

# **Waste and Spill Management Specification**



FERC Docket No. CP09-\_\_\_\_-000

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# 1.0 General

This specification shall apply to all work where waste may be generated or a spill may occur.

The Contractor shall attend a pre-job meeting to review environmental issues and requirements relating to the job prior to initiating work activities. During the pre-job meeting, El Paso Corporation (Company) will review the requirements for proper waste management, spill reporting and cleanup. Contractor agrees to comply with the requirements set forth below and in the contract's Scope of Work.

The Contractor shall comply with the current edition of the Company's Environmental Handbook and all applicable federal, state, and local regulations.

Contractor shall be responsible for ensuring that applicable Contractor personnel including subcontractors understand spill prevention procedures and how to handle, store, transport, and dispose of waste per this specification. Contractor shall keep records of training and provide copies of such records to Company upon request.

## **2.0 Waste Management – Company Responsibilities**

### **2.1 Before Work Commences**

For all wastes anticipated to be generated as a result of the Scope of Work, Company shall determine the classification (hazardous, non-hazardous and special waste) of all Company's waste generated by Company or Contractor. Company shall notify Contractor of waste classification.

If waste classification is unknown, Company shall arrange for sampling to determine waste classification as early as possible, but this may occur after work has commenced.

Company shall review and approve the Contractor's Waste Management Plan prior to the pre-job meeting.

Company shall conduct a pre-job meeting to review the Waste Management Plan and responsibilities and review Company authorized personnel and environmental contacts.

Company shall make all required notifications unless otherwise specified in the Scope of Work.

### **2.2 Before Generating Waste**

Company shall inspect all secondary containment provided by the Contractor.

Company shall provide the EPA generator number if necessary for all hazardous waste generated as a result of the performance of the Scope of Work and provide a hazardous waste contingency plan if necessary.

### **2.3 During Waste Generation**

For unanticipated wastes generated during the performance of the Scope of Work, Company and Contractor shall confer on classification responsibilities as soon as possible after the waste is generated. Company shall obtain a temporary hazardous waste EPA ID number if necessary.

### **2.4 After Waste Generation**

Company shall arrange for transportation and disposal of all hazardous and special wastes generated during the performance of the Scope of Work.

## **3.0 Waste Management – Contractor Responsibilities**

### **3.1 Before Work Commences**

Contractor shall develop a Waste Management Plan for all wastes anticipated during the project and submit to Company for approval. At the discretion of the Company, multiple similar projects may be covered under one Waste Management Plan. The work shall not commence prior to obtaining Company's approval of Waste Management Plan. If the Waste Management Plan addresses potentially hazardous waste or asbestos, the Contractor shall have training in accordance with Contractor's own training program.

Contractor shall minimize the waste generated during a project by purchasing and using only the amount of material needed. All excess materials purchased by a Contractor shall be removed by the Contractor at the end of the project.

Contractor shall furnish to the Company copies of any permits, clearances or authorizations obtained by Contractor.

### **3.2 Before Generating Waste**

Contractor shall be familiar with the state and local environmental requirements as necessary for the performance of the Scope of Work.

Contractor shall provide all drums (DOT Spec. 1A1 or 1A2), rolloff boxes, or other containers necessary to contain wastes generated during the performance of work, including wastes generated in response to spill response and cleanup activities, unless otherwise specified in the Scope of Work. All containers shall be approved by the Company.

Contractor shall provide containment areas for liquids, hazardous waste and special waste as required by the Spill Management section of this specification. The containment shall be impervious to the materials being stored. Temporary storage on the right-of-way does not require protection from weather; temporary storage shall not exceed one week.

Contractor shall collect all waste near the close of each workday and shall place the waste in a Company-approved location.

### **3.3 During Waste Generation**

Contractor shall be responsible for housekeeping activities in the work area.

Contractor shall notify the Company prior to placing any potentially hazardous or special waste in storage so that Company may conduct sampling and analysis as necessary.

Contractor shall be responsible for proper packaging, labeling, marking and storing of waste.

Contractor shall keep hazardous, non-hazardous, special, and general trash wastes separate and shall not mix waste streams.

Contractor shall keep a waste log identifying the Company facility at which the waste was generated, the volume and type of waste generated, the date generated and, where applicable, the Company-approved location to which the waste was transported or stored. Contractor shall provide the waste log to the Authorized Company Representative weekly. Any waste shipped to a Company facility shall be accompanied by a log.

For unanticipated wastes generated during the Scope of Work, Company and Contractor shall confer on classification responsibilities as soon as possible after the waste is generated.

If classification of a waste is unknown, all waste shall be assumed to be hazardous until final classification is received from the Company. Contractor shall label and store waste accordingly.

