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INTERNAL HAZARDOUS WASTE MANAGEMENT
STANDARD OPERATING PROCEDURE

I. INTRODUCTION

This procedure refers to Boise City Regulation 6.01r, Workplace Hygiene and Management, Section IV. Hazardous Material Storage and Disposal. All waste that meets the definition in the Resource Conservation and Recovery Act (RCRA) of hazardous waste, universal waste, or are regulated under the Toxic Substances Control Act (TSCA) (excluding asbestos and lead-based paint which are addressed in separate management plans) shall be collected, processed, and disposed of in accordance with the following procedure.

This procedure is intended to provide clear step-by-step management guidance to facilitate compliance with all applicable federal, state, and local regulations. However, this procedure does not replace federal and state hazardous waste regulations and the actual regulations should be consulted when needed. The disposal of hazardous waste including universal waste is regulated by the Idaho Department of Environmental Quality. Management of TSCA waste is regulated by Region 10 of the Environmental Protection Agency.

This procedure applies to all waste disposal activities by staff in all city departments and facilities of the City of Boise. Regardless of whether a department utilizes the services of the Public Works Hazardous Materials Coordinator or not, all hazardous/universal and TSCA wastes generated at city facilities must be managed in compliance with all local, state, and federal regulations pertaining to hazardous/universal/TSCA waste management.

II. RESPONSIBILITIES

A. Facility/Department

Each city facility/department is responsible for ensuring all hazardous materials/wastes and nonhazardous materials/wastes are managed and disposed of in a manner which minimizes the risk to health, safety, and the environment.

Each city facility/department is responsible for determining whether the

materials used at their facility/facilities are considered hazardous

waste(s) and/or a TSCA waste when identified for disposal. Safety Data Sheets (SDSs) can be used to assist in determining whether a material would be considered a hazardous waste. The city facility/department can also contact the Public Works Hazardous Materials Coordinator and request assistance in identifying materials in use at their facility/facilities that will require management as a hazardous and/or TSCA waste.

B. Facility/Department Managers and Supervisors

Facility/Department Managers and Supervisors are responsible for ensuring their staff's compliance with this procedure and that wastes are disposed properly in accordance with all applicable local, state, and federal regulations. Facility Management shall ensure their personnel are trained in the proper storage and handling of materials identified as hazardous and provide training on how unwanted materials and/or disposal of hazardous wastes are to be handled. Facility Management can request training assistance from the Hazardous Materials Coordinator as well as Risk and Safety in Human Resources. Work with staff to designate an indoor area (protected from weather and in compliance with regulations) for hazardous waste awaiting collection for proper disposal and designate a staff member as Waste Management Point-of-Contact (POC) for interaction with the Public Works Hazardous Materials Coordinator for disposal of wastes from the facility.

C. Facility/Department Staff

Facility/Department Staff must follow correct procedures for hazardous waste management and disposal in accordance with this procedure. Staff are responsible for determining the type of waste that requires disposal or requesting assistance from the Hazardous Materials Coordinator in making this determination. Staff are responsible for following this policy to ensure wastes are disposed properly and in accordance with all applicable local, state, and federal regulations. Staff shall ensure materials are in transportation-worthy containers that will not result in spills during transport. Staff are also responsible for reporting instances of leakage or other container conditions that would require special handling for transportation to disposal facility. Each facility/department staff should follow the procedures outlined in their specific Asset Management Policy to ensure unused containers of discontinued in-process chemicals are tracked onsite prior to return to distributor. For example, Public Works Operations staff should follow the procedures outlined in the Public Works Operations Asset Management Policy to ensure unused containers of discontinued in-process chemicals are properly tracked prior to return to distributor.

It is the responsibility of the Facility Staff, working in conjunction with Supervisors and Facility Management, to determine whether a product or chemical housed/used at their facility is no longer needed for whatever reason (e.g.,

discontinued use, unusable, change in process etc...). Using facility/staff knowledge, the appropriate Safety Data Sheet (SDS) would be found on the city's SDS management system, internet or requested from the appropriate distributor. Using the SDS as well as working with the Public Works Hazardous Materials Coordinator, Staff will ensure that wastes are disposed properly and in compliance with regulations.

