

Standard Operating Procedure for Special Waste Screening at the Materials Management Facility

1.0 PURPOSE

The purpose of this procedure is to document the Development Authority of the North Country's (Authority) Standard Operating Procedure (SOP) for screening requests to accept special waste at the Materials Management Facility (MMF). Special wastes must be properly screened since the Authority's landfill is not permitted as a treatment, storage, and disposal facility for hazardous wastes.

2.0 DEFINITIONS

Special waste is defined in Section 11.4 of the Authority's Solid Waste Disposal Permit Requirements Permit Application & Landfill Site Rules as waste with the potential to exhibit a characteristic of hazardous waste as defined in NYCRR Part 371, Section 371.2 and 40 CFR Part 26 including ignitability, corrosivity, reactivity, or toxicity. Waste may also be hazardous due to its composition, origin, or because it requires special handling for disposal (i.e., asbestos). Examples of special waste include, but are not limited to, non-hazardous contaminated soil, industrial and sewage sludge, industrial wastes, and building materials.

3.0 RESPONSIBILITIES

The Materials Management Division Director is responsible for overseeing the waste screening program and ensuring that the requirements outlined in this procedure are implemented at the facility.

The Landfill Superintendent participates in the special waste screening procedure and is responsible for technical matters relating to Operations at the facility.

The Assistant Landfill Superintendent oversees the daily operations of the facility and ensures that special wastes are handled properly during their disposal at the facility.

The Environmental Health & Safety Manager (EHSM) is responsible for implementing this procedure, reviewing special and asbestos waste requests, and soliciting technical assistance from the Chief Operating Officer if requests are for an unfamiliar waste stream that presents greater risks for the facility to accept. In the event external consultation is required to complete an assessment of a special waste disposal request the EHSM will engage an outside consultant.

The Administrative Associate and the Customer Service Coordinator are responsible for processing special waste requests, directing technical inquiries to the SWMFspecialwaste@danc.org email distribution list, and adding customer data to paradigm to ensure that waste is properly classified and billed when it enters the landfill.

The Safety & Environmental Technician (S&ET) is responsible for reviewing and responding to routine special waste requests in accordance with this SOP and for consulting with the EHSM, and the Division Director, to evaluate non-routine special waste requests.

The Chief Operating Officer is responsible for providing assistance to the EH&S Manager and Division Director with reviewing technical requests for special waste. This assistance may entail performing site visits, meeting with facility/site owners to discuss sampling protocols, waste generation process, etc.

4.0 PROCEDURE

A special waste screening review is initiated when a customer requests authorization to dispose of a material meeting the definition in Section 2.0 of this SOP. The generator, or their agent, shall be required to complete the Authority's Special Waste Profile and Generator Certification Form which are available on the Authority's website at the following locations:

<https://www.danc.org/media/Operations/Materials%20Management/LandfillPermits/SpecialWasteScreeningFillableForms>

Generators must accurately complete the Special Waste Profile, and Generator's Certification Forms before the Authority determine if the material is acceptable under MMF's operating permits. Failure to accurately screen wastes could lead to permit violations, and regulatory enforcement.

4.1 CONSTRUCTION AND DEMOLITION DEBRIS

Building materials not generated by homeowners among regular municipal waste must be screened for hazardous materials. All building materials except glass, wood, metal, and concrete have been deemed suspect by state and federal agencies. MMF is allowed to receive asbestos containing materials, but they must be identified and handled with special precautions. Paints and caulks are suspect for other hazardous materials and must be demonstrated to contain levels below the limits of MMF's permits.

Without documentation of a building survey and laboratory analysis of samples, all C&D is considered Regulated Asbestos Containing Material which must be treated as friable asbestos-containing material. Generators may choose to forgo the survey and testing if the waste is considered Regulated Asbestos Containing Material and disposed of as friable asbestos waste. However, the generator is not exempted from determining if the waste contains materials which may contain lead or PCBs and submitting acceptable test results.

Applications for C&D generated from buildings constructed prior to 1978 require a survey by an EPA licensed professional for lead based paint and an acceptable TCLP sample analysis for approval. Similarly, generators must provide documentation for C&D originating from buildings constructed prior to 1978 that no caulking material associated with the waste exceeds allowable limits for PCBs.