In accordance with the Contractor's approved Waste Management Plan, the Contractor shall be responsible for the handling, storing and transporting of non-hazardous and special wastes generated by Contractor during the performance of the contract.

Any proposed changes to the approved Waste Management Plan regarding the methods established for the handling, collecting, transporting, and storing of any waste shall be submitted in writing and agreed to by both the Contractor and Company prior to instituting the change.

### **3.4 After Waste Generation**

Contractor shall notify Company personnel prior to moving any waste off-site to another location.

Contractor shall be responsible for ensuring that non-hazardous and special wastes are transported by Company-authorized transporters only, and all waste is accompanied by the

appropriate shipping papers, complete with required information and signatures. **Contractor is prohibited from transporting hazardous waste unless specifically authorized.**

Contractor shall submit all waste shipping papers to the Company.

Contractor shall supply disposal containers for the general trash waste generated by the Contractor and its subcontractor; it shall be transported to a disposal facility in accordance with the Waste Management Plan.

## **4.0 Spill Management – Company Responsibilities**

Company shall review spill prevention and response as part of the pre-job meetings as discussed above.

In the event of a reportable spill or release which involve Company-processed products/materials (e.g. pipeline liquids, used oil, etc.), Company shall make notifications to the appropriate agency.

Company shall provide a copy of release reports required by Federal or State agencies to any jurisdictional land-managing agency, concurrent with the filing of reports to the involved Federal and State agencies.

## **5.0 Spill Management – Contractor Responsibilities**

The Contractor shall comply with the spill prevention, control, and containment procedures set forth below and in the Scope of Work for all work undertaken during performance of the contract.

Contractor shall ensure that their personnel and subcontractors involved in the work area are aware of the spill prevention and containment responsibilities.

Contractor shall develop a list of all emergency contacts within the Contractor's and subcontractors' organization, and a description of emergency response equipment that will be provided by the Contractor for use by their employees. Emergency equipment may include but is not limited to shovels, backhoes, dozers, front end loader, etc.

Contractor shall have a copy of the Material Safety Data Sheet (MSDS) of each chemical to be used during the job and it shall be available for review if requested by the Company.

## **6.0 Spill Prevention – Contractor Responsibilities**

Contractor shall install lined secondary containment impervious to the material being stored (e.g., diking and/or earthen berms with liner) around liquids materials handling and storage areas to prevent spilled material from reaching the waters of the state. Areas which require containment structures include: (i) liquid and hazardous waste drum storage areas, (ii) bulk storage tanks, (iii) tanker trucks if parked at one location for more than two days, (iv) liquids handling and operations areas on offshore facilities. All equipment staging areas shall be located at least 50 feet away from all water sources and wetland areas. No storage areas shall be located within 100 feet of a perennial stream. No chemicals or fuel shall be transferred within 100 feet of stream banks. The contractor shall install drip pans or other suitable containment devices to collect all vehicle fluids when performing on-site maintenance. All waste fluids shall be removed from the site by Contractor and disposed of properly.

Contractor shall inspect equipment for integrity including, but not limited to, valves, hoses and fittings. Contractor shall monitor all loading and unloading operations of chemicals and fuels to ensure proper response to prevent spills. All hose connections shall be inspected for leaks and if leakage should occur, the operation should cease until the leak is repaired or a containment pan is placed under the leaking connection.

## 7.0 Spill Response - Contractor Responsibilities

Contractor shall provide immediate notice to the Company's Authorized Representative in the event of a spill or other emergency. All spills occurring on land or in watercourses (including intermittent and ephemeral streams), regardless of quantity, shall be cleaned up immediately.

If a release or spill occurs, Contractor shall stop operations and take immediate measures to control the release and prevent dispersal of the spilled material. For spills to land (e.g. spills in drum storage areas, spills at bulk storage tank areas, spill at truck staging areas, equipment failure or leaks, etc.), Contractor shall initiate cleanup of the area affected by the spill by removing the soil and placing it into new or reconditioned DOT Spec. 1A2/Z150/S drums, or other suitable containers, as determined appropriate by Company. The Contractor shall be deemed the generator of the waste resulting from the spill. The Contractor shall excavate and remediate the area of the spilled material. For spills that enter water, Contractor shall contain the spill and remove the spilled material to the extent practicable using pumps or absorbent materials.

With the exception of spills/releases which involve Company-processed products/materials (e.g. pipeline liquids, used oil, etc.), Contractor shall be responsible for making any necessary notifications to the appropriate Federal or State agencies for any release or spill of hazardous substances in excess of reportable quantities established by 40 CFR 117, 40 CFR 302, and 40 CFR 355 or releases of oil as defined by 40 CFR 110, which occurs as a result of Contractor's or its subcontractors' activities.

