g. contaminated dressings, etc.), but in reality contain no biohazardous materials and do not present an infectious hazards. They may present a chemical hazard consistent with the Safety Data Sheet (SDS) for that moulage material. Sharps used in training – even though never contaminated with biological material – are NOT training wastes and are considered as biohazardous.

L. Treatment and Disposal. Treatment can take many forms such as incineration, chemical neutralization / precipitation, air sparging, etc. Landfills are the most common form of waste disposal and are an important component of an integrated waste management system.

VI. Responsibilities

A. CDP Environmental Coordinator / Sustainability Point of Contact

1. Serve as the proponent for overall management and support of this Plan.
2. Maintain this plan in compliance with the current version of the listed references.
3. Conduct periodic reviews of operations which generate, collect, store, treat, and dispose of solid waste to verify that this plan is being complied with by all personnel.
4. Facilitate standardization of any contractor internal operating procedures for compliance with this plan.

B. CDP Industrial Hygienist

1. Prepare the Hazard Assessment (HA) for COBRATF hazardous waste Standard Operating Procedures (SOPs) to identify the required Personal Protective Equipment (PPE) for each step.
2. Review the HA of other plans and SOPs related to the generation and management of waste.
3. Review the HA of other SOPs related to the management of medical/bio-hazard waste.

C. CDP Federal Occupational Health Nurse (FOHN)

1. Serve as the responsible person for the overall management and support of the COBRATF BPP.
2. Consult with other responsible parties in the development of bloodborne pathogens related plans and SOP.

D. The Quality Assurance (QA) Office will ensure that all federal employees and contractors are furnished this directive.

E. Bio-Hazard waste generator, collector, storer (medical personnel, blood and bio-laboratory personnel, emergency medical personnel, custodial staff, etc.).

1. Follow the task specific SOP during any activity generating bio-hazard waste.
2. Subsequent to generation, manage the bio-hazard waste in compliance with this plan and any associated SOPs.
3. Properly label each bio-hazard waste container.
4. Perform generator / collection duties IAW ADEM Admin. Code 335-17-2 thru 335-17-4.

F. Bio-Hazard waste transporter (e.g. medical staff via CDP ambulance)

1. Check all bio-hazard waste containers prior to transport for damage/leakage and proper labeling.
2. Secure and transport all bio-hazard waste IAW applicable portions of ADEM Admin. Code 335-17-5.

G. COBRATF Treatment (Incinerator / Autoclave) Staff

1. Prior to treatment (incineration / autoclaving), store all solid waste IAW applicable standards.
2. Prior to treatment, store all bio-hazard waste IAW ADEM Admin. Code 335-17-4.
3. Do not incinerate / autoclave any solid waste unless that waste stream has been characterized IAW this document, and you have a copy of the waste characterization form on hand for that waste stream and the waste has been approved for on-site incineration / autoclaving.
4. Treat all bio-hazard waste IAW ADEM Admin. Code 335-17-6.
5. Dispose of bio-hazard waste IAW ADEM Admin. Code 335-17-7.

H. All CDP departments and contractors who generate, store, transport, treat, or dispose of waste.

1. Follow the task specific SOP during any activity generating waste.
2. Ideally prior to generation but definitely subsequent to generation, characterize all waste using the material classification flowchart (Annex A).
3. Prepare a CDP Waste Profile Form for each waste stream and route through COR to Environmental Office for review and approval.
4. Properly label and manage each waste IAW all applicable federal, state, and local regulations and internal Department of Homeland Security (DHS), Federal Emergency Management Agency (FEMA), and CDP Waste Profile Form requirements.
5. Prior to the start of any new process (and periodically for existing waste streams), evaluate the process to implement the sustainable materials management / waste management hierarchy outlined below.

VII. Standard Operating Procedures

A. Sustainable Materials Management

1. No single waste management approach is suitable for managing all waste streams in all circumstances. However, the hierarchy shown in Figure 1 below ranks the most environmentally sound strategies for sustainable materials management. To the extent possible, CDP encourages all organizations and contractors to apply this hierarchy to their operation. Purchasing green products that support reuse and recycling is highly encouraged. The CDP has established goals and objectives related to sustainability that utilizes this hierarchy in support of Executive Orders and DHS / FEMA sustainability policies and directives.

