

APPENDIX F
WASTE MANAGEMENT PLAN

TABLE OF CONTENTS

	<u>Page</u>
1. INTRODUCTION	1
2. PROJECT WASTE DESCRIPTIONS	1
3. WASTE MANAGEMENT	1
3.1. Waste Classification	2
3.2. Waste Management	2
3.2.1. RCRA Hazardous Wastes	3
3.2.2. Non-RCRA California Hazardous Waste	4
3.2.3. Hazardous Waste Containers and Labeling	4
3.2.4. Hazardous Waste Accumulation Areas.....	5
3.2.5. Non-Hazardous Wastes	6
3.3. Containment Structures and Procedures	8
3.3.1. Water Storage Tank.....	8
3.3.2. Tank Truck Loading/Unloading.....	8
3.4. Best Management Practices	8
4. WASTE TRANSPORTATION AND DISPOSAL	9
5. WASTE MINIMIZATION.....	10
6. WASTE MANAGEMENT INSPECTION AND DOCUMENTATION PROGRAM.....	11
6.1. Inspections	11
6.2. Documentation.....	12
6.3. Hazardous Waste Manifests and LDR Notifications.....	12
7. UPDATING THE WASTE MANAGEMENT PLAN	13

1. INTRODUCTION

This WMP describes the following

- project waste streams,
- waste classification requirements,
- stockpile management,
- waste transportation and disposal,
- BMPs,
- waste minimization, and
- waste management inspections and documentation.

It will be the responsibility of the Site Superintendent to ensure that project personnel are aware of the applicable waste management, transportation, and disposal requirements associated with this project. The WMP will be revised if there are changes to the project work scope and/or applicable regulations.

2. PROJECT WASTE DESCRIPTIONS

The waste streams that may be generated during closure activities are discussed in more detail in the Closure Plan. Appendix F summarizes applicable waste management requirements including characterization, containment, storage, transportation, and disposal requirements for each of the anticipated waste streams.

3. WASTE MANAGEMENT

Title 22 CCR Sections 66261, 66262, and 66264 and 40 CFR Parts 261, 262, and 264 are applicable state and federal regulations for the management of hazardous wastes generated during this project.

3.1. Waste Classification

The state requirements for determining whether a waste is hazardous under the toxicity characteristic consists of analyzing the sample by the Waste Extraction Test for comparison with the STLC criteria and a totals analysis for some inorganic and organic compounds for comparison with the TTLC. The STLC criteria are generally more conservative than the federal TCLP criteria. California also has additional waste classification criteria (including fish bioassays) that may need to be considered on a case-by-case basis. Therefore, some wastes may be considered hazardous wastes under California regulations and not under federal regulations. These wastes are referred to as non-RCRA (California) hazardous wastes.

To evaluate if the excavated wastes are hazardous wastes, analytical testing will be performed in accordance with applicable sections of Title 22 CCR Section 66261 and 40 CFR Part 261. Testing may also need to include ignitability, corrosivity, reactivity, and TCLP in accordance with the latest edition of "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846.

3.2. Waste Management

The excavation of buried wastes will result in the temporary accumulation of hazardous and non-hazardous wastes that will be managed, accumulated, and inspected in accordance with applicable regulatory requirements and this work plan. Excavated wastes will be segregated according to the waste classification and temporary stockpiled in areas designated in Figure 13 of the Closure Plan and subject to Airport Authority approval.

Title 22 CCR Section 66262 and 40 CFR Part 262 consist of regulations applicable to the generation, storage, management, and accumulation of hazardous wastes. Specific requirements that apply to the accumulation and management of hazardous wastes are discussed below.

3.2.1. RCRA Hazardous Wastes

If excavated wastes are evaluated to be RCRA hazardous waste, then the RCRA staging pile regulations of 40 CFR 264.554 may apply. Under these regulations, a staging pile is an accumulation of solid, non-flowing remediation waste that is temporarily stored at a facility. However, the land disposal restrictions, minimum technology requirements, and the waste pile permitting requirements of RCRA hazardous wastes can be precluded by proper designation and management of a staging pile. The temporary stockpile will be located at the origin of the waste and within the contiguous property boundary. The requirements of the staging pile regulation are listed below.