Contractor shall document and record all spills. Copies of the documentation shall be provided to the Company's Authorized Representative.

# **A El Paso Pipelines Waste Management Plan Template**

## El Paso Pipelines Waste Management Plan Template

<b>Project Name</b>		<b>Project ID:</b>	<b>Date:</b>
<b>Brief Description of Project:</b>			
<b>Facility/Station:</b>	<b>Division/Area:</b>	<b>Line # (O&amp;M):</b>	
<b>EPA ID #:</b> _____			
<b>Contractor Name:</b> _____			
<b>Subcontractor Name:</b> _____			
<b>Contractor Representative:</b> _____		<b>Cell Phone No.:</b> _____	
<b>On-Site El Paso Representative:</b> _____		<b>Phone No.:</b> _____	
<b>El Paso Project Coordinator:</b> _____		<b>Phone No.:</b> _____	
<b>El Paso Waste Coordinator:</b> _____		<b>Phone No.:</b> _____	
<b>Approved By:</b> _____		<b>Date:</b> _____	
<i>El Paso Environmental Representative</i>			

**Objective**

Contractor/Central Maintenance/Roving Crew shall list all waste streams expected to be generated and proposed plans for handling, storage, and disposal of each waste stream. The plan shall include wastes generated during work performed by subcontractors, and must be reviewed and approved (signed) by the El Paso Environmental Representative prior to the commencement of any work.

**Instructions**

1. Review project scope and check all appropriate waste streams (including wastes generated by subcontractor) listed in Attachment A.
2. For each waste stream checked in Attachment A, complete the associated Details information on Attachment B.
3. Provide original copies of manifests, bill of lading, and related waste documents to the On-Site El Paso Representative listed above.
4. Contact the Environmental Department if unanticipated waste is generated and modify Waste Management Plan to include new waste.

**Contractor/Central Maintenance/Roving Crew Responsibilities**

1. Implement the completed Waste Management Plan and appropriate Company guidelines/procedures when handling, storing, labeling, transporting, and disposing of waste. Refer to the current edition of the El Paso Pipeline Group’s Environmental Handbook for more information. Contact the **El Paso Project Coordinator** with any project specific questions.
2. Maintain onsite Material Safety Data Sheets for **hazardous chemicals** used on the jobsite.
3. Inspect equipment to minimize releases to the environment.
4. Keep waste storage segregated (hazardous, non-hazardous, domestic, universal, etc.) – do not mix different wastes.
5. Inspect waste storage area to ensure that containers are properly closed, labeled, and stored.
6. Keep emergency and spill equipment (as needed) at the jobsite.
7. Communicate the status of all actual or potential non-compliance activities to the **On-Site El Paso Representative**.
8. Report all spills and agency inspections to the **On-Site El Paso Representative**.
9. Minimize waste generated during the project by purchasing and using only the amount of material needed.

**ATTACHMENT A**

**WASTE STREAMS**

**Asbestos Containing Materials**

- Ceiling tile repair/removal
- Floor tile repair/removal
- Gaskets
- Insulation
- Pipe coating
- Roofing tiles and siding.
- Transite
- Other: \_\_\_\_\_

**Abrasive Blasting Waste**

- Blasting bare pipe
- Feathering in fusion bonded epoxy
- After removal of pipe coating
- Blasting painted pipe **(PHW)\***

**Contaminated Soil**

- Hydrocarbon contaminated soil/gravel  
(specify source): \_\_\_\_\_
- Mercury contaminated soil
- Soil from cleanup of spill  
(specify contaminant): \_\_\_\_\_
- Soil from cleanup of Glycol/Ambitrol spill
- Soil impacted with other historical containments  
(specify contaminant): \_\_\_\_\_

**Empty Containers**

- Aerosol cans
- Empty drums/baskets
- Other: \_\_\_\_\_

**Equipment, Tank or Facility Cleanout Waste (PHW)\***

- Sludge/bottoms from cleanout of basement or sump
- Sludge/bottoms from cleanout of separator
- Sludge/bottoms from cleanout of scrubber
- Sludge/bottoms from tank cleanout: Source: \_\_\_\_\_
- Meter run cleanout: Chemicals/solvents: \_\_\_\_\_
- Other equipment cleanout: \_\_\_\_\_

**Filters**

- Air filters/oil filters
- Scrubber filters **(PHW)\***
- Other filters (describe): \_\_\_\_\_

**Oily Debris**

- Oil stained cardboard
- Oily rags
- Oil absorbent used to clean up spill: \_\_\_\_\_
- Other oily debris: \_\_\_\_\_