Figure 1. Sustainable Materials / Waste Management Hierarchy

2. Based on this review consider amending the operation to improve sustainability when practicable. Consider both the short and long term cost of waste generation and handling in this evaluation.

B. Overview of Waste Regulations

Nearly everything we do leaves behind some kind of waste. Households create ordinary garbage while industrial and manufacturing processes create solid and hazardous waste. The Environmental Protection Agency (EPA) regulates all waste under the Resource Conservation and Recovery Act (RCRA). In Alabama, ADEM was granted authority to administer the RCRA program and has promulgated state standards which essentially mirror the federal statutes (See ADEM Admin Codes).

1. EPA defines solid waste as any garbage or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities. Solid waste can be generally divided into two categories – hazardous waste and non-hazardous waste.

2. Non-hazardous solid waste can be divided into two main types.

   a. Municipal solid waste – more commonly known as trash or garbage – consists of everyday items we use and then throw away such as product packaging, grass clippings, clothing, bottles, food scraps, newspapers, etc.

   b. Industrial waste is made up of a wide variety of non-hazardous materials that result from the production of goods and products or other commercial and institutional operations. Two primary types of industrial waste are:

      (1) Construction and Demolition (C&D) materials. C&D materials are generated during the construction, renovation, and demolition of buildings, roads, etc. and often contain concrete, wood, asphalt, gypsum metals, bricks, trees, stumps, earth, and rock; and

(2) Medical waste is generated from activities associated with diagnosis, treatment or immunization of people or animals. It may include blood-soaked bandages, discarded needles, etc. Although there are no federal standards, ADEM has promulgated specific regulated medical waste regulations.

3. Hazardous waste. Hazardous waste is waste that is dangerous or potentially harmful to our health or the environment. Hazardous wastes can be liquids, solids, gases, or sludges. Hazardous waste can be divided into the following types:

   a. Wastes may be hazardous because they are listed on one of the four EPA lists. The lists include the F-list (wastes from common manufacturing and industrial processes), K-list (wastes from specific industries), and P- and U-lists (wastes from commercial chemical products).

   b. Wastes that do not meet any of the listings above but that exhibit ignitability, corrosivity, reactivity, or toxicity are consider "Characteristic" hazardous wastes.

   c. Universal wastes to included batteries, pesticides, mercury-containing equipment, and bulbs (lamps) have been placed in a special category to streamline their management.

      (1) Batteries. Any battery that is considered a hazardous waste must be managed as a universal waste or as a hazardous waste. Typical hazardous waste batteries include discarded primary (non-rechargeable) and secondary (rechargeable) batteries that contain cadmium (e.g., Ni-Cad batteries), lead (e.g. sealed lead acid), or mercury (mercury-oxide). Other types of batteries must be managed as universal waste (or hazardous waste) only if they exhibit a hazardous waste characteristic.

      Most commonly generated waste batteries; such as dry cell zinc-carbon, silver oxide, and post 1993 alkaline (long-life) batteries, do NOT contain appreciable amounts of the hazardous elements of concern, and hence would NOT be required to be managed as universal waste. However, in the interest of diverting these items from less desirable disposal destinies (e.g. incineration or landfills); CDP encourages the recycling of all batteries.

      (2) Pesticides. Various pesticides that have been recalled or banned from use, are obsolete, have become damaged or are no longer needed are considered universal wastes.

      (3) Mercury-containing equipment includes any product or component that contains elemental mercury such as thermometers, thermostats,

barometers, certain electrical switches and relays, thermocouples, manometers, and sphygmomanometers.

(4) Bulbs (lamps). Examples of this category includes fluorescent lamps, neon lamps, High Intensity Discharge (HID) lamps (including mercury vapor, metal halide, and high pressure sodium lamps).

