Waste Management Plan

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1.0 Waste Management Plan

Prior to and during completion of the decontamination and deconstruction (D&D) of the SPS Technologies Facility, American Integrated Services, Inc, (AIS) will utilize this internally developed Waste Management Plan (WMP) for the coordination and off-site disposal of the various waste streams to be generated as part of the onsite D&D activities. AIS will comply with OSHA's 1926, Subpart T requirements for the project. The WMP provides procedures for managing the characterization, handling and disposal of construction debris, non-hazardous and hazardous wastes; and, describes the responsibilities and procedures to be implemented by AIS during on-site activities.

The purpose of the WMP is to provide pre-transport and disposal policies and procedures relating to waste including appropriate sampling and analysis and required documentation such as analytical testing, waste characterization, disposal facility compliance, internal waste manifests, labels, and spill response information. For waste that has not already been characterized or for waste which waste disposal profiles have not previously been established, waste will be considered impacted until confirmation analysis or screening is complete and/or as directed by SPS TECHNOLOGIES and/or their appointee. All analyses are to be performed by a State-certified environmental testing laboratory.

2.0 Decommissioning and Decontamination Activities

During the decommissioning and decontamination (D&D) activities at the SPS facility, it is expected that a variety of wastes requiring special handling will be generated. The following are brief descriptions of the types of waste that AIS will encounter during the D&D activities.

2.1 Asbestos Containing Material (ACM)

Weever Consulting will perform a pre-demolition survey to determine whether asbestos containing material (ACM) is present that will need to be removed prior to deconstruction. If ACM is identified, Weever Consulting will tag those items/areas of concern so that the specific ACM's will be abated throughout the building where it is deemed safe to access. For areas of concern outside of the "Safe" cleared zones, AIS will utilize Asbestos trained personnel during the demolition to glove bag and remove ACM prior to loading out construction debris. For these areas, AIS will treat the construction debris as potential cross contaminated materials and handle as Friable Asbestos containing materials. General ACM waste will be double-wrapped and contained in a sealed roll-off container for characterization and proper off-site disposal. Any comingled construction debris shall be placed into a "burrito" wrapped truck and sealed per regulatory requirements prior to disposal offsite.

Non-Friable and friable asbestos will be packaged in transparent, sealed and leak-tight (double) 6 mil bags, drums or cartons containing transparent plastic bags, roll-off bins and "burrito-wrapped" as outlined in DEP Regulations. OSHA regulations require warning labels with letters of sufficient size and contrast as to be readily visible and legible, and shall contain the following information as specified by 29 CFR 1926 requirements:

CAUTION
Contains Asbestos Fibers
Avoid Opening or Breaking Container
Breathing Asbestos is Hazardous to Your Health
or
DANGER
CONTAINS ASBESTOS FIBERS
AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

Leak-tight containers and wrappings of friable and non-friable asbestos will be labeled with the name of the waste generator and the location at which the waste was generated.

- Each leak-tight container(s) of friable asbestos waste must be labeled with a Class 9 label that conforms to DOT regulations and with the proper description of the waste:

  "RQ, NA2212, Asbestos, 9, PG III"

- Each leak-tight container(s) of non-friable asbestos waste must be labeled with a Class 9 label that conforms to DOT regulations and with the proper description of the waste:

  "Non-Hazardous Waste Solid (non-Friable Asbestos)"

Friable and non-friable asbestos waste is to be transported in the subject containers (i.e. drums, cartons, roll-off containers, end-dumps, cube-vans or other non-compacting closed container). Friable and non-Friable ACM waste material will be disposed of at either a hazardous or non-hazardous waste facility, respectively at one of the listed waste disposal facilities presented in Section 3.4 of this Plan.

2.2 Universal / Special Waste Item Removal

2.2.1 Fluorescent Bulbs and HID Lamps

To access fluorescent bulbs and HID lamps, AIS personnel will utilize rolling scaffolding or ladders to support workers on single story floors. For ceilings and outdoor facility lighting of greater height, motorized boom-lifts and/or man-lifts will be utilized to assist in retrieving bulbs and other lighting fixtures. The tubes and lamps will be removed and placed in storage boxes or fiber drums provided by the receiving facility. Containers will be labeled accordingly and temporarily staged in a pre-determined area for eventual off-site disposal. Bulbs and HID Lamps will be transported under Bill-of-Lading or manifest to one of the proposed disposal facilities outlined in Section 3.4.