- The standards and design criteria for the staging pile shall facilitate a reliable, effective, and protective remedy and shall consider the volume and types of wastes intended for storage, length of operation, potential for release from the unit, potential migration from potential releases, and potential for exposure to human and environmental from potential releases.
- The staging pile shall be designed to minimize releases of hazardous wastes and hazardous constituents into the environment, and minimize cross-media transfer, as necessary to protect human health and the environment. The design measures may include liners, covers, run-on/run-off controls, or other means.
- The staging pile shall not operate for more than 2 years.
- Within 180 days following the operating term of the staging pile, it shall be closed in accordance with 40 CFR 265.258(a) and 265.111. Part 265.258(a) requires the owner/operator to remove and decontaminate all waste residues, contaminated containment system components (e.g., liners), contaminated subsoils and structures, and equipment contaminated with waste and leachate, and manage them as hazardous waste. Part 265.111 requires the owner/operator to close the facility in a manner that minimizes the need for further maintenance, and controls, minimizes, or eliminates, to the extent required to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface waters, or to the atmosphere.
- The designated area, design, and the specific closure requirements for a proposed staging pile shall be prepared by the Contractor and submitted to the Airport Authority for approval.

- Hazardous wastes containing free liquids have stringent secondary containment requirements. These requirements include:
 - a base free of cracks or gaps and sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is removed,
 - a sloped base or containment system designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation (Alternatively, the containers may be elevated on pallets to prevent contact with accumulated liquids.), and
 - the containment system shall have sufficient capacity to contain 10% of the volume of containers or the volume of the largest container, whichever is greater.

3.2.2. Non-RCRA California Hazardous Waste

For non-RCRA hazardous waste, the material can be stockpiled at the site for up to 90 days without strict compliance with the substantive requirements of a hazardous waste facility permit, provided the following conditions are met (California Health and Safety Code, Division 20, Chapter 6.5, Section 25123.3):

- the waste does not contain free liquids,
- the waste is accumulated on a vapor barrier (minimum 20-millimeter liner),
- potential wind dispersion and stormwater runoff are controlled,
- site inspections are conducted weekly and after storms to ensure the erosion controls are working properly,
- after final off-site disposal, the accumulation area is inspected and remedied as necessary, and
- the site is certified for compliance with these standards by a California-registered Civil Engineer.

3.2.3. Hazardous Waste Containers and Labeling

Containers utilized for storing potentially hazardous or hazardous wastes (federal and state) will be installed, managed, and inspected in accordance with the substantive requirements of 40 CFR 66264.191 through 66264.194 and Title 22 CCR Part 264.191

through 264.194. Title 22 CCR Section 66262 and 40 CFR Part 262 include applicable requirements for facilities that store hazardous wastes in tanks or containers for over 90 days. These regulations require specific engineering and design specifications, daily inspections of primary containers, adequate secondary containment (i.e., 100 percent of the tank volume plus the maximum rainfall from a 25-year 24-hour storm event), and closure standards.

Containers storing hazardous wastes will initially be labeled with indelible ink with the following information: source, location, contents, quantity, potential health, safety, and environmental hazards, accumulation start date, date last sampled, parameters analyzed for, contact information, and the words “Analysis Pending – Potentially Hazardous.” Once containers are determined to contain hazardous waste they will immediately be labeled with a completed “Hazardous Waste” label, which will include:

- EPA Identification Number of the generator,
- name and address of the generator,
- EPA waste code,
- DOT shipping name (prior to off-site shipment),
- description of contents, and
- date of generation (date waste was first placed in container).

Drums/containers containing potentially radioactive contaminated materials will be labeled with the dose-rate, and placed in a designated area, with the appropriate markings.

3.2.4. Hazardous Waste Accumulation Areas

Hazardous waste storage areas will require the following:

- signage indicating “Danger Hazardous Waste Area-Unauthorized Personnel Keep Out” (written in English and Spanish) will be posted at each 90-day accumulation area in sufficient numbers to be seen from any approach and will be legible from a distance of at least 25 feet;

- sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency will be provided, unless aisle space is not needed for these purposes;
- the following emergency equipment will be located or available to personnel during active waste management activities at each accumulation area:
 - a telephone or hand-held two-way radio, capable of summoning emergency assistance,
 - portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment, and
 - water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

Bulk quantities of fuel, oil, or other hazardous materials will not be stored on site.

3.2.5. Non-Hazardous Wastes

The stockpiling of contaminated materials that are not hazardous wastes is considered a temporary discharge by the RWQCB. Under Resolution No. 95-96, the RWQCB waives the filing of a report of waste discharge (RWD) and the adoption of WDRs provided the discharges comply with the conditions in the resolution, the Comprehensive Water Quality Control Plan, San Diego Basin (Basin Plan), and the applicable regulations of other public agencies. This waiver will not apply to those discharges for which WDR have been previously adopted.

As indicated in Resolution No. 95-96, conditions for temporary waste stockpiles of contaminated materials include the following:

- The materials shall not be hazardous wastes, pursuant Title 22 CCR Section 66261.3.
- The storage of contaminated stockpiles and related materials shall be limited to 90 days.
- The site shall be restored to its original state within 30 days.