4. Toxic Substances Control Act (TSCA)

The TSCA is administered by the EPA and addresses specific chemicals including Polychlorinated Biphenyls (PCBs), asbestos, radon, and lead-based paint.

a. PCBs. PCBs belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons. PCBs were domestically manufactured from 1929 until their manufacture was banned in 1979. They have a range of toxicity and vary in consistency from thin, light-colored liquids to yellow or black waxy solids. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications. They are most likely found at CDP in old fluorescent light ballasts. As part of the Army's environmental programs and the closure of Ft. McClellan most transformers and capacitors containing PCBs were removed prior to CDP obtaining its current properties.

b. Asbestos. Asbestos is a mineral fiber that occurs in rock and soil. It was used in a variety of building construction materials to include insulation materials, roof shingles, floor tiles and mastic. At CDP it is also found inside certain doors. As part of the closure of Ft. McClellan surveys were completed to identify areas containing asbestos. Disturbing asbestos can result in it becoming airborne.

c. Lead-Based Paint. Lead is a naturally occurring element found in soil. It can be toxic to humans and animals, especially children. At CDP the primary concern is paint used in some of the older buildings. Similar to PCBs and asbestos, as part of the closure of Ft. McClellan surveys were completed to identify areas containing lead-based paint.

C. Characterization of Waste Materials

1. PCBs, asbestos, and lead-based paint present unique hazards and have specific requirements related to removal, storage, treatment, and disposal. Handling or contact with these items is most likely to occur during Operations and Maintenance (O&M) activities or construction projects. CDP has included language in O&M contractor performance work statements and construction contracts to inform these workers of the potential presence of these materials and require coordination with CDP facilities, safety, and industrial hygiene prior to any disturbance.

2. Waste Characterization

   All CDP staff and Contractors must be aware of the regulatory status of wastes to insure compliant and environmentally responsible handling and disposal. To insure this occurs the following actions are required:

   a. All wastes must be properly classified using a combination of generating process knowledge, chemical Safety Data Sheets (SDS), or analytical data.

      (1) When process knowledge alone is used it must be based on a thorough understanding of the generating process and the process must result in a consistent waste stream.

      (2) Analytical data must be based on a sufficient number of representative samples of the waste stream.

      (3) Depending on the consistency of the waste streams recurrent samples may be required up to including samples of each batch of waste.

   b. The results of this characterization shall be documented using the CDP Waste Profile Form. One form must be completed for each waste stream.

      NOTE: Due to the nature of CDP operations some generic waste profile forms have been prepared such as one for MSW – office waste. Departments or contractors may utilize one of these generic waste profiles via a written request to the Environmental Office, if they agree to comply with the requirements listed on that profile form.

3. The CDP department or contractor shall route the waste profile form through the Assistant Director or COR for review, prior to Environmental Office review.

4. The Environmental Office shall review each waste profile form for completeness, determine the proper regulatory requirements, assign a waste profile number, and notify the submitting department or contractor of the required storage, treatment, or disposal requirements.

5. The Environmental Office will maintain a master list of all waste profiles.

D. Medical and Biohazardous Waste Management

1. Points of Contact

   a. All internal and external inquiries regarding management of medical / biohazardous waste (to include generation, collection, storage, transportation, or treatment) will be referred to the CDP Environmental Coordinator, CDP Safety and Occupational Health Manager, or the CDP Industrial Hygienist.

   b. Address: Federal Emergency Management Agency (FEMA), Center for Domestic Preparedness, 61 Responder Drive, Anniston AL 36205.

   c. Phone: 256-847-2266/2472.

2. Generation

   a. FEMA CDP currently generates less than 220 pounds (100 kilograms) of medical / biohazardous waste per month.

      (1) If during any calendar month the total quantity generated (as recorded at the COBRATF storage area) exceeds 220 pounds, the COBRATF Operations and Maintenance contractor shall immediately notify the CDP Environmental Coordinator, CDP Safety and Occupational Health Manager, and the CDP Industrial Hygienist.

      (2) This plan and all associated SOPs will immediately be reviewed at that time for any additional administrative, permitting, or operational requirements under ADEM Admin. Code 335-17.x.xx.

      (3) As required, a revised medical / biohazardous waste management plan will be submitted to ADEM.

   b. Medical / biohazardous waste is generated at multiple locations on the CDP campus to include:

      (1) Main Complex, 61 Responder Drive, Anniston AL 36205

      (2) Chemical, Ordnance, Biological, Radiological Training Facility (COBRATF), 801 Walt Phillips Road, Anniston, AL 36205

      (3) Noble Training Facility (NTF), 490 Care Drive, Anniston, AL 36205

      (4) 900 Area Housing, 21 Straub Circle, Anniston, AL 36205

      (5) Other training areas located on FEMA CDP owned or leased property within the former Ft McClellan Army Post.

   c. Wastes generated at one or more of these locations includes but is not limited to:

      (1) Blood and blood components associated with phlebotomy and laboratory operations.

