



Region 6 RRT

State of Arkansas

State of Louisiana

State of New Mexico

State of Oklahoma

State of Texas

*U.S. Environmental Protection
Agency*

U.S. Coast Guard

U.S. Department of Agriculture

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Commerce/NOAA*

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*U.S. Nuclear Regulatory
Commission*

U.S. Department of State

Regional Response Team 6

WASTE DISPOSAL PLAN GUIDELINES

A Template for Managing Waste during Large Oil Events

January 15, 2015

WASTE DISPOSAL PLAN GUIDELINES

Disposal Plan for _____ Incident

Incident Name

Responsible Party: _____ Spilled Material: _____

Spill Location: _____ Spill Date/Time: _____

Report Update Time: _____

Disposal Plan Authorization

This plan is written at the request of the United States Environmental Protection Agency (USEPA), the United States Coast Guard (USCG) and the State of _____, _____state regulatory authority.

The responsible party will recover the maximum feasible amount of oil spilled during the above named incident. In addition, an unknown quantity of oily waste debris (including vegetation, sorbents, boom, trash etc.) will be recovered. When disposing of this material, the responsible party will abide by all applicable state, local and federal waste disposal laws and regulations. Disposed material will be tracked to provide an accurate means of estimating total oil recovered.

This plan may be amended as necessary to ensure compliance with all applicable laws and regulations. Amendment may occur only upon mutual agreement of the responsible party, the Federal OSC (USEPA), and/or the State authority.

NOTE: This document is a template created for guidance purposes only and should not be construed as the required waste management plan for an incident. This template is intended to only provide basic information to assist a party in producing a waste management plan for an individual incident, and is not intended to replace a template previously created and used by a party. If a party does have a waste management plan template, that template can be used in lieu of this document. While this template has been reviewed by waste managers from all states within RRT VI, solely for the purpose of providing a starting point to produce a waste disposal plan, it does not guarantee that all state or federal waste regulations have been covered. Prior to finalizing a waste disposal plan for a particular incident, it is recommended that local jurisdictional waste management personnel be consulted to ensure that all appropriate rules and regulations have been addressed.

Approval Page

Submittal and Approval: _____

Operations Section Chief

Planning Section Chief

Logistics Section Chief

Finance Section Chief

Unified Command Approval

Approved by FOSC: _____

Date: _____

Approved by SOSC: _____

Date: _____

Approved by RP: _____

Date: _____

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Section I: Waste Identification/Transport/Practices

Recovered pollutant(s) will be separated by waste stream type and location where the waste was recovered. The following identified categories of material are covered in this plan and will be managed according to their waste types. Volumes of these types of materials will be difficult to determine due to circumstances associated with the oil spill containment operation and will be updated daily on the ICS 209 form. The attached Disposal Matrix (Attachment A) will be utilized for the disposal of all materials.

A. Liquids

Liquids will be transported to the incident staging/storage areas and held in DOT-approved containers/secure tanks for gauging to determine oil content. All containers, such as frac tanks and roll-off containers will have secondary containment. Oil will be recovered from the tanks to the extent practicable (e.g., extent practicable would be less than 1% oil remaining in the oil/water mixture). Once a waste profile is completed for the remaining impacted oil/water mixture, the impacted oil/water will be transported to an approved waste disposal site. (See Appendix A for state's Impacted Water Transfer Plan).

Additionally, liquids recovered during flushing, steam cleaning and/or decontamination operations should be kept separate from recovered free floating oil and should be transported to an approved waste disposal site following the state's Impacted Water Transfer Plan. (Appendix A).

Copies of all shipping papers, Bills of Lading (BOL) and manifests (non-hazardous or hazardous) will be provided to appropriate regulatory agencies as part of the normal statutory and regulatory submission processes, and as part of their mandatory status and final reporting requirements.

B. Solids

Recovered pollutants contained in solid materials will be placed in roll-off bins or over-pack drums. All roll-off containers will have secondary containment.