2.2.2 PCB and Non-PCB Ballasts

All lighting ballasts will be removed and containerized for off-site recycling. Although non-PCB containing ballasts can be considered general construction debris, each ballast contains a small amount of dielectric fluid which should be managed properly through recycling and not shipped

to a local landfill as debris. Ballasts will be staged for eventual off-site recycling and/or disposal at a SPS TECHNOLOGIES-approved disposal facility. Shipping documents (bill of lading or manifest) and labels will be prepared per the recommendation and/or requirement of the receiving disposal facility.

2.2.3 Mercury Containing Items (Thermostats & Mercoid Switches)

If encountered, mercury containing devices will be isolated and the wires clipped or the housing will be dismantled; and, the removed glass ampules will be placed in 2-gallon spill-proof plastic containers with several inches of absorbent media. When personnel have removed all mercury items from the facility, the remaining void space in the container will be filled with absorbent. The lid will then be secured, and the drum labeled with the generator information and proper shipping name. Articles will be staged for eventual off-site recycling and/or disposal at a SPS TECHNOLOGIES-approved disposal facility. Shipping documents (bill of lading or manifest) and labels will be prepared per the recommendation and/or requirement of the receiving disposal facility.

2.2.4 Lead Acid Batteries

Located within the facility are emergency lights stationed at entrance/exit doorways to light escape routes in case of an emergency and/or power outage. The emergency light case houses a lead acid battery(s) that will need to be removed and properly managed prior to destruction of the emergency light housing. The battery to be removed will be located and the housing cover opened for access. The removed battery(ies) will be containerized, labeled accordingly and temporarily staged in a pre-determined waste consolidation area for eventual off-site disposal.

If a battery is found to be cracked, leaking, or if the integrity of the battery is potentially impaired, it will be containerized in designated poly drums or 5-gallon containers and handled accordingly as noted above. All personnel handling lead acid batteries will be outfitted with appropriate safety gear including but not limited to chemical resistant Polyvinyl Chloride (PVC) boots, PVC Tyvek Suits, PVC gloves, and hard hats with goggles and face shield or as specified in the site-specific health and safety plan. Any spills will be neutralized with baking soda and water.

2.2.5 Self-Luminous Exit Signs and/or Smoke Detectors (IF ENCOUNTERED)

All self-luminous self-powered lighted exit signs will be removed and packaged per the manufacturer's recommendation. The unit will be unbolted from the wall. No attempt will be made to open the body of the exit sign and precautions will be taken by personnel to ensure that the sign is not dropped. AIS will trace the current Fire Alarm System prior to demolition to ensure any smoke detectors are removed. Removed devices will be placed into manufacturer-provided boxes suitable for the shipping of the devices. Shipment of these devices will involve the acquisition of a Return Material Authorization (RMA) number provided by the manufacturers. This RMA number is the acceptance and tracking number by the manufacturer. If an item cannot be returned to the manufacturer, it shall be properly packaged and handled as applicable waste.

2.2.6 Electrical Transformers and/or Motor Control Units

Located throughout the facility are various electrical transformers and motor control units. Although some of the units are labeled as "Contains No PCBs", this will be verified. If the items are confirmed as non-PCB containing, the subject unit can be removed and recycled as non-contaminated oil and articles. The analytical report will be provided to the proposed receiving recycling facility as confirmation. If it is discovered that a unit does contain PCB's, then all oils will be removed and placed into applicable containers for offsite disposal. Evacuation of the transformer oil will be conducted by first accessing the fill port opening on the top of the transformer unit and a vacuum truck will be used to remove the oil via vacuum hoses until all residual oil has been removed. The interior of the transformer carcass will then be lightly pressure washed and the resulting rinseate will also be removed via the same truck and transported to one of the proposed State-permitted recycling facilities for recycling/disposal under the proper waste manifesting. Once the transformer has been cleaned, the transformer carcass and supporting conduits will be considered general construction debris and recycled accordingly with other like metallic to a local metal recycling facility(s).

2.2.7 Chemical Storage and Use

Proper chemical storage is as important to safety as proper chemical handling. Often, seemingly logical storage ideas, such as placing chemicals in alphabetical order, may cause incompatible chemicals to be stored together. The AIS HASP addresses these and other concerns to safely use, transfer, label, transport and store chemicals on and off Site.