D. Public Works Hazardous Materials Coordinator

The Public Works Hazardous Materials Coordinator is responsible for providing assistance to facility staff that request support with proper disposal of hazardous wastes in accordance with this procedure as well as providing support with hazardous materials management at city facilities, as requested. The Public Works Hazardous Materials Coordinator is responsible for tracking city facility hazardous waste generation information and generator status, and staying current with all pertinent federal, state, and local regulations pertaining to hazardous waste. The Public Works Hazardous Materials Coordinator is also responsible for working with Staff to keep this policy up to date and revised as needed.

III. DEFINITIONS

A. Resource Conservation Recovery Act (RCRA)

The term RCRA is often used interchangeably to refer to the law, regulations and EPA policy and guidance. The law describes the waste management program mandated by Congress that gave EPA authority to develop the RCRA program. EPA regulations carry out the congressional intent by providing explicit, legally enforceable requirements for waste management. Hazardous waste is regulated under Subtitle C of RCRA. EPA has developed a comprehensive program to ensure that hazardous waste is managed safely from the moment it is generated to its final disposal (cradle-to-grave). Under Subtitle C, EPA may authorize states to implement key provisions of hazardous waste requirements in lieu of the federal government. Idaho Department of Environmental Quality has petitioned for, and received, primacy for RCRA oversight in the State of Idaho. If a state program does not exist, EPA directly implements the hazardous waste requirements in that state. Subtitle C regulations set criteria for hazardous waste generators, transporters, and treatment, storage and disposal facilities. This includes permitting requirements, enforcement and corrective action or cleanup.

1. Hazardous Waste

Hazardous waste is defined within RCRA as a federal solid waste that is either (1) from specific sources listed by EPA within RCRA (the F-list, K-list, P-list, U-list); (2) exhibits one or more of the four hazardous waste characteristics (ignitability, corrosivity, reactivity, or toxicity) defined within RCRA; or (3) is mixed with or derived-from certain listed or characteristic hazardous waste.

Hazardous wastes can be liquids, solids, or contained gases. They can be the by-products of manufacturing processes, discarded used materials, or discarded unused commercial products.

2. RCRA Generator Status

- a. Very Small Quantity Generators (VSQGs) [formerly known as Conditionally Exempt Small Quantity Generator] generate 100 kilograms (220 pounds) or less per month of hazardous waste or one kilogram (2.2 pounds) or less per month of acutely hazardous waste. Requirements include the following: must identify all the hazardous waste generated; may not accumulate more than 1,000 kilograms (2200 pounds) of hazardous waste at any time; and must ensure that hazardous waste is delivered to a person or facility who is authorized to manage it.
- b. Small Quantity Generators (SQGs) generate more than 100 kilograms (220 pounds), but less than 1,000 kilograms (2200 pounds) of hazardous waste per month. SQGs may accumulate hazardous waste on-site for 180 days without a permit (or 270 days if shipping a distance greater than 200 miles). The quantity of hazardous on-site waste must never exceed 6,000 kilograms. SQGs must comply with the hazardous waste manifest requirements at 40 CFR part 262, subpart B and the pre-transport requirements at 40 CFR §§262.30 through 262.33. SQGs must manage hazardous waste in tanks or containers subject to the requirements found at 40 CFR §§262.16(b)(2) and (3). SQGs must comply with the preparedness and prevention requirements at 40 CFR §§262.16(b)(8) and (9), and the land disposal restriction requirements at 40 CFR part 268. There must always be at least one employee available to respond to an emergency. This employee is the emergency coordinator responsible for coordinating all emergency response measures. SQGs are not required to have detailed, written contingency plans.
- c. Large Quantity Generators (LQGs) generate more than 1,000 kilograms (2200 pounds) of hazardous waste per month and may only accumulate waste onsite for 90 days. Certain exceptions apply. LQGs do not have a limit on the amount of hazardous waste accumulated onsite. Hazardous waste generated must be managed in tanks, containers, drip pads or containment buildings subject to the requirements found at 40 CFR § 262.17(a)(1)-(4) and, specifically for drip pads and containment buildings, 40 CFR part 265, subparts W and DD, respectively. LQGs must comply with the hazardous waste manifest requirements at 40 CFR part 262 subpart B and the pre-transport requirements at 40 CFR §§262.30 through 262.33. LQGs must comply with the preparedness, prevention and emergency procedure requirements at 40 CFR part 262 subpart M and the land disposal restriction requirements at 40 CFR part 268. LQGs must submit a biennial hazardous waste report.