Oiled solids (e.g., sorbents, debris, soil, PPE, vegetation, etc.) shall be segregated from non-oiled trash/garbage. A waste profile shall be completed and the impacted oil/water will be transported to an approved waste disposal site. (see Residential Soil and Debris Transfer Plan attached in Appendix B).

C. Wildlife

Dead Wildlife issues, including recovery and transport will be coordinated by the United States Fish and Wildlife Service and/or the authorized and designated impacted State wildlife jurisdictional entity, (insert agency here).

Oiled deceased wildlife removed in the cleanup operation will be bagged in clear bags and should be segregated and set aside for assessment by wildlife experts.*Information must be transferred to the Wildlife Branch regarding the collection of any oiled or un-oiled animal carcasses.

Copies of all shipping papers, Bills of Lading (BOL) and manifests (non-hazardous or hazardous) will be provided to appropriate regulatory agencies as part of the normal statutory and regulatory submission processes, and as part of their mandatory status and final reporting requirements.

D. Non Oil Contaminated General Waste

Waste such as trash collected from response vessels responding to the oil spill event, and material associated with shoreline operation will be disposed of using standard Municipal Waste management practices.

E. Potential Hazardous Waste

Any waste determined to be RCRA hazardous waste will be managed accordingly.

F. Decontamination Site Waste

Decontamination areas will be lined with visqueen and industrial matting that can be disposed of after closure of the decontamination area.

Cleaning systems for skimmers, hand tools, and heavy machinery are established at the decontamination unit, usually in the immediate vicinity of the temporary waste management area established for a spill cleanup effort.

All sheen/product from vessel decontamination will be collected via absorbent pad/boom or trash pump transfer to an DOT approved container, such as a frac tank, roll-off or other for reclamation and proper disposal. All containers, such as frac tanks and roll-off containers will have secondary containment.

Copies of all shipping papers, Bills of Lading (BOL) and manifests (non-hazardous or hazardous) will be provided to appropriate regulatory agencies as part of the normal statutory and regulatory submission processes, and as part of their mandatory status and final reporting requirements.

G. General Guidelines

Clearly identify waste containers. Use a label, inclusive of all pertinent information to clearly identify the contents of containers of hazardous, non-hazardous and inert wastes. All containers, such as frac tanks and roll-off containers will have secondary containment.

Waste streams will be characterized per Section 1 to ensure the wastes are managed in accordance with federal and state hazardous waste regulations. The testing results will determine the final disposition and disposal of the waste.

Wastes accumulated in temporary storage locations will be categorized, segregated, inventoried and transported off-site for recycling or disposal. Temporary storage should not exceed thirty (30) days without the written approval of an extension from (insert agency here).

Temporary storage of oil-contaminated materials will be in labeled, closed-top, 55-gallon drums, sealed plastic bags or roll-off bins, all segregated within the lined containment areas.

Solid waste will be placed in a lined area for subsequent off-site transport, treatment and disposal.

A designated Waste Coordinator will track all manifests and will supply the following documentation to the Documentation Group within the ICS structure:

- A. Copies of Manifests/Bills of Lading
- B. Copies of Waste Profile/Analyticals

H. Best Management Practices

Best Management Practices will be followed to the extent practicable, following all federal and state rules and regulations:

- Each incident staging area will be equipped with a sufficient supply of DOT-approved roll-off and frac containers and with sufficient back-up DOT-approved containers.
- Additional staging areas will be identified and equipped as needed.
- All roll-off containers will have liners, and for extra precaution absorbent material will be placed at the door seams.
- Frac tanks and roll-off containers will have secondary containment. If 55 gallon containers are used, they will also be DOT approved, covered at all times when not in use and have secondary containment. All liquids such as oily water,

decontamination water and stormwater will be managed in frac tanks. Decontamination water will be transported by vacuum trucks/tankers to staged frac tanks.