      (2) Sharps (needles, IV sets, pipettes, etc.) associated with phlebotomy, drug injections and intravenous activities.

      (3) Miscellaneous blood / biohazard contaminated items from:

         (a) Routine and emergency medical treatment (e.g. gloves and other PPE, gauze, disposable medical products, etc.)
         (b) Laboratory operations (e.g., test tubes, blood tubes, applicator sticks, PPE, etc.)
         (c) Cleanup of biohazardous materials (contaminated absorbent materials, PPE, etc.)

3. Segregation, packaging, and labeling

   a. At the point of generation, all medical / biohazardous waste will be segregated from other solid / hazardous waste and packaged in approved containers for the type of waste generated as follows:

(1) Sharps – all sharps, to include but not limited to needles, syringes, pipettes, etc., will be placed in biohazard sharps containers.

(2) Other solid medical / biohazardous waste – all gauze, PPE, contaminated absorbent materials, etc. not presenting a sharps hazard will be placed in "Red Bags".

(3) Liquid medical / biohazardous waste – all liquid medical / biohazardous waste (e.g., plasma from Red Blood Cell (RBC) Cholinesterase phlebotomy / laboratory operations) will be placed in approved glass / plastic containers prior to being treated for disposal.

b. Training moulage waste (with the exception of sharps) are not biohazardous waste. In order to avoid incorrect identification of these wastes as biohazardous they will be placed in designated waste receptacles lined with gray plastic liners and labeled: "Training Moulage Waste – Non-Biohazardous."

c. All containers holding medical / biohazardous waste will be properly labeled to include:

(1) International Biological Hazard Symbol and / or the words "Infectious," "Medical Waste," or "Biohazardous."

(2) Facility name and address (e.g. FEMA CDP, 61 Responder Drive, Anniston, AL 36205).

(3) Date the waste was packaged.

(4) Filled package weight (in pounds).

d. If medical / biohazardous waste is over packed, the outermost container will contain this same information.

e. All containers will be properly sealed prior to transportation.

4. Transportation

a. All medical / biohazardous waste generated at any CDP facility or training location will be transported by the medical services contractor to the COBRATF medical / biohazardous waste storage location for holding prior to treatment by incineration or sterilization. No other location is currently authorized for waste storage.

b. Transportation of full containers from the fixed points of generation to the COBRATF storage area will be conducted routinely (weekly). If additional transports are required, this movement will be coordinated between the generating location and the medical services contractor.

c. Transportation of all medical / biohazardous waste shall be via one of the CDP ambulances operated by paramedics from the medical services contractor.

d. Because FEMA CDP generates less than 220 pounds (100 kilograms) of medical / biohazardous waste per month and transports our own waste, we are

exempt from the ADEM transporter requirements. No medical transport vehicle shall transport 220 pounds or more of medical / biohazardous waste in a 30 day period.

5. Storage

   a. Until the individual medical / biohazardous waste container is filled at the point of generation it will be routinely inspected for damage or leakage and will be secured against theft or access by unauthorized persons. All generation locations are manned by paramedics or laboratory personnel. When generation locations are not manned, the room containing the medical / biohazardous waste container(s) is locked.

   b. Any container found to be damaged or leaking will be over packed and the area decontaminated IAW applicable SOPs / work instructions.

   c. Due to the quantity of medical/biohazardous waste generated (<220 pounds / month) at CDP, refrigerated storage after seven days is not currently required.

   d. If more than one of each type of container (e.g., burn box, red bag, etc.) is generated prior to the weekly pickup, additional transports are encouraged.

   e. Once the container is sealed and labeled by the generator it is not opened by other personnel. It may be over packed if leaking or damaged or to facilitate transport / storage. All outer packaging will be labeled IAW VI.C.2 above.

   f. Storage of all untreated medical / biohazardous waste after generation will be stored at the COBRATF Medical Waste Storage Area.