B. Universal Waste Rule. This rule streamlines the hazardous waste management standards for certain categories of hazardous waste that are commonly generated by a wide variety of establishments.

1. Universal Wastes

Universal wastes are hazardous wastes that are widely produced by households and many different types of businesses. Universal wastes include televisions, computers and other electronic devices as well as batteries, fluorescent lamps, mercury thermostats, and other mercury containing equipment, among others. Universal waste quantities are counted separate from hazardous waste quantities.

2. Universal Waste Handler Status

a. Small Quantity Universal Waste Handler (SQUWH) accumulates no more than 5000 kilograms (11000 pounds) of all universal waste categories combined at their location at any time. SQUWHs can store universal waste for up to one (1) year.

b. Large Quantity Universal Waste Handler (LQUWH) accumulates more than 5000 kilograms (11000 pounds) of all universal waste categories combined at their location at any time. LQUWHs can store universal waste for up to one (1) year.

C. Toxic Substance Control Act (TSCA) provides EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA addresses the production, importation, use, and disposal of specific chemicals including polychlorinated biphenyls (PCBs), asbestos, radon and lead-based paint. NOTE: Asbestos and lead-based paint are addressed in separate management plans which can be found at <http://publicworks.boise.local/forms-and-documents/>. When these materials are identified at city facilities, the appropriate referenced management plan must be adhered to.

IV. WASTE TYPES AND MANAGEMENT PROCEDURES –

Provided are examples of common wastes generated at city facilities, but these examples are not inclusive. Each city facility must determine the proper status of each waste generated to facilitate proper management for disposal.

A. RCRA – Regulated Hazardous Waste - *REVISED August 2021*

1. Paint

a. Oil-based

Oil-based paint is regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous

Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, containers with residue (usually in the form of a “rubbery” puck at the bottom of the container) must be managed as a hazardous waste and cannot be thrown into the trash. Completely empty oil-based paint containers can be placed in the trash.

b. Paint-related Materials

Miscellaneous paint-related products such as two-part epoxies, mineral spirits, paint thinner etc., are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

c. Latex

Latex paint is not regulated as a hazardous waste. However, latex paint is managed through the Business Program of the Household Hazardous Waste Collection Program. Through the Business Program, unwanted latex is sent to a paint reformulator where the paint is reprocessed into a retail product. Since this program is available to City of Boise facilities, the city prefers to handle unwanted latex through the Business Program. When facility staff identify latex paint that is no longer useful, it must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. If latex paint containers are empty or contain dried remnants (no free liquids), they can be placed in the trash.

NOTE: latex paint quantities do not count toward a facility’s generator status.

2. Used or Obsolete Chemicals

Used or obsolete chemicals such as industrial cleaners, degreasers, curing agents, solvents etc. are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

3. Pesticides/Herbicides

Use of pesticides/herbicides is regulated under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and when no longer useful, the disposal of these materials is covered

by RCRA. When deemed no longer useful, pesticides/Herbicides must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff

should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the

Hazardous Materials Coordinator on an as needed basis.

4. Solvent-based Parts Washers

Spent solvent from facility parts washers is a regulated waste. Facilities with solvent-based parts washers must have the washers maintained by a qualified service company to

ensure that waste solvent is managed appropriately and in compliance with regulations. By law, waste manifests generated by the service company and signed by a facility

representative must be kept onsite for at least three (3) years. However, it is the City of Boise's policy to retain these documents for perpetuity. Waste manifests are legal documents

and are important in providing documentation that the facility is managing this waste stream in compliance with regulations.

Note: the amount of spent solvent generated when the washer is serviced does count toward the monthly total amount allowed under the facility's generator status.