Training Requirements

All personnel handling, transporting or storing chemicals will be trained in the proper handling, labeling and storage requirements for the type of chemicals being utilized as required in the AIS Hazard Communications Program.

Employee Information and Training

AIS provides employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. Information and training may relate to general classes of hazardous chemicals to the extent appropriate and related to reasonably foreseeable exposures of the job. Chemical-specific information must always be available through labels and safety data sheets.

Information and training shall consist of at least the following topics:

A. AIS employees shall be informed of the requirements of OSHA regarding the proper selection, use, transporting or storing of chemicals as outlined in the AIS HASP.

B. AIS employees shall be informed of any operations in their work area where hazardous chemicals are present.

C. AIS employees shall be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous chemicals and safety data sheets required by this section. The SDSs list for solutions and chemicals typically utilized on AIS Demolition Projects is included within the onsite HASP and a full SDS Binder is available for inspection at the AIS laydown yard.

D. AIS employees shall be trained in the methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.).

E. AIS Employees shall be trained in the physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.

F. AIS employees shall be trained in the details of the hazard communication program developed by AIS, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer and the safety data sheet, and how employees can obtain and use the appropriate hazard information.

G. AIS informs employees of their right:

1. To personally receive information regarding hazardous chemicals to which they may be exposed, according to the provisions of this section;

2. For their physician or collective bargaining agent to receive information regarding hazardous chemicals to which the employee may be exposed according to provisions of this section;

3. Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.

Whenever the employer receives a new or revised safety data sheet, such information shall be provided to employees on a timely basis not to exceed 30 days after receipt, if the new information indicates significantly increased risks to, or measures necessary to protect, employee health as compared to those stated on a safety data sheet previously provided.

General Guidelines

Follow these guidelines for safe chemical storage:

- Read chemical labels and SDSs for specific storage instructions.
- Store chemicals in a well-ventilated area; however, do not store chemicals in a fume hood.
- Maintain an inventory of all chemicals in storage.
- Return chemical containers to their proper storage location after use.
- Store glass chemical containers so that they are unlikely to be broken.
- Store all hazardous chemicals below eye level.
- Never store hazardous chemicals in a public area or corridor.
- Chemicals shall be stored in an area consisting of a secondary containment that has a storage volume 1.5 times more than the total volume of chemicals being stored within.

Separating Hazardous Chemicals

In addition to the guidelines above, there are storage requirements for separating hazardous chemicals. Because an alphabetical storage system may place incompatible chemicals next to each other, group chemicals according to their hazard category (i.e., acids, bases, flammables, etc.).

Follow these guidelines to ensure that hazardous chemicals are stored safely:

- Separate acids from bases. Store these chemicals near floor level.
- Isolate perchloric acid from organic materials. Do not store perchloric acid on a wooden shelf.
- Separate highly toxic chemicals and carcinogens from all other chemicals. This storage location should have a warning label and should be locked.
- Separate acids from flammables.
- Do not keep peroxide-forming chemicals longer than twelve months.
- Do not allow picric acid to dry out.
- If flammables need to be chilled, store them in a laboratory-safe refrigerator, not in a standard refrigerator.
- Flammables should be stored in a flammable storage cabinet.
- Store reactive materials separate from corrosives or flammables.
- Store Nitric acid (reactive and corrosive) separately from other acids and flammables.

Chemical Classifications and Segregation

The following table provides examples of incompatible chemicals:

CHEMICAL	INCOMPATIBLE WITH . . .
Acetic acid	Chromic acid, nitric acid, hydroxyl compounds, ethylene glycol, perchloric acid, peroxides, permanganates
Acetylene	Chlorine, bromine, copper, fluorine, silver, mercury
Acetone	Concentrated nitric and sulfuric acid mixtures
Alkali metals	Water, carbon tetrachloride or other chlorinated hydrocarbons, carbon dioxide, halogens
Ammonia	Mercury, chlorine, calcium hypochlorite, iodine, bromine, hydrofluoric acid
Chlorates	Ammonium salts, acids, powdered metals, sulfur, finely divided organic or combustible materials
Chlorine	Ammonia, acetylene, butadiene, butane, methane, propane (or other petroleum gases), hydrogen, sodium carbide, benzene, finely divided metals, turpentine
Cyanide	Acids
Fluorine	Most other chemicals
Nitrates	Sulfuric acid
Oxygen	Oils, grease, hydrogen, flammable liquids, solids, or gases
Perchloric acid	Acetic anhydride, bismuth and its alloys, alcohol, paper, wood, grease, oils,
Sodium	Carbon tetrachloride, carbon dioxide, water
Sulfides	Acids

Chemical Compatibility Chart

Below is a chart adapted from NFPA regulations which demonstrates how chemicals should be stored by hazard class. This chart is not complete, but it will aid in making decisions about storage. For more complete information please refer to the SDS for the specific chemical.