6. On-site / Off-site Treatment

   a. No untreated medical / biohazardous waste is transported off-site (outside the control of CDP) for treatment. All waste is transported, stored, and treated by CDP personnel.

   b. Treatment at point of generation.

      (1) Blood / plasma liquid medical waste associated with RBC Cholinesterase will be treated IAW SOP using 5% bleach solution. After required contact period, the treated liquid waste will be disposed of via the sanitary sewer to the Publically Owned Treatment Works (POTW).

      (2) Liquid biohazardous waste (laboratory operations) at the COBRATF will be treated IAW SOP using 5% bleach solution. After required contact period, the treated liquid waste will be disposed of via the sanitary sewer to the POTW.

      (3) Liquid biohazardous waste generated inside the COBRATF Agent Training Bays will be initially treated IAW COBRATF SOPs related to agent contaminated materials then as noted in VI.G above.

c. Treatment away from the point of generation

(1) All medical / biohazardous waste is treated at the COBRATF operations and maintenance facilities by either steam sterilization or incineration prior to disposal.

(2) No medical / biohazardous waste from activities other than CDP locations listed in this plan will be treated by CDP.

(3) Incineration.

(a) The CDP incinerator (ADEM Permit No. 310-0070-X001) will be used to treat untreated medical / biohazardous waste IAW ADEM Admin. Code 335-17-6-.01(1) and also to further process waste previously treated by steam sterilization IAW Admin. Code 335-17-6-.01(2)(b).

(b) Ash residues from the incineration process shall be stored and disposed of IAW ADEM Admin. Code 335-17-4-.02.

(c) Characterization of waste residue.

(i) If the waste is further treated (e.g. by incineration of sterilized biohazard waste), analyze the ash for applicable Environmental Protection Agency (EPA) waste codes (e.g. Toxicity Characteristic Leaching Procedure (TLCP) for heavy metals).

(ii) If the residue does contain EPA waste codes, waste will be handled IAW applicable EPA and ADEM requirements.

(4) Steam Sterilization.

(a) Steam sterilization of medical / biohazardous waste will be performed consistent with the parameters outlined in ADEM Admin. Code 335-17-6.01((2)(d).

(b) All wastes treated by steam sterilization will be further processed by incineration to remove biohazard waste markings / label and (if required) to meet the requirements of Admin. Code 335-17-6-.01(2)(b).

7. Training

a. All personnel who generate, collect, store, transport or treat medical / biohazardous waste will be trained IAW the CDP COBRATF BBP.

b. All personnel will be further trained in applicable sections of this plan and associated permit(s).

c. Individual CDP contractors will be responsible for training their personnel on the contents of this plan and associated SOPs. The CDP COBRATF Biosafety Officer (BSO)will serve as the technical resource.

d. All training records related to this plan, associated SOPs, and the CDP COBRATF BBP will be retained for five years post-employment.

8. Notifications

a. COBRATF operations and maintenance contractor will notify the CDP Environmental Coordinator, CDP Safety and Occupational Health Manager, and CDP Industrial Hygienist / COBRATF Biosafety Officer if the quantity of waste generated is 220 pounds or greater per month.

b. Medical Support Services contractor will notify the CDP Environmental Coordinator, CDP Safety and Occupational Health Manager, and CDP Industrial Hygienist / COBRATF Biosafety Officer if the quantity of waste transported by any one medical waste transport vehicle (i.e. ambulance) is 220 pounds or greater per month.

c. ADEM will be notified should CDP waste generation exceed 220 pounds in a month or a revision to this plan be required.

E. Sustainable Waste Management

1. The CDP is committed to be a good steward of the environment. A key element of that stewardship is to effectively execute a Solid Waste Reduction and Recycling Program for the CDP facilities located throughout the campus. The CDP will integrate the principles of waste reduction and recycling into all phases of daily activities and operations within the CDP. The CDP is instituting a basic six (6) material recycling program at 61 Responder Drive, the Noble Training Facility (NTF), 40 Twill Lane, the Advanced Responder Training Complex (ARTC), the Lodging Complex, and the Chemical, Ordnance, Biological, Radiological Training Facility (COBRATF).