- The stockpiled materials shall be from one source.
- Berms shall be constructed to prevent surface run-on/run-off.
- Stockpiles shall be protected from a 100-year peak stream flows (flood), as defined by the County flood control agency.
- The waste discharger shall not cause the occurrence of the following:
 - coliform or pathogenic organisms in water pumped from the basin,
 - objectionable tastes and odors in water pumped from the basin,
 - waters pumped from the basin to foam,
 - the presence of toxic materials in waters pumped from the basin,
 - the pH of water pumped from the basin to fall below 6.0 or rise above 9.0, and
 - pollution, contamination, nuisance, or adversely affected beneficial uses of the ground or surface waters of the hydrologic subareas established in the Basin Plan.
- Groundwater shall be protected by placing wastes at least five feet above the highest anticipated groundwater level.
- Surface water shall be protected by locating stockpiles not less than 100 feet from any surface water identified in the Basin Plan.
- Stockpiles will be covered and liner protected with plastic sheeting, a minimum thickness of 10 millimeter).
- Notification shall be given to the RWQCB Executive Officer concerning discharge of ponded water associated with stockpiles if the water is discharged at a location other than a permitted discharge points.
- The property owner shall approve the placement of the soil/waste at the site by written correspondence to the RWQCB.
- Activities shall comply with applicable local agency requirements.

In addition to the aforementioned requirements, the State Water Resources Control Board Policy Number 99-08, which pertains to the control of stormwater discharges

from construction activities, may also be applicable to the temporary storage of stock-piled materials.

3.3. Containment Structures and Procedures

This section describes the various containment structures that may be required.

3.3.1. Water Storage Tank

The water storage tanks will be placed as shown on Figure 13, subject to Airport Authority approval. A berm will be constructed around the tanks and the bermed area will be lined. The bermed area will have a holding capacity based on the volume of the holding tank. Rainwater that collects in the bermed areas will be pumped into the tank. The tank exterior will be inspected daily for signs of leakage or deterioration. Leaks will be promptly repaired.

3.3.2. Tank Truck Loading/Unloading

Tank car and tank truck loading/unloading activities will be conducted in the bermed area and in accordance with the requirements and regulation established by the DOT. Warning signs will be posted and verbal authorization required to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines. Prior to filling and departure of tank car or tank truck, the lowermost drain and all outlet of such vehicles will be examined for leakage, and if necessary, tightened, adjust, or replaced to prevent liquid leakage while in transit.

3.4. Best Management Practices

For all wastes generated, appropriate BMPs will be implemented to protect the temporary stockpiles from erosion and stormwater run-on and run-off. The methods for implementing these BMPs will be established by the Site Superintendent. The BMPs include the following:

- erosion control,
- storm water drainage control,

- secondary containment (as applicable),
- fugitive emissions control,
- wind dispersion control, and
- spill prevention.

4. WASTE TRANSPORTATION AND DISPOSAL

The Contractor will only use transporters and disposal facilities that are licensed and/or permitted and insured. The Site Superintendent will be responsible for managing the transportation and disposal of wastes to appropriate disposal/recycling facilities.

The Contractor will prepare waste profiles for Airport Authority review and signature, and then forward them to each disposal/recycling facility for acceptance. Waste profiles will be based on characterization of individual stockpiles and containers and waste analytical reports.

The Contractor will schedule shipments of the wastes after notice of acceptance. The Site Superintendent will make every effort to schedule the removal of the wastes at the earliest possible to prevent unnecessary accumulation of wastes.

Vehicles and vessels entering the site for loading of wastes and contaminated material slated for disposal will be tracked and decontaminated, prior to their departure from the site. Care will be taken to avoid materials being tracked off site. Non-contaminated mud, rock, or dirt inadvertently tracked onto McCain Road will be promptly removed from the travel way.

Hazardous wastes transported offsite for disposal or recycling will be performed in accordance with the DOT Hazardous Material Transportation regulations of 49 CFR Parts 171 through 180, 40 CFR Part 262, Subpart B and Title 22 CCR Section 66262, which involve packaging, placarding, labeling, and manifesting requirements. Hazardous wastes transported will also have appropriate LDR certification notices per 40 CFR Part 268 and Title 22 CCR Section 66268. Personnel having the required DOT-training will perform DOT-related functions.

Wastes that have been characterized as non-hazardous and do not exhibit the DOT hazard class characteristics (i.e. explosives, gases, flammable/combustible liquids, flammable solids/spontaneously combustible materials/dangerous when wet materials, oxidizers and organic peroxides, toxic materials and infectious substances, radioactive materials, and corrosive materials) are not regulated under DOT rules for hazardous material transportation. If a material is suspected to be hazardous, it will be shipped under the appropriate hazard class. Hazardous wastes will be transported under DOT hazardous material regulations.