Group/ Code	Color	Hazard Class	Storage Location	Special Instructions
G	Grey, Green, Orange	General	On shelves or in cabinets	Presents no more than moderate hazard in any of categories. For general chemical storage.
B	Blue	Health Hazard	On shelves or in cabinets	Toxic if inhaled, ingested or absorbed through skin. Store in a secure area.
Y	Yellow	Reactive	On shelves or in cabinets	Reactive & oxidizing reagents. May react violently with air, water or other substances. Store away from flammables or combustibles.
R	Red	Flammable	In flammable storage cabinet	Store in area segregated for flammable reagents.
W	White	Corrosive/ Contact Hazard	*In corrosive storage cabinet	May harm skin, eyes, & mucous membranes. Store away from red, yellow, and blue coded reagents.

*Within this storage group you must segregate acids and bases. In addition, nitric acid is always to be stored alone.

- Storage location should clearly indicate which group/code is stored in that location. Each shelf or cabinet should indicate the color.
- Groups should always be separated by a vertical divider not horizontal divider. (see diagrams below)
- Each chemical container should be clearly labeled by its storage color.
- Ideally liquids should be isolated by secondary containment.

Shelf/Cabinet Diagram 1: Correct

G-Grey Storage	B-Blue Storage	Y-Yellow Storage
G-Grey Storage	B-Blue Storage	Y-Yellow Storage

Shelf/Cabinet Diagram 1: Incorrect

W-White Storage	B-Blue Storage	B-Blue Storage
R-Red Storage	Y-Yellow Storage	Y-Yellow Storage

2.3 Residual Lubricating Oils

During the completion of the work, various types of residual operating fluids (oil), will be removed prior to the Recovery or Demolition of the subject equipment and/or system. AIS will facilitate the removal and proper packaging of these oils in a variety of containers (i.e. drums, totes, bulk tanker) and will coordinate the offsite recycling of the subject waste to a State permitted recycling / disposal facility. During pre-site investigations, any operating fluids would be sampled and analyzed. Based on the analytical data, a determination will be made as to its waste classification and final disposition.

2.4 Residual Contaminated Oils

Process equipment and pits are present throughout the facility that contain used and or contaminated oils from their own process or as a result of the fire water applied to them moving them from other areas within the facility. AIS crews will drain down all secondary containments holding oils as well as applicable pits or reservoirs and steam clean the interiors in their entirety. Rinseate will be collected in containment berms and transferred to a tote or vacuum truck for profiling and disposal by Heritage Environmental Services.

2.5 Lead Paint Chips

All removed Lead Paint Chips (LPC) will be placed directly into 6-mil poly-lined bins or drums. Samples of the LBC will be tested by a State certified laboratory and the report results will be analyzed and used for profiling for disposal purposes. Heritage Environmental Services will transport waste under proper manifest to a State and/or Federal permitted disposal facility.

2.6 Health & Safety PPE Debris

Throughout the project, AIS will be generating personal protective equipment (PPE) and other materials such as visqueen sheeting, rags and filters. These items will be considered non-hazardous solid waste. These items will be placed in designated receptacle(s) destined for off-site disposal to one of the non-hazardous waste disposal facilities listed in Section 3.4 of this Plan. Considered as light-weight debris, AIS may incorporate these items into waste streams that exhibit a higher weight. Where excess amounts of sheeting are utilized, the sheeting will be a stand-alone waste stream and considered non-hazardous waste as listed above. The only exception to this will be PPE utilized in remediation, handling or transfer of Hazardous Materials in which case these materials shall be containerized and labeled according to materials handled and profiled for disposal by Heritage Environmental Services.