2. Definitions

a. Source Reduction: Waste prevention, or source reduction, means consuming and throwing away less. Source reduction actually prevents the generation of waste in the first place, so it is the most preferred method of waste management and goes a long way towards protecting the environment.

b. Recycle: Recycling turns materials that would otherwise become waste into valuable resources. In addition, it generates a host of environmental, financial, and social benefits. Materials like paper, metal, plastics, and aluminum cans are collected, separated, and sent to facilities that can process them into new materials or products. Separating identified recyclable materials and placing them in appropriate recycling containers is good business practice, and it is mandatory.

3. Methods to Achieve Solid Waste Reduction

    a. A. Source Reduction: CDP federal employees and contractors are responsible for implementing operational practices that prevent waste from being produced. Examples include printing reports and documents on both sides of the paper; printing appropriate numbers of documents; using email rather than printed correspondence; and using products that are reusable, refillable, repairable, nontoxic, and recyclable.

    b. Reuse of Materials: All CDP federal employees and contractors are responsible for reusing products whenever possible.

4. Recycling

    a. All CDP Federal employees, contractors, and students are responsible for separating identified recyclable materials such as cardboard, aluminum cans, plastic containers, scrap metal, and used toner cartridges, and placing them in the appropriate recycling container.

    b. Recycling containers will be provided by the Facility Operations and Support Services (FOSS) or Facility Operations and Maintenance Services (FOMS) contractors at the locations listed in the CDP Recycling Bin file on the CDP Common Drive, CDP Environmental folder (these include common and general areas in each of the CDP facilities). The contractors' designated custodial/maintenance staff will be trained in the disposal of our recyclables consistent with a single-stream methodology. The FOSS / FOMS Program Managers will monitor performance and report deficiencies to the FOSS Contracting Officer's Representative (COR) for resolution. Members of the FOSS / FOMS contractor staff will place the appropriate recycling containers (labeled) throughout their assigned areas of responsibility in support of this program. These containers will not be placed in egress paths. Any/all profit realized through the recycling effort by FOSS / FOMS contractors will be deducted from their monthly invoicing of the Government. The FOSS / FOMS Program Manager will report the quantity of waste recycled (by type) quarterly thru the COR to the Environmental Office.

    c. Recycled wastes – the following items will be recycled as indicated:

        (1) Plastic containers and aluminum cans. Appropriately sized recycling receptacles clearly marked "Aluminum Cans Only" and "Plastic Containers Only" will be placed in general strategic areas throughout these facilities and will be serviced on a daily basis by the designated FOSS / FOMS custodial personnel.

        (2) Cardboard: The person disposing of cardboard will mark it as "TRASH" and place it in the hallway outside their respective office.

The designated FOSS / FOMS custodial personnel will pick up this recyclable cardboard refuse as it is discovered, break it down, and transport it to the designated area in each of their respective areas of responsibility.

(3) Used Toner Cartridges: Used Toner Cartridges will be turned in to the CDP Asset Management Office, 61 Responder Drive.

(4) Recycled metals. All recyclable discarded metal will be stored at the responsible FOSS / FOMS maintenance facility to await transport to the appropriate agency.

(5) Universal Waste. Universal waste includes batteries and fluorescent bulbs which can be recycled.

(a) Fluorescent bulbs. All fluorescent bulbs should be removed in an intact form by the responsible FOSS / FOMS contractor staff. They should then be transported to the designated universal waste storage area at Building 40 where they will be managed by the FOSS Contractor. They may either be recycled (preferred method) or crushed for disposal.

(b) Batteries. To the extent practicable, rechargeable batteries should be purchased. At the end of their useful life, they should be collected and transported to the designated universal waste storage area at Building 40, by the contractor expending the batteries, where they will be managed by the FOSS Contractor. In the case of computer Universal Power Supplies (UPS) or Alternate Power Supplies (APS) these will be turned in to the CDP Asset Management Office, 61 Responder Drive.

(6) Petroleum and Animal / Vegetable Oils.

(a) Petroleum Oil (Oil and Grease). Used oil generated from vehicle and equipment maintenance should be stored, managed, and disposed of IAW the ADEM used oil standards. The generating contractor shall prepare a waste profile indicating where their used oil will be sent for recycling.