5. Unknowns and other wastes

Unmarked/unlabeled containers of materials will have to be characterized to determine appropriate management. There are two ways an unknown and/or waste can be

characterized:

a. Through facility/staff knowledge of materials historically used or currently used at the facility. Using facility/staff knowledge, the appropriate Safety Data Sheet (SDS) would be found on the city's SDS management system, internet or requested from the appropriate distributor. SDS will be used to assist in determination of disposal options; and

b. Through sampling and chemical analysis outlined in RCRA. Based on operations at facility, some analyses could be determined to be unnecessary. If laboratory testing is necessary to characterize the unknown, it is the responsibility of the Hazardous Materials Coordinator to gather the appropriate sampling containers, etc. and coordinate the

onsite sampling of the unknown with the Facility POC. The Hazardous Materials Coordinator will be responsible for shipping the samples to the testing laboratory and coordinating communication with them. Unknowns should be stored in an appropriate container in the designated facility management area until characterization results are available. Management of the unknown will proceed accordingly based on analytical results. If the analytical results indicate the waste exceeds any of the characteristic threshold limits for ignitability, corrosivity, reactivity, and toxicity that are outlined in RCRA, the waste must be managed as a hazardous waste.

B. Universal Hazardous Waste – Regulated Universal Waste

1. Batteries

Rechargeable and specialty batteries (i.e., button and/or wafer-type) are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

2. Lead-acid Batteries

Sealed and unsealed lead-acid batteries are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

3. Fluorescent Bulbs and Compact Fluorescent Lights (CFLs)

Fluorescent bulbs and CFLs contain mercury, are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Bulbs should be stored in an indoor location in such a way as to minimize breakage. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, these items can only be stored for up to one (1) year and therefore require management at least once in a 12-month period.

4. Ultraviolet (UV) Bulbs

UV disinfection bulbs contain mercury, are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Bulbs should be stored in an indoor location in such a way as to minimize breakage. Staff should inform their designated Waste Management POC when they have placed an item in

the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, these items can only be stored for up to one (1) year and therefore require management at least once in a 12-month period.

5. High Intensity Discharge (HID) Lamps

HID lamps include mercury vapor, metal halide, and high-pressure sodium. These lamps contain mercury, are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Lamps should be stored in an indoor location in such a way as to minimize breakage. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, these items can only be stored for up to one (1) year and therefore require management at least once in a 12-month period.

6. Mercury-containing Equipment (i.e., Thermostats and Electrical Switches)

Mercury-containing equipment such as thermostats or electrical switches are regulated and when no longer useful, must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Mercury-containing equipment should be stored in an indoor location in such a way as to minimize breakage. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, these items can only be stored for up to one (1) year and therefore require management at least once in a 12-month period.

7. Electronics/Cathode Ray Tubes (CRTs)

There are no known CRT televisions and/or computer monitors remaining within city facilities. However, if a CRT were to be found, it must be placed in a designated management area for pick up by the Hazardous Materials Coordinator. Electronic equipment that is taken out of service will be evaluated by City IT Staff and designated either for surplus (reuse) or unusable and tagged for electronics recycling. Electronic items tagged for recycling must be placed in a designated waste management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

Abandoned electronics including CRT televisions that are found on city property can be taken by city staff to the electronics recycling area at the Ada County Landfill. Electronics recycling at the landfill is provided free of charge to Ada County residents and businesses.

8. Aerosols – *Revised August 2021*

Aerosols of all types, whether they contain product or are empty, are regulated and when no longer useful, should be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

C. TSCA-regulated Wastes

1. Light Ballasts and Miscellaneous Electrical Equipment

Fluorescent light ballasts that are intact and non-leaking with a Polychlorinated Biphenyl (PCB) -level of less than 50 ppm (generally, typical fluorescent light ballasts fall below this level) are considered a solid waste (not a hazardous waste) and not regulated under TSCA. However, the City of Boise prefers to handle these as a TSCA waste; and regardless of PCB-levels, leaking ballasts must be managed as a TSCA waste. The following criteria are provided to identify fluorescent light ballasts that may contain PCBs:

- Ballasts manufactured before July 1, 1979 may contain PCBs – and for management purposes, should be considered to contain PCBs
- Ballasts manufactured between July 1, 1979 and July 1, 1998 that do not contain PCBs must be labeled "No PCBs"
- If a ballast is not labeled "No PCBs," and was manufactured before 1998, it is best to assume it contains PCBs
- Ballasts manufactured after 1998 are not required to be labeled. If there is not a clear date stamp indicating 1998 or later, for management purposes, the ballast should be considered to contain PCBs.