Trucks carrying consumer refuse will be covered/enclosed such that there is no odor during transportation along the haul route. Open trucks will not be permitted to transport wastes off site.

5. WASTE MINIMIZATION

Waste minimization practices will be followed, to the extent practical, to reduce the volume of wastes generated, stored, and disposed off site. The general guidelines provided below will be followed to minimize the volume of wastes.

- Excavation activities will be planned based on the work procedure to be used.
- Only materials required for the work activity will be at the site. Additional materials can be brought to the site if it is found to be necessary.
- Containers will be used to minimize the spread of contamination, as necessary.
- Materials can be stored in large containers, but the smallest reasonable container will be used to transport the material to the location where it is needed.
- Cleaning and extra sampling supplies will be maintained outside any potentially contaminated area to keep them clean and to minimize additional waste generation.
- Prefabricated materials, (e.g. barriers, support equipment) will be maintained or constructed outside potentially contaminated areas.
- Mixing of detergents or decontamination solutions will be performed outside potentially contaminated areas.
- Drop cloths or other absorbent material will be used to contain small spills or leaks.

- Contaminated materials will not be placed with clean materials.
- If used, wooden pallets inside the exclusion zone will be covered with plastic.
- Materials and equipment will be decontaminated and reused when practical.
- Volume reduction techniques will be used, when practicable.
- Waste containers will be checked to ensure they are solidly packed to minimize the number of containers.
- Only those waste containers adequate in size to contain the volume of waste generated will be used.
- Minimal amounts of decontamination water and rinses will be used.

6. WASTE MANAGEMENT INSPECTION AND DOCUMENTATION PROGRAM

This section presents the waste inspection procedures and documentation program.

6.1. Inspections

The Site Superintendent will conduct inspections of the stockpiled and containerized wastes. The inspection results will be recorded on the Daily Inspection Form and signed daily by the Site Superintendent. The following waste management inspection activities will be performed:

- waste accumulation areas will be informally inspected on a daily basis;
- formal inspections of accumulation areas will be conducted and documented weekly, in accordance with 40 CFR 264 Subpart I and Title 22 CCR Section 66264;
- daily inspections shall be conducted for tanks containing water;
- waste and soil stockpiles will be inspected daily to ensure liners are in-place, the stockpiles are adequately covered, and the covers are sufficiently secured;
- the container storage area will be inspected to:
 - verify they are in good condition and not leaking,

- to confirm they are constructed of materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, and
- to confirm they are closed at all times, except when adding or removing wastes;
- the inspections will ensure containers/tanks are properly labeled, in good condition, and absent of apparent structural defects, deterioration, or visible leaks; and
- if a container is not in good condition or appears to be leaking, the wastes will be transferred from the deficient container into another container without spilling or leaking.

6.2. Documentation

Documentation requirements will apply to all wastes managed during closure. The Site Superintendent will record waste generation activities in a field logbook signed and dated daily. The following information will be recorded in the logbook:

- description of waste generating activities,
- location of waste generation (including depth, if applicable),
- types and volumes of wastes generated,
- date and time wastes were generated, and
- descriptions of waste sampling activities, including
 - sample locations,
 - analytical test methods,
 - analytical testing laboratory,
 - sampling methodology, and
 - name of sampler.

6.3. Hazardous Waste Manifests and LDR Notifications

Hazardous wastes transported from the site will be accompanied by a Hazardous Waste Manifest. The Airport Authority Project Manager will review and sign the waste documentation, including waste profiles, manifests, and land disposal restriction (LDR) notifications.

The Contractor will:

- confirm that applicable pre-transportation requirements such as labeling and placarding the wastes are in accordance with 40 CFR 262.30 through 262.33 and 49 CFR Parts 100 through 180,
- notify the accepting waste disposal facility prior to sending the wastes,
- provide the Airport Authority with the generator copies of the waste manifests for submittal to the state, and
- be responsible for retaining copies of all hazardous waste manifests in the project file.

An LDR form will accompany the hazardous waste to the disposal facility. The following items will accompany the notification and are included in one of the following facility specific forms:

- EPA Hazardous Waste Generator identification number,
- manifest number (including state disposal application number), and
- waste analysis data.

Per 40 CFR 262.20 through 262.44, RCRA record keeping requirements will be adhered to, including retention of signed copies of manifests from the designated facility that received the wastes. Additionally, the documentation will comply with Title 22 CCR 66262.41, 66261.42, and 66262.43, and 40 CFR 262.41, 262.42, and 262.43.

7. UPDATING THE WASTE MANAGEMENT PLAN

As necessary, the WMP will be updated as changes in site activities or changes in applicable regulations occur.