- Spill Control and Countermeasures Plans are under development for those sites subject to 40 CFR 112.1 and the applicable state regulations that apply _____ (insert state regulations here) _____..
- All containers will be clearly labeled with the appropriate waste stream. Once waste begins to be accumulated within a container, the container shall be labeled with the accumulation start date. The label indicating what is within the container shall remain in place and legible. Once accumulation begins within a container the designated Waste Coordinator shall arrange to have the backup container in place.
- All measures will be taken to ensure that no less than two days worth of containers are available on site for each waste stream. At all times, roll-off containers will be covered (tarp) when not in use. Storage time of roll-off containers (when full) will not exceed state or federal regulatory storage requirements; however waste will be removed as quickly as possible.
- Each staging area will be manned with at least one each of the following people during operating periods:
 - Security Personnel
 - _____ Personnel (or the equivalent)
 - _____ Designated Waste Coordinator

Upon receiving the waste at the waste staging area, the Designated Waste Coordinator will place or supervise the placement of the waste into the appropriate containers. Once a container is considered full, personnel shall ensure that the container is properly covered and labeled for transportation. Transportation shall be arranged by the Designated Waste Coordinator, per the transfer plan (appendices A&B). If the waste is transported under a manifest rather than a Bill of Lading, the manifest shall be signed by _____ personnel or their authorized _____ designees.

Only contracted (designated) clean-up contractor(s) shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

Section II: Characterization of Material

The spilled material will be designated as either hazardous or non-hazardous waste based on the following:
 Review of product Safety Data Sheet-SDS (Appendix C)
 Analytical profile characterization of material

Section III. Waste Staging Areas

The following staging areas are currently identified and may change frequently upon clean-up conditions in the locales needed the most.

Staging/Offloading Area	Shipping Address	Designated Waste Coordinator	Cell #

The currently approved Oil Recovery/ Recycling and disposal locations are identified in ATTACHMENT A in appendices.

Section IV: Interim Storage and Segregation of Material

A. Interim Storage of Solid Material

Refer to the staging/storage areas identified in section III of this plan.

B. Segregation of Waste Streams

The cleanup operation will result in the generation of both solid and liquid wastes. The solid wastes will include the following waste streams: Non-Oily Solid Waste; Oily Soil & Debris; Oily Wood Debris; Oily PPE, Sorbents, Decon

Materials and Plastics; Oily Liner Material and animal carcasses. Liquid wastes will include Recovered Oil & Oily Liquids, Decontamination Liquids and Domestic Sewage.

Solid waste should be segregated into three different categories as it is generated: Oily Waste, Regular Garbage and Animal Carcasses. Specific waste types, the designated waste handler and disposal facility is shown in Attachment A. Waste disposition and recovery will be documented on ICS 209 as shown in the incident-specific plan.

1) Non-Oily Solid Waste

All waste materials must be properly segregated. Special care should be taken not to mix the regular garbage with the oily waste especially at the clean-up sites. Regular garbage will include such items as paper, food, and cardboard. Garbage will be placed in white plastic bags and will be stored separately from the oily waste. A garbage dumpster will be placed at the nearest clean-up staging/storage area for collection of the non-oily solid waste. The dumpster will be clearly labeled "Non-Oily Solid Waste". The garbage will be hauled to an approved facility identified in Section I.

2) Oily Solids: Vegetation, Wood Chips, Debris, and Soil

Oily vegetation, wood chips, debris, and contaminated soil will be collected both by hand and mechanical means. Backhoes and front-end loaders may be used to move contaminated vegetation, wood chips, small debris and/or soil. Oily vegetation and debris will be bagged in clear plastic bags. Contaminated soil, oily vegetation, wood chips, and debris may also be placed into drums or loaded into dump trucks or roll offs lined with visqueen. The bags will be stored in lined rolloffs at staging/storage areas (identified in SECTION VI of this PLAN) until removed by a qualified waste hauler. If clear plastic bags are not available for these oily solids, black plastic bags with red duct tape will be used as an alternative until clear bags are available. The material will then be hauled to an approved facility identified in Section I.