Light ballasts that are no longer functioning or are unwanted should be inspected using the above criteria. Ballasts that are clearly marked "No PCBs" can be recycled through each city facility's metals recycler. Ballasts that are date stamped 1998 or later do not contain PCBs and do not have to be marked "NO PCBs." These ballasts can also be recycled through each city facility's metals recycler. Ballasts that are not clearly marked, date stamped, or have a manufacture date before July 1, 1979 must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis. However, these items can only be stored for up to one (1) year and therefore require management at least once in a 12-month period.

D. Miscellaneous Wastes

1. Used Oil, Lubricants, Greases

Used oil, lubricants, and greases are regulated and should be managed through a used oil recycler/fuels blender contractor. Any products that are not accepted by the oil recycling/fuels blending company must be placed in the designated management area for pick up by the Hazardous Materials Coordinator. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

Note: When used oil, lubricants, and greases are managed through a fuels blender contractor who reuses the materials for their BTU value, the materials do not count against the facility's generator status. If a fuels blender contractor is not utilized for the management of these types of materials, the materials should be placed in the designated management area for pick up by the Hazardous Materials Coordinator. In the latter case, quantities of these materials would count toward the monthly total amount allowed under the facility's generator status.

- E. Facility-specific Waste Generation

1. Water Quality Lab

The Water Quality Lab at the West Boise Water Renewal facility provides a unique function for the City of Boise. Wastes generated at this facility are regulated and vary depending on the types of analyses performed. When waste is generated, staff should place it in the appropriate storage container and place it in the designated management area for pick up. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

2. Boise Police Department (BPD) Crime Lab

The BPD Crime Lab at City Hall West provides a unique function for the City of Boise. Wastes generated at this facility are regulated and vary depending on the types of analyses performed. When waste is generated, staff should place it in the appropriate storage container and place it in the designated management area for pick up. Staff should inform their designated Waste Management POC when they have placed an item in the management area for pick up. The POC will notify and schedule pick up with the Hazardous Materials Coordinator on an as needed basis.

3. Water Renewal Facilities

Water Renewal Facilities staff utilize abrasives chambers for cleaning and paint removal on the outer surface of equipment and parts. When the abrasive media is replaced, a sample of the used media must be collected

for laboratory testing to determine whether the media characterizes as a hazardous waste (i.e., lead-containing waste). At least two (2) weeks prior to removing the media, the facility POC should contact the Hazardous Materials Coordinator and inform them of the event. It is the responsibility of the Public Works Hazardous Materials Coordinator to gather the appropriate sampling containers, etc. and coordinate the onsite sampling of the media with the Facility POC. The Public Works Hazardous Materials Coordinator will be responsible for shipping/transporting the samples to the testing laboratory and coordinating communication with them. Spent media should be stored in an appropriate container in the designated facility management area until characterization results are available. Management of the spent media will proceed accordingly based on analytical results.

4. In-process Chemicals

Chemicals purchased for in-process uses should be completely used up. If in-process chemical changes are under consideration, facility management and other appropriate staff (e.g., Public Works Engineering for Public Works facilities) should adhere to their department's procedures (e.g., For Public Works, this is outlined in the Public Works Operations Asset Management Policy and inform the Hazardous Materials Coordinator who can assist with identifying possible waste management implications. To avoid waste management of large quantities of in-process chemicals, water renewal facility chemical supply contracts should include a distributor take-back clause for unused containers.

V. ANNUAL REVIEW OF POLICY/TRAINING

Facility Management and Supervisors are responsible for reviewing this policy at least once each year with staff. Facility Management can request training assistance from the Hazardous Materials Coordinator as well as Risk and Safety in Human Resources.

VI. REGULATORY IMPACTS

Improper handling and disposal of regulated waste can have significant environmental and regulatory impacts. Staff should work to minimize the generation of waste to the greatest extent practical and ensure compliance with applicable local, state, and federal regulations for proper waste management/disposal.