2.7 General Construction Debris (C&D)

During the D&D activities, construction debris will be generated during the course of the work. This will include but not be limited to office ceiling tiles, carpeting, wall-board, insulation, plywood, fiberglass, etc. The materials will be properly characterized and sampled as applicable for waste determination and off-site disposal. AIS will coordinate roll-off bin containers and/or high-side dump truck transportation for

this type of waste. AIS will remove all asbestos containing materials per the site survey and containerize for disposal prior to demolition within any area. C&D debris removed will be sampled per the receiving facilities guidelines and a profile generated for review and acceptance by SPS prior to loading materials and disposing. The sampling frequency is based on the accepting facility requirements and shall be performed at a rate of 1 composite grab sample for every 750 tons of debris generated. In the event materials are discovered during demolition that are suspected Asbestos and / or non-typical construction debris, these materials will be segregated, sampled and analyzed to confirm if they are an acceptable waste stream for the designated landfill and profile amended. If deemed not acceptable, SPS will be notified and AIS will resample and profile into an accepted approved landfill for disposal to confirm prior to transportation. All loads will be inspected and covered prior to leaving the site by AIS personnel.

2.8 Scrap Metal Recycling

During the course of the project, AIS will utilize site personnel and equipment to “scrap” all potential ferrous and non-ferrous metals to best achieve the most monetary value for recyclables during the plant demolition activities. As structures, tanks, and piping systems are being demolished, all non-hazardous salvageable components will be consolidated and scheduled for offsite recycling. All shipments and tracking weight tickets will be obtained to ensure any waste diversion requirement are met and properly documented.

2.9 Concrete Recycling

AIS will visually inspect brick and concrete prior to removal for signs of contamination. Any visually impacted brick or concrete that is discovered will be segregated, sampled, and analyzed to confirm if it is acceptable to be recycled. Brick and concrete removed from the plating area will be segregated and managed as RCRA hazardous waste, pending characterization. AIS will recycle all other non-visually impacted brick and concrete that is deemed acceptable by the recycling facility. All concrete will be sized to a 24” x 24” or smaller section with rebar cut flush or to an agreed up size by the recycling facility accepting the material. Loading of the existing concrete will be completed by a rubber-tired or track loader. AIS will maintain dust control during all demolition with a combination of hoses fed from an existing 8” HDPE line installed by AIS surrounding the property, water trucks and portable dust boss machines with atomizing spray tips that produce mist over the area being demolished. AIS will monitor the upwind and downwind areas for each regulated work area for dust and particulate matter. In the event there is an exceedance, work practices will be modified and can include, use of amended water sprayed from airless sprayers, addition of dust suppression equipment, utilizing different equipment to perform the tasks and pausing or stopping work until conditions have improved. Brick and concrete deemed appropriate for recycling will be sent to B Blair Corp DEP permit #09-00216. Brick and concrete that cannot be recycled will be sent to a permitted disposal facility, as identified in Section 3.2. All sampling required for acceptance will be based on the Regulatory Requirement established by the recycling or disposal facility and in accordance with applicable regulations.

Daily load out / haul reports will be completed at the end of each day and presented to SPS for record keeping.

3.0 Waste Analysis Program

The objective of the waste analysis program is to characterize waste materials resulting from the waste generating scenarios to determine the proper waste disposal option. For the SPS project, the characterization and disposal determination for each waste stream shall be conducted in accordance with the plan developed by TRC for those activities.

3.1 Waste Disposal Disposition

When a waste has been characterized, waste determination made and LDRs assessed, the waste disposition will be determined based on selection of a waste profile that corresponds to the waste characteristics or a new waste profile will be generated specific to the subject waste stream. All waste disposal and/or recycling will be documented on an internally prepared Waste Shipment Tracking Log.

3.1.1 Waste Profiles

Waste profiles will be prepared and submitted to SPS TECHNOLOGIES and/or a SPS TECHNOLOGIES appointed representative for approval and then sent with the corresponding data for disposal/recycling facility review and approval. In addition to the waste profile, some hazardous waste is subject to LDRs per 40 CFR 261 that either prohibit the disposal of the waste or require specific treatment prior to disposal. The evaluation of LDRs for all waste materials and waste profiles will be conducted during the characterization and profiling process.

If the waste exceeds the LDR, the receiving disposal facility will take the required steps to treat the waste to comply with the disposal facility's permit to operate. Under no circumstances are wastes that exceed the LDRs to be mixed with other material for the purpose of diluting the waste in order to meet the LDRs. The LDR evaluation will be reflected in the LDR required notification and certification form, approved waste profiles and documented accordingly.