4.2 OTHER SPECIAL WASTE

Customers requesting authorization to dispose of other special wastes must describe the origin of the waste, and submit records of analytical testing, so the Authority can verify the material is not a regulated hazardous waste. Analytical requirements for various types of wastes are provided in the Special Waste Profile Form. Wastes which do not meet the description of one of the existing waste profiles shall be handled on a case-by-case basis by EH&S to ensure the waste is acceptable under MMF's permits.

Analytical testing will not be required for virgin fuel spills at residential properties if the Special Waste Profile Form is accompanied by a letter from the NYSDEC stating that, based on their knowledge, the waste will not exhibit characteristics of hazardous waste and is therefore deemed non-hazardous.

4.3 ONGOING INDUSTRIAL SPECIAL WASTES

Some industrial customers engage in the long-term production of a consistent waste stream which requires additional consideration or handling. Ongoing special wastes are screened and approved using the same criteria and process as other special wastes. Because manufacturing and industrial processes have the potential to change over time, the Authority maintains a spreadsheet to track Ongoing Special Wastes, and requires annual re-submission of the Special Waste Screening Form, including new laboratory analysis, for each profile. PM 000415 has been created in NexGen for May 1st of each year to contact the generator of each Ongoing Special Waste to renew or discontinue their profile. Ongoing Special Waste contracts are tracked here [T:\SPECIAL WASTE\Ongoing Special Waste\Ongoing Wastes Tracking Log.xlsx](#)

4.4 SPECIAL WASTE APPROVAL PROCESS

Customers shall submit completed Special Waste Profile Forms with supporting documents electronically to SWMFspecialwaste@danc.org. The email will be routed to the S&ET, EHSM, Administrative Associate, Customer Service Coordinator, Assistant Landfill Superintendent, Landfill Superintendent, MMF Division Director, and Chief Operating Officer. Utilizing a group email ensures responses from the Authority are not delayed if a specific employee is unavailable. Requests will be acknowledged promptly, and every effort will be made to respond within one business day.

Submittals must be complete with all supporting documentation, and will not be reviewed without completed Generator and Sampling Certification Forms to certify the validity of their submission.

Upon receipt of a *Special Waste Profile Form*, the S&ET shall verify:

- Submitted forms are complete and present.
- Provided spill number(s) is correct by checking the [DEC's website](#), if applicable
- A chain of custody accompanies the analytical data.
- Analytical methods used are listed in SW-846.
- Certifications were provided for the lab which performed the sample analysis.
- Analytical data does not have qualifier flags which make results questionable.
- Enough samples were obtained to ensure representativeness, as outlined in the Environmental Protection Agency's Hazardous Waste Test Methods/SW-846. A summary of the requirements are included in the [Special Waste profile Form](#).
- Waste generation process is understood to ensure proper analytical testing for potential listed hazardous wastes, in addition to characteristic hazardous wastes.
- Listed material is non-hazardous and falls within acceptable limits by comparing the analytical testing results against the limits specified in 6 NYCRR Part 371.
 - If results are within 70% of the regulatory limit, additional sampling may be requested (depending on the risk of the material and reviewer's confidence in the representativeness of sampling).
- Hauler is permitted to deliver waste to the MMF and that the entity to be billed has an account and it is in good standing by consulting with the Customer Service Coordinator or Administrative Associate, or their designee.
- The request was added to the Special Waste Request Log located at: \\MMF-FS\SHARE\PERMITTING – REGULATORY\Environmental\Special Waste Requests

Additional considerations during the screening process include:

- Non-beneficial use waste from outside the region is excluded for disposal.
- Beneficial use waste from outside the region requires approval from the Division Director, Chief Operating Officer, and Executive Director.
- Materials known to be contaminated with perfluorooctyl sulfonate (PFOS) and perfluorooctanoic acid (PFOA) will not be accepted until more information is known about these contaminants and guidance is provided by regulatory agencies.
- Pre-production plastics are industrial wastes which are difficult to remove once in the stormwater system. When identified for disposal through the special waste program, these wastes must be prescheduled for delivery and identified at the scale so proper procedures are followed to immediately cover this waste.
- The NYS Food Donation and Food Scraps Recycling law requires certain businesses and institutions that generate an annual average of two tons of wasted food per week or more to, donate excess edible food; and recycle all remaining food scraps if they are within 25 miles of an organics recycler (composting facility, anaerobic digester, etc.). The Authority will review requests for Food Waste prior to acceptance, to ensure that the material is not coming from a regulated facility.

