INTEGRATED WASTE MANAGEMENT PLAN

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AGENDA

- Purpose and applicability
- Overview of the Integrated Waste Management Plan (IWMP)
- Challenges we encountered.





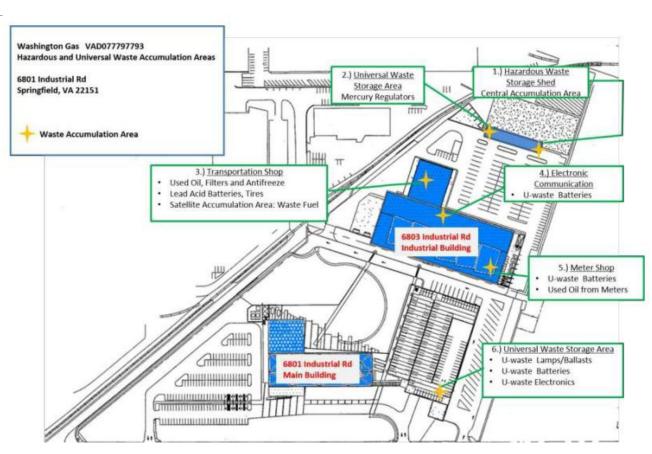
CONTEXT

- Washington Gas manages a wide variety of recyclables, solid waste, and hazardous waste. Waste handling and disposal is regulated by Local, State and Federal requirements.
- Washington Gas personnel handle or manage many types of wastes.
- Personnel who handle and manage wastes must be trained and knowledgeable of regulatory and Company requirements.
- The Environmental Compliance and Affairs Department (ENV) with support from AECOM has prepared an Integrated Waste Management Plan (IWMP).



PURPOSE AND APPLICABILITY OF THE IWMP

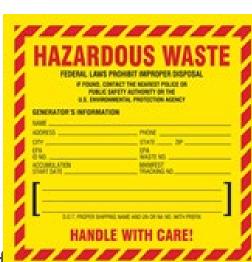
- The purpose of the IWMP is to provide guidance for the handling, transportation, and accumulation / storage of wastes.
- The IWMP is applicable to all parties involved in the generation, transportation, and management of Washington Gas waste.





IWMP OUTLINE

- The Integrated Waste Management Plan provides overall guidance on waste management, including:
 - Identification/classification/determination of wastes generated;
 - Generator status;
 - Accumulation/storage and associated inspections;
 - Transportation and disposal/recycling; and,
- The IWMP also summarizes the federal, state, and District of regulations for hazardous waste, universal waste, used oil, and other waste categories relevant to Washington Gas operations.





IWMP OUTLINE (CONTINUED)

- WG waste generation activities in the field or at facilities
- Roles and responsibilities for waste generation and management
 - Employees
 - Contractors
 - Supply chain
 - Treatment, storage, and disposal facilities
- Waste planning for new engineering projects



IWMP OUTLINE (CONTINUED)

- Other topics covered in detail in the IWMP include:
 - Training requirements
 - Recordkeeping and reporting requirements
 - Waste determination/characterization, including 21 flowcharts for various types of wastes
 - Waste generation in the field and transport to WG facilities
 - Multiple standard operating procedures





IDENTIFICATION OF A WASTE GENERATOR

 Generation rate determination is done <u>each month</u> (not an average for the past 12 months)

Generator Category	Monthly Waste Generation (lbs)	Maximum Waste Inventory/Holding Time
Very small quantity generator (VSQG or <i>MDSQG</i>)	<220	<2200 lbs at any time
Small quantity (SQG)	220-2200	<13,200 lbs, 180 day limit
Large quantity (LQG)	>2200	No limit on amount, 90 day limit
MD Fully regulated (FRG)	>220	No limit on amount, 90 day limit

Note that MD only has two generator categories: very small and fully regulated



EPISODIC WASTE GENERATION

- An episodic event, whether planned (e.g., maintenance, cleanout, demolition) or unplanned (e.g., spill, natural disaster) that does not occur as part of normal operations may cause a SQG or VSQG/MDSQG of hazardous waste to exceed the monthly or total onsite accumulation limit for quantity of waste generated.
- While more regular exceedances of monthly waste quantity may mean a change in generator status is needed, a qualifying episodic event can allow the generator to maintain their SQG or VSQG/MDSQG.





RECORDKEEPING AND REPORTING

Hazardous Waste Recordkeeping (for 3 years)

- Proof of employee training
 - One-time, simplified training for SQGs
 - Annual refresher, more comprehensive training for LQGs
 - DOT hazmat shipping training (and triennial refresher) for those signing hazardous waste manifests
- · Weekly inspection of accumulated hazardous waste containers.
- Monthly generation rate (for VSQG/MDSQG and SQG).
- Signed (generator's and disposer's) copies of the hazardous waste manifest.
- Documentation of arrangements with offsite emergency responders.
- Current hazardous waste contingency plan (LQG).
- Waste analysis and waste profiles.
- Waste shipments from field operations to a WG facility that is an LQG.





RECORDKEEPING AND REPORTING

Exception Reporting

- If WG does not receive a copy of the manifest with the handwritten signature of the TSDF within prescribed period, an exception report must be filed with required information.
- Need to set up a system, such as a calendar reminder for sites that send few manifests or a spreadsheet for sites that send many manifests to track when signed manifests are received from TSDF.





IWMP FLOWCHARTS

- Most flowcharts focus on the logic sequence of waste determination
- Several flowcharts address key issues such as waste transport from the field to a facility.

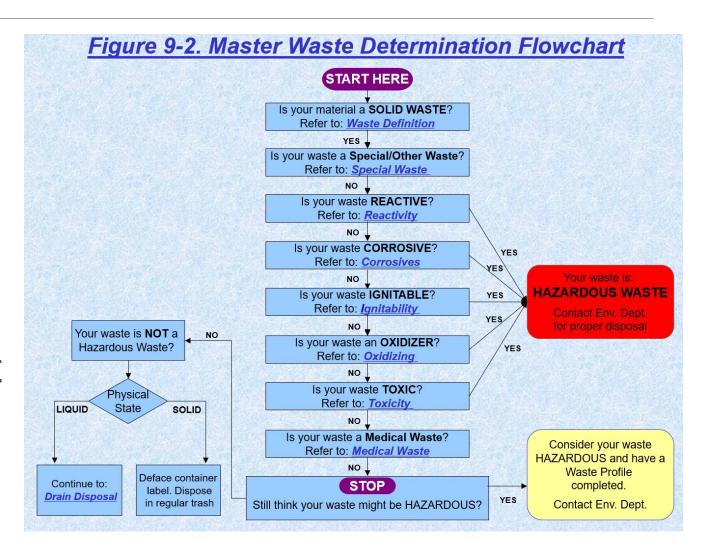


Figure 9-4. Special /Other Waste





QUESTIONS? OPEN DISCUSSION