**Oily Liquids**

- Used oil
- Hydraulic oil
- Scrubber liquids
- Distillate/condensate/pipeline drip
- Other oily liquids: \_\_\_\_\_

**Painting Waste**

- Old paint/coatings **(PHW)\***
- Paint brushes
- Solvents used to clean all paint equipment **(PHW)\***
- Other: \_\_\_\_\_

**PCB Waste**

- Air Systems
- Pipe coating (asphaltic-based)
- PCB impacted soils
- PCB oil/liquids
- Other: \_\_\_\_\_

**Pigging Waste**

- Pigging sludge **(PHW/PE&P)\***
- Pigging liquids **(PHW\* if not recyclable)**
- Used pigs
- Wash water from cleaning pigs or catch basins
- Other:

**\*HW = Hazardous Waste**

**\*PHW = Potentially Hazardous Waste**

**\*PE&P = Potentially Exploration & Production Waste**

**WASTE STREAMS**

**General Trash**

- Plastics, Paper, wood, uncontaminated cardboard/rubber/cloth, wood packing materials, food wastes, aluminum cans/foil, glass, incandescent light bulbs, other waste similar to domestic waste

**Scrap Metal, Piping, Equipment**

- Scrap metal with no coating
- Scrap metal with coating
- Scrap metal with potential NORM
- Equipment/vessels
- Other: \_\_\_\_\_

**Spent Solvents**

- Used cleaning solvents **(PHW)\***: \_\_\_\_\_
- Other spent solvents **(PHW)\***: \_\_\_\_\_

**Wastewater**

- Glycol liquids
- Hydrostatic test water
- Oil/water liquids in pipeline when pipe is cut in trench
- Produced water
- Scrubber liquids
- Turbine/Engine wash water
- Heater water
- Other wash water: \_\_\_\_\_

**Other Debris**

- Asphalt
- Cleared Vegetation
- Casing filler
- Cement
- Coke breeze
- Concrete without contaminants
- Contaminated concrete (e.g. oil, PCBs)  
List possible contaminants: \_\_\_\_\_
- Drilling mud
- Lumber
- Non-asbestos insulation
- Pipe coating (non-asbestos, non-PCB)
- Other: \_\_\_\_\_

**Other Waste** (List other waste not identified previously)

- Batteries (describe): \_\_\_\_\_
- CPS rectifier
- Fluorescent light bulbs
- Lead acetate/rubicon tape **(PHW)\***
- Mercury containing equipment (switches etc.)
- Electronic equipment (circuit boards, transformers, etc.)  
Describe: \_\_\_\_\_
- Creosote-coated wood products **(PHW)\***
- Personal Protective Equipment/rags **(PHW)\***  
Describe source: \_\_\_\_\_
- Pesticides: \_\_\_\_\_
- Insecticides: \_\_\_\_\_
- Fertilizers: \_\_\_\_\_
- Other waste: \_\_\_\_\_

**\*HW = Hazardous Waste**

**\*PHW = Potentially Hazardous Waste**

**\*PE&P = Potentially Exploration & Production Waste**

**ATTACHMENT B  
WASTE MANAGEMENT PLAN DETAILS**

Waste Stream Name: _____	Estimated Volume/Weight/ # of Containers: _____	<p align="center"><b>Handling, Storage, Disposal</b></p> <ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements:</li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues:                      _____</li> </ul>
<input type="checkbox"/> Known HW <input type="checkbox"/> PHW <input type="checkbox"/> PE&P <input type="checkbox"/> Non-HW <input type="checkbox"/> Special <input type="checkbox"/> Unknown	<p align="center"><b>Sampling Required?</b></p> <input type="checkbox"/> Yes <input type="checkbox"/> No	

Waste Stream Name: _____	Estimated Volume/Weight/ # of Containers: _____	<p align="center"><b>Handling, Storage, Disposal</b></p> <ul style="list-style-type: none"> <li>• Responsible for managing waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Responsible for storing/labeling waste: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Waste storage container type:</li> <li>• Labeling requirements:</li> <li>• Responsible to transport waste from site to secure storage site:                      (<i>obtain permission from El Paso facility before storage at a company location</i>)  <input type="checkbox"/> Company <input type="checkbox"/> Contractor <input type="checkbox"/> N/A <input type="checkbox"/> Do Not Transport offsite for storage</li> <li>• Transporter company name:</li> <li>• Waste storage secure location:</li> <li>• Storage site weekly inspections required? <input type="checkbox"/> Yes <input type="checkbox"/> No</li> <li>• Responsible to coordinate disposal: <input type="checkbox"/> Company <input type="checkbox"/> Contractor</li> <li>• Transporter company name:</li> <li>• Final disposal site (if known):</li> <li>• Any Special Issues:                      _____</li> </ul>
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