Upon completion of the review, the S&ET and/or the EHSM shall make a recommendation for acceptance by replying to the initial email submission. Determinations may include denying the material, accepting the material, requesting additional information, or the need for additional technical review by internal or external engineering resources.

Once accepted, the Special Waste Acceptance Agreement will be completed by the Administrative Associate/Customer Service Coordinator, and forwarded to the appropriate county for billing approval. Once county approval is obtained, the Administrative Associate/Customer Service Coordinator will forward the acceptance agreement to the requesting customer for signature. The Special Waste Acceptance Agreement is located T:\SPECIAL WASTE\Forms\Special Waste Agreement Fillable Form.pdf

4.5 PREPARING TO RECEIVE THE SHIPMENT

The Administrative Associate/Customer Service Coordinator shall receive and save signed Acceptance Agreement Forms in the designated folder within T:\Permitting – Regulatory\Environmental\Special Waste\Special Waste Requests\ with all supporting documentation. The Administrative Associate/Customer Service Coordinator shall then set the project up in the scale software and notify the scale operators of the pending project.

SECTION 5.0 RECORD OF REVISIONS

<u>Revision No.</u>	<u>Description of Changes</u>	<u>Revision Date</u>	<u>Authorized By</u>
0	Document Created	5/3/2012	Richard R. LeClerc
1	Changed wording on form in Appendix A page 7, added option for Totals Analyses in testing requirements Appendix B, changed detection level for PCB's to 500 ppb.	9/7/2012	Richard R. LeClerc
2	Appendix B changed PCB acceptance level to <50 ppm and detection limit to 5 ppm, changed location of Special Waste Files. Updated swmfspecialwaste@danc.org email list.	5/27/2014	Richard R. LeClerc
3	Minor editorial changes, added Non-PCB Dielectric Transformer Oils and testing requirements to Appendix B	6/12/2015	Richard R. LeClerc
4	Added exemption for analytical testing for virgin fuel spills at residences. Added Asbestos containing waste acceptance procedure. Added virgin spill questions to Appendix A. Removed requirement for Authority signature for approval. Added that total constituent analysis is an acceptable substitute for all TCLP analysis in Appendix B if requirements noted in footnote ⁸ are met. Created new waste category for industrial paper manufacturing sludge based on historical review of data. Added question on BUD wastes in Section 6 of App A.	12/22/2015	Richard R. LeClerc
5	Updated directions to include additional review time for larger projects.	9/15/2016	Richard R. LeClerc
6	SWMF to MMF, Division Mgr updates, email routing, direction for out of region wastes in section 4.6, minor editorial changes	06/04/2018	P. Pastella
7	Removed reference to county surcharges from Section 4.7 as they are no longer line items in the agreements. Added actions for receiving preproduction plastics; Updated Appendix C: Ignitability updated to include 3 additional methods as identified in EPA SW-846; Reactivity updated to reflect regulatory language found in 40 CFR 261.23 and formatting of tables. Clarified surcharges in Appendix D. Other minor editorial changes.	11/14/2018	P. Pastella
8	Update job titles, referenced sections of the Authority's Solid Waste Permit Policy, added references to New York State's Food Waste regulations Update sw-846 Method and limit for Ignitability of Solids	11/22/2021	C. Tuttle
9	Update job title for EH&S Mgr., updated hyperlink to EPA's website in Appendix B	11/14/2022	R. Gaumes
10	Major revision including changes in the waste screening process to make a single special waste disposal application form, and add C&D requirements. Removal of screening and acceptance forms from the appendices, and the creation of separate fillable PDF forms.	10/5/2023	C. Tuttle