(b) Animal / Vegetable Oil (Cooking oil). Cooking oil shall be recycled to the extent practicable. The generating contractor shall prepare a waste profile indicating where their used oil will be sent for recycling.

VIII. Forms Prescribed

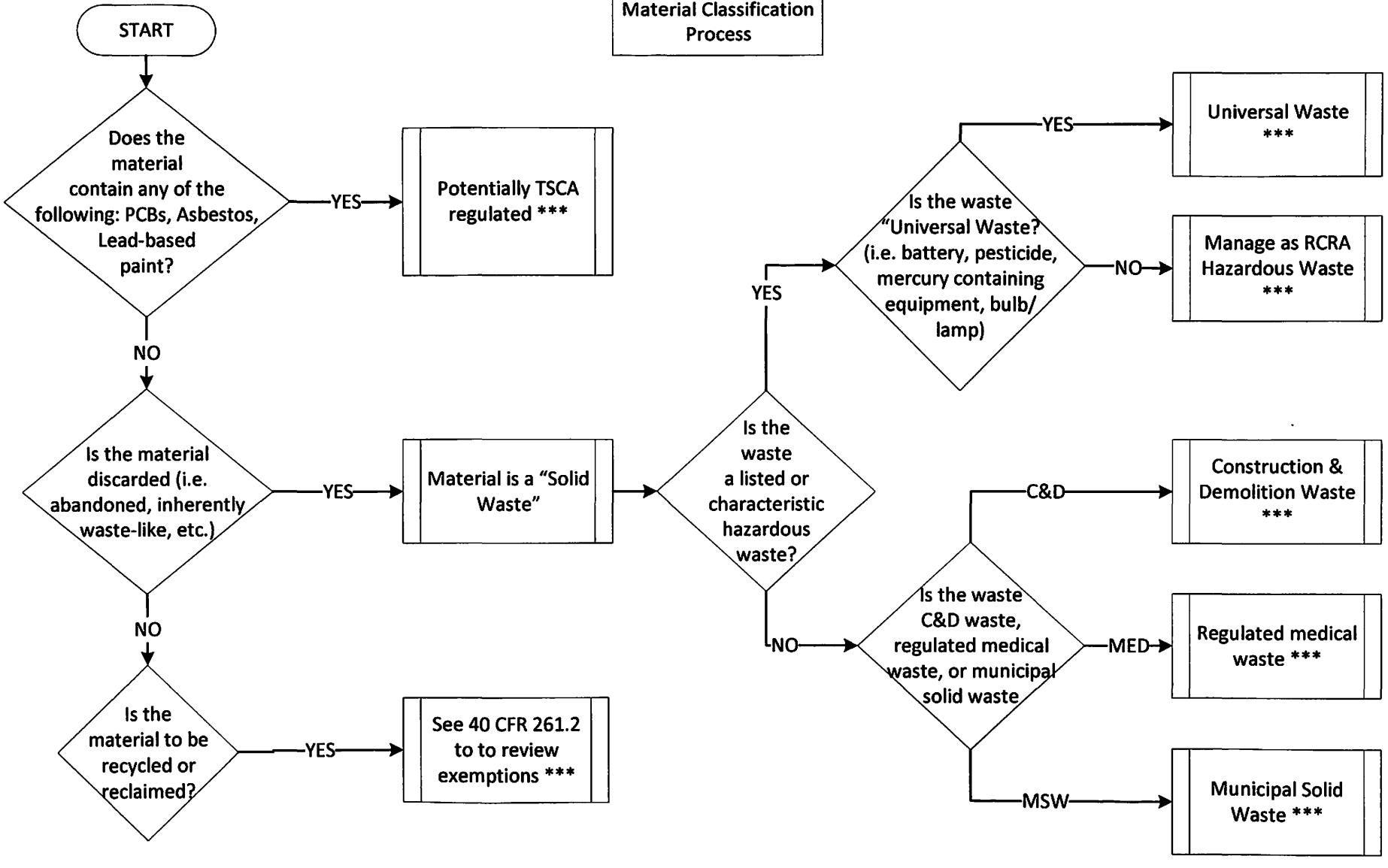
A. CDP Waste Profile Form

APPROVED BY:

Charles M. King
Superintendent
Center for Domestic Preparedness

4/29/2016
Date

Material Classification Process



NOTES:
A CDP approved waste profile is required for all TSCA regulated waste, RCRA Solid Waste (Haz & Non-Haz), and recycled / reclaimed materials

*** - consult Environmental Office for detailed compliance requirements.

FEMA Center for Domestic Preparedness - Waste Profile Form

Part A. Generator Information	
1. Generators Name:	Waste Profile No.
2. Point(s) of Generation:	
3. Point of Contact / Title	5. POC Phone
6. Contracting Officer Representative (COR)	7. COR Phone

Part B. Waste Information

(Note: Attached supporting data if applicable – e.g. safety data sheet, analytical, etc.)

1. Name of Waste:

2. Process Generating Waste:

3. Projected Waste Quantity (lbs) One-time: Per year if recurrent:

5. Is this waste restricted from land disposal? (40 CFR 268) Yes ☐ No ☐

If Yes, does the waste meet applicable treatment standards already" Yes ☐ No ☐

Part C. Waste / Material Classification

1. Does the material / waste potentially contain any of the following TSCA regulated materials:
Polychlorinated Biphenyls (PCB) ☐ Asbestos ☐ Lead-Based Paint ☐ NA ☐

2. Is the material to be discarded (i.e. abandoned, disposed of, inherently waste-like, etc.)?
Yes ☐ No ☐

3. Is the material / waste to be recycled, accumulated speculatively, or reclaimed?
Yes ☐ No ☐ Describe the intended disposition:

4. Is the material / waste any of the following "Universal Wastes"?
Batteries ☐ Pesticides ☐ Mercury-containing equipment ☐ Bulbs / Lamps ☐ NA ☐

5. Does the waste stream have any of the following characteristics? Yes, specify below ☐ No ☐
Ignitable (D001) ☐ Corrosive (D002) ☐ Reactive (D003) ☐
Flash Point _____ pH _____ ☐ Water Reactive ☐ Cyanide Reactive ☐ Sulfide Reactive

6. Does the waste stream exhibit any Toxicity Characteristic (by TCLP) see 40 CFR 261.24
Yes ☐ No ☐ If Yes, must list applicable waste codes

7. Does the waste stream contain any listed hazardous waste? Yes ☐ No ☐
"F"listed ☐ "K" listed ☐ "P"listed ☐ "U" listed ☐

8. Is the material / waste generated from construction and demolition activities (e.g. concrete, wood, etc.)?
Yes ☐ No ☐

9. Does the waste contain sharps or is it potentially contaminated with blood or body fluids (e.g. needles –used or unused, medical waste)?
Yes ☐ No ☐

10. Would you consider the waste "Municipal Solid Waste" (e.g. trash or garbage – such as product packaging, office paper, plastic bottles, cans, etc.) Yes ☐ No ☐

11. Is the waste putescible (i.e. such as food waste that can decompose / become rotten)?
Yes ☐ No ☐

12. Is the waste potentially toxic agent contaminated? Yes ☐ No ☐
(if yes, must attached "Potentially Agent Contaminated Evaluation form)

13. Is the material / waste a DOT Hazardous Material? Yes ☐ No ☐
If Yes, Proper shipping name: Hazard Class UN or NA No.

Part D. Certification

I, _____ hereby certify that all information submitted in this and all attached documents is to the best of my knowledge an accurate representation of the waste turned in to CDP for treatment. All known or suspected hazards have been disclosed.

_____ _____
Signature of Generator's Representative Date

Part D. Waste Approval

The above described material / waste is approved for treatment and disposal IAW the Special Handling Notes listed below.

1. ___ TSCA regulated management and disposal
2. ___ Disposal at an approved C&D landfill
3. ___ Disposal at an ADEM MSW permitted landfill
4. ___ Management, treatment, and disposal as an ADEM regulated medical waste
5. ___ Recycling as noted below
6. ___ RCRA hazardous waste management and disposal
7. ___ Management and disposal as a RCRA Universal Waste
8. ___ COBRATF Incineration
9. ___ Other, See Special Handling Notes following.

_____ _____
Signature of CDP Environmental Representative Date

Part E. Special Handling Notes