3) Oily Solids: PPE, Sorbents, Decon Materials & Plastics

Oily solid wastes consisting of PPE, sorbent booms, pads, decon materials and assorted plastics will be placed in clear plastic bags at a cleanup site. The bags will be stored in lined rolloffs at staging/storage areas (identified in Section III) until hauled to an approved state storage area or shipped off-site to a final approved destination facility. If clear plastic bags are not available for these oily solids, black plastic bags with red duct tape will be used as an alternative until clear bags are available.

4) Oily Liners and Boom Material

Oily liner generated from the transportation of oily soil & debris and oily boom will be stockpiled at a staging/storage area outlined in the Decontamination Plan. Samples of the oily materials will be collected for analysis as described in Section VIII. The liner will be packaged in super sacks or other appropriate containers as needed. If super sacks are used, they will be secured to a hopper to aid in the packaging process. Oily booms will be transferred into lined roll-on/roll-off containers or an equivalent container.

If there are any free oily liquids on the liners, "Floor-dry", cement or other appropriate material will be used as an absorption and binding agent in the shipping container. The liners will be transported to approved facilities identified in Attachment A.

5) Oily Liquid

Oil and oily liquid will be collected from impacted waters in accordance with the IAP. Oily water will be transferred into truck-mounted totes or transported in vac trucks. The oil will be transported to the nearest staging/storage area for short term storage. The oily liquid will be sampled and analyzed as described in Section VIII. The oily liquids will be transported in DOT approved containers to approved facilities identified in Attachment A.

6) Decontaminated Liquid

Oil-impacted liquid generated during decontamination of personal protective gear, equipment, vessels and vehicles will be collected in the lined containment areas and pumped into a vac-truck. The liquid will be hauled in vac-trucks to an approved disposal facility or to a staging/storage area to be transferred to oily water tanks for transport to an approved disposal facility identified in Attachment A. Additional tankage to handle any excess volume of decontamination liquid generated will be used as necessary.

7) Domestic Sewage

Port-a-potties located at shoreline cleanup areas will be pumped at regular intervals. The sewage collected will be transported to an approved disposal facility identified in Attachment A.

8) Animal Carcasses

Oiled deceased wildlife removed in the cleanup operation will be bagged in clear bags and should be segregated and set aside for assessment by wildlife experts. *Information must be transferred to the Wildlife Branch regarding the collection of any oiled or un-oiled animal carcasses. None of the animal carcasses will be disposed of since it is evidence per the NRDA. The wildlife experts will collect, tag and store the animal carcasses as evidence.

C. Tracking

Appropriate waste bills of lading, manifests and waste tracking forms will be used to track each shipment of waste transported off site. See Appendix B for examples. Each shipment will be assigned a unique number which shall appear on the waste tracking form and the bill of lading or manifest.

D. Decanting

Decanting can only be authorized per Federal On-scene Coordinator (FOSC) and State On-Scene Coordinator (SOSC) direction and approval.

SECTION V: Decontamination

Decontamination zones and procedures are identified in the Incident Decontamination Plan. Decontamination is required of all impacted equipment and personnel, including, but not limited to, impacted vessels, vehicles, reusable equipment and personnel.

Personnel decontamination zones consist of a lined area or decon pool for foot wash, a visqueen area for PPE doffing equipped with lined drums for used PPE, a hand wash station with porta-potty and two attendants.

SECTION VI: Animal Carcasses

Refer to Section IV B-8 for specific animal carcasses handling instructions.

SECTION VII: Areas of Operations

To be determined:

SECTION VIII: Sampling Program

A. Oily Solids

To be determined

B. Oily Liquids or Decontamination Mixture

To be determined

SECTION IX: Transportation

Approved transporters will be used from the staging areas identified in Appendix A to the approved destination facilities identified also in **Appendix A**. All transporters of recovered oil and solid waste generated as a result of the oil spill will be registered solid waste transporters with the _____ (left blank to designate impacted State proper jurisdictional entity).

SECTION X: FINAL DISPOSITION OR DISPOSAL

The ICS 209 form (**Appendix E**) will be used to track the disposition of wastes and recovered product as it relates to this incident. Manifest tracking will be used at each staging area and submitted to and rolled up to one combined at the Incident Command Environmental Unit by the staging area manager.