3.2 Proposed Disposal/Recycling Facilities – Alternates to be added if approved by SPS

3.2.1 RCRA Hazardous Waste – Class I

Chemical Waste Management Inc.
36964 Alabama Highway 17 North
Emelle, AL 35459
TSCA EPA ID Permit #ALD000622464

Heritage Thermal "HTS"
1250 Saint George Street
East Liverpool, OH 43920
EPA Permit #OHD980613541

To be Determined Alternate based on Sampling Results

3.2.2 Non-Hazardous Waste / Asbestos – Sub D

Waste Management
1400 Bordentown Road
Morrisville, PA 19067

PA DEP WM Permit #101699

To be Determined Alternate based on Sampling Results

3.2.3 RCRA Fluids Hazardous Waste –

Heritage Thermal HTS"
1250 Saint George Street
East Liverpool, OH 43920
EPA Permit #OHD980613541

Heritage Environmental Services
7901 Morris Street
Indianapolis, IN 46231
EPA Permit #IND093219012

To be Determined Alternate based on Sampling Results

3.2.4 Fluid Recycling (Non- Hazardous)

Kline Services
5 Holland Street
Salunga, PA 17538
PA EDP Permit #101606

To be Determined Alternate based on Sampling Results

3.2.5 Metal Recycling

Absco Metals
2251 Fraley Street
Philadelphia, PA 19137

SIMS Metals
300 Steel Road South
Morrisville, PA 19067

3.2.6 Universal Waste Disposal

Clean Earth
2591 Mitchell Ave
Allentown, PA 18103

3.3 Waste Management Procedures

3.3.1 Management of Containers – Container Selection

During the course of the work, waste will be containerized for eventual off-site disposal at an approved disposal facility. AIS will provide the appropriate new DOT compliant container for all liquid wastes. Containers may include poly sheeting bags, drums, totes, boxes, roll-offs, end-dump style transports, vacuum truck transports, and temporary dewatering bins for bulk waste scheduled for off-site disposal. All bins or roll off trucks carrying hazardous waste shall at a minimum be burrito wrapped and each load covered completely with a tarp prior to leaving the site. A truck inspection will be performed after loading to ensure a full walk around the vehicle has been performed and the truck inspected for any debris or materials on the bed rails, tires or sides and a verification that the load has been properly tarped for travel on the public roadway.

3.3.2 Labeling of Waste

Proper marking and labeling shall be applied by AIS for all hazardous, non-hazardous, and UW waste at the time the waste is placed in the container. Waste that is stored in bulk shall be posted with a sign that bears an appropriate waste label as well as the information required for waste area signs as applicable.

3.4 Staging of Waste Materials

AIS will establish temporary staging areas within the facility for the storage of hazardous, solid, and/or liquid waste. These temporary areas can be located within the active work area for staging prior to off-site transportation. Any staging of hazardous waste will not exceed 90 days as required by 40 CFR 262.

3.4.1 Waste Segregation

The storage of waste in containers must be done to prevent the possibility of incompatible waste being commingled or causing a hazard such as waste reaction and heat generation. AIS shall ensure that non-hazardous waste is not commingled with hazardous waste in order to eliminate the possibility of cross-contamination.

3.4.2 Inspections

AIS shall implement inspection procedures to address potential deficiencies related to the waste storage areas. We shall conduct, at least daily, inspections of the areas designated for container storage, or transfer. AIS shall inspect the area for evidence of deterioration of containers and secondary containment areas. The inspections and the results shall be recorded and retained as part of the site project files.

3.5 Manifests, Records and Transportation

3.5.1 Waste Manifesting

AIS will prepare the required transportation manifests for the subject waste shipment- in accordance with State and Federal requirements. SPS TECHNOLOGIES or appointed signatory will be responsible for the signing of all shipping papers for the transport of non-hazardous/hazardous waste materials. Bill-of-Ladings will be utilized as well for the off-site transportation of recyclables as a tracking mechanism. The BOL is a triplicate document that is utilized for internal purposes only.

3.5.2 Waste Haulers

All haulers will have the appropriate licenses, certifications, and insurance policies as required for waste handling operations. AIS will coordinate all transportation services and the transporters will comply with the established site safety practices and onsite truck routing as well as off-site delivery of the waste to the respective receiving disposal facility. Transportation routing will be followed; however, alternative routes may be utilized as needed due to alternated traffic patterns, freeway closures and/or freeway detours. As applicable, AIS will provide all properly licensed transportation vehicles for the completion of the work. Transporters will be required to provide DOT certifications for transporting non-hazardous and hazardous waste.