SECTION XI: HEALTH AND SAFETY CONSIDERATIONS

Health and Safety considerations will be covered under the Site Safety Plan at each of the staging areas. Employees handling waste are HAZWOPER and DOT trained. Employees/responders should adhere to OSHA Chemical Exposure/Hazards/Training/Worker Protection and the General Personal Protective Equipment standards for worker safety. OSHA PPE matrix may be found at : https://www.osha.gov/oilspills/oil_ppematrix.html.

Along with the site safety plans, a detailed decontamination plan addressing the concerns of decontamination and the transfer of this material of a recovered product or waste will be submitted to the Incident Command Environmental Unit by the Decontaminations Unit Leader. Decontamination activities are present at the following staging areas.

_____list_____

Only authorized/contracted clean-up contractor(s)_____list_____ shall be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they shall be immediately turned away by security personnel.

SECTION XII COMMUNITY RELATIONS

Community relations are vital to properly manage any community issues or concerns that arise in connection with handling wastes associated with the on-going incident. The Unified Command will develop a community outreach program, which will provide communities and local governments with information about:

- 1) current and proposed disposal and staging sites;
- 2) a description of the process to evaluate disposal sites; and
- 3) public availability of information throughout the operations (include appropriate website)

Information will be posted at each waste disposal staging area describing operations, potential hazards as it relates to oil spill material, and contact information for further questions. The responsible party will minimize community impacts due to the disposition of wastes by ensuring that disposal facilities are State permitted, and staging areas are also being inspected and permitted by the State to ensure that environmental regulations are being addressed. The responsible party will consider the impacts on traditional environmental justice communities, and address concerns raised within those communities.

ATTACHMENT A: DISPOSAL MATRIX: WASTE TYPES, HANDLERS and DISPOSAL FACILITIES

Matrix (liquid, solid, other)	Haz/Non- Haz or Other	Waste Type/Description of Material (Oil, Debris, Recovered sorbents, etc)	Containers	Waste Handler/ transporter	Disposal Facility	Profile (date completed or pending)

Appendix A: Impacted Water Transfer Plan (Incident specific)

Appendix B: Residential Soil and Debris Transfer Plan (Incident specific)

Appendix C: Safety Data Sheets (Incident specific)

Appendix D: Decontamination Plan (Incident specific)

Appendix E: IS 209 Form:

1. Incident Name		2. Operational Period (Date / Time) From: To: Time of Report		INCIDENT STATUS SUMMARY ICS 209-CG
3. Type of Incident				
<input type="checkbox"/> Oil Spill	<input type="checkbox"/> HAZMAT	<input type="checkbox"/> AMIO		
<input type="checkbox"/> SAR/Major SART	<input type="checkbox"/> SI/Terrorism	<input type="checkbox"/> Natural Disaster		
<input type="checkbox"/> Marine Disaster	<input type="checkbox"/> Civil Disturbance	<input type="checkbox"/> Military Outload		
<input type="checkbox"/> Planned Event	<input type="checkbox"/> Maritime HLS/Prevention	<input type="checkbox"/>		
4. Situation Summary as of Time of Report:				
5. Future Outlook/Goals/Needs/Issues:				
6. Safety Status/Personnel Casualty Summary				
	Since Last Report	Adjustments To Previous Op Period	Total	
Responder Injury				
Responder Death				
Public Missing (Active Search)				
Public Missing (Presumed Lost)				
Public Uninjured				
Public Injured				
Public Dead				
Total Public Involved				
7. Property Damage Summary				
Vessel		\$		
Cargo		\$		
Facility		\$		
Other		\$		
8. Attachments with clarifying information				
<input type="checkbox"/> Oil/HAZMAT	<input type="checkbox"/> SAR/LE	<input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<input type="checkbox"/> Marine Disaster	<input type="checkbox"/> Civil Disturbance	<input type="checkbox"/> Military Outload		