



**Application of Tennessee Gas Pipeline Company for  
a Certificate of Public Convenience and Necessity**

**FERC Docket No. PF09-1**

**300 LINE PROJECT**  
**Pennsylvania and New Jersey**

**VOLUME IIA – APPENDIX F**  
**WASTE MANAGEMENT PLAN**

**MARCH 2009**

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# DRAFT WASTE MANAGEMENT PLAN

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## WASTE MANAGEMENT PLAN

The following information is to be used as a contractor's guidance tool when generating wastes on a project and to assist the contractor in developing a waste management plan, which must be submitted to the company before the project begins.

### 1. Waste Identification and Characterization

#### 1.1 Identifying Wastes

Wastes may be grouped into four categories, each requiring different forms of disposal: hazardous waste, non-hazardous waste, special waste, and universal waste.

- **Hazardous wastes** - Wastes that meet one of the criteria of ignitable, corrosive, reactive, toxic, or is specifically listed as hazardous waste by regulation. These wastes require special handling and disposal.
- **Non-hazardous wastes** - Wastes that do not fall into the other categories. This includes general trash.
- **Special wastes** - Wastes that do not meet the criteria for hazardous wastes, but may present special hazards or require special handling. Examples of special wastes are asbestos, polychlorinated biphenyls ("PCBs"), radioactive waste, and naturally occurring radioactive material ("NORM"). It's important to note that some states have their own classification of special wastes.
- **Universal wastes** - To reduce the amount of hazardous waste in municipal solid waste streams, the Environmental Protection Agency ("EPA") and many states recognize batteries, thermostats and lamps, e.g., fluorescent light bulbs, as "universal" and thus allow easier handling of these wastes.

#### 1.2 Waste Characterization

The Environmental Inspector ("EI") shall coordinate with the Field Environmental Representative and/or Compressor Station personnel to determine if existing waste profiles exist for wastes generated during construction. These locations maintain waste profiles that list the characterization results of various wastes. If the classification of a waste is unknown, the waste must be characterized using test results or knowledge of the process generating the waste to determine the proper handling requirements for that waste. The EI shall coordinate with the Field Environmental Representative and Contractor to determine the type of waste and the party responsible for proper disposal. The information below is used to characterize a waste.

- Source of the waste.
- Material Safety Data Sheets ("MSDS") for materials comprising the waste.

- Laboratory results from waste testing, as applicable.

Contact the Field Environmental Representative for waste characterization and sampling instructions if no existing waste profile exists.

Prior to waste characterization a number of general guidelines shall also be adhered to when handling or storing wastes.

- Ensure that the Contractor's Environmental Guidelines in the contract are followed.
- Ensure that the Contractor provides a list to the EI of all hazardous materials or potential contaminants that are to be used or stored on the project site.
- DO NOT bury any waste with the exception of stumps, rocks, or boulders as approved within the FERC's Plan and Procedures.
- Never mix any waste awaiting characterization with other wastes.
- Never ship any waste unless it has been characterized.
- Never ship any hazardous waste from the job site to a compressor station without prior approval from the Field Environmental Representative and compressor station.
- Ship wastes along with the required manifests only to company-approved facilities.
- Never ship drums of waste to a compressor station without prior approval from the Field Environmental Representative and the compressor station.

## 2. Waste Types

### 2.1 Hazardous Waste

Common wastes include, but are not limited to: pipeline sludge, spent pigs, sandblast abrasive (depending on type and use), paint thinner, and solvents.

The following procedures apply to storage of waste determined to be hazardous for all classes of generators:

- Store hazardous wastes using the Department of Transportation ("DOT") approved containers, a frac tank (bulk liquid wastes), a covered steel roll-off container with a poly-liner (bulk solid wastes like contaminated soil), or on a

thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes).

- When using DOT-approved containers, be sure the containers are kept closed or sealed (except when waste is being added), maintained in good condition (not damaged, leaking or corroded) and store compatible substances that will not react with the hazardous waste. For example, store acidic wastes in plastic or plastic-lined containers rather than steel containers.
- Label hazardous waste containers (drums, tanks, roll-off containers) with a hazardous waste label as soon as any hazardous waste is placed into the container. Use a waterproof pen to complete the following information on the label:
  - o Generator name, address, and phone number.
  - o Generator EPA identification number.
  - o Description of waste (contact the Field Environmental Representative to obtain a waste description).
  - o The 4-digit EPA waste code (the Field Environmental Representative will provide EPA waste codes).
  - o Accumulation date (the date the waste was added to the container, if not from satellite storage, or the date it was brought to the waste storage area from a satellite accumulation area).
- Label waste piles with a weatherproof sign identifying the waste and the date the waste pile was started. Waste piles are to be placed on poly-liner, covered to protect them from weather, and surround with barricade tape.
- Store hazardous waste in a designated hazardous waste storage area (or in a designated satellite accumulation area) that is covered or protected from the weather; has an impermeable floor, surrounded by curbing or use spill pallets; and is more than 50 feet away from the facility property line if ignitable or reactive hazardous waste is stored in the area.

Manage the hazardous waste storage areas as follows:

- Identify as hazardous and non-hazardous waste appropriately.
- Arrange the containers by waste type, keeping similar hazardous wastes together.
- Separate any incompatible waste by a dike, berm, wall, or other containment device.
- Turn containers so labels may be read easily and ensure that enough aisle space is left between drums to inspect for leaks and to gain access to respond to spills or fire.

- Handle waste containers carefully to prevent rupture or leaks, and protect containers from extreme temperatures.
- Large Quantity Generators and in some states Small Quantity Generators must have a contingency plan, make weekly inspections of hazardous wastes, and provide specific training to personnel.
- Hazardous waste can only be disposed at approved facilities. Contact the Field Environmental Representative for a list of approved facilities.

## **2.2 Non-Hazardous Waste**

Common wastes include, but are not limited to: oily rock/soil, oily rags, sandblast abrasive (depending on type and use), and general trash/garbage.

- Turn containers so labels may be read easily.
- Non-hazardous waste is waste that has not been found to be hazardous through testing or by generator knowledge but has special transportation and disposal requirements, which may include State permitting and approvals.
- Store non-hazardous wastes using one of the following methods:
  - In DOT-approved containers.
  - In a frac tank (bulk liquid wastes).
  - In a covered steel roll-off container with a poly-liner (e.g., bulk solid wastes like contaminated soil or used sandblasting abrasive).
  - On a thick poly-liner and provide the area with a poly-liner cover and temporary containment berm (bulk solid wastes).
- When using DOT-approved containers, be sure the containers are:
  - Kept closed or sealed (except when waste is being added).
  - In good condition (not damaged, leaking or corroded).
- Label non-hazardous waste containers (drums, tanks, roll-off containers) with a non-hazardous waste label identifying the contents as soon as waste is placed into the container.
- Store non-hazardous waste segregated from hazardous waste storage or satellite accumulation areas.
- Non-hazardous waste can only be disposed at approved facilities. Contact the Field Environmental Representative for a list of approved facilities.

Some States allow sandblast sand to be left in the ditch if sandblasting bare pipe only. Contact the Project Environmental Coordinator to verify if this type of activity may occur.

### **2.3 Special Waste (Asbestos & PCB)**

Common wastes include, but are not limited to: asbestos or asbestos containing material (“ACM”) and PCBs.

#### ***2.3.1 Asbestos/ACM***

**Check with the Project Environmental Coordinator to determine if there are any additional state-specific requirements that may apply.**

- Store in double, six-mil thick plastic bags, or single bags in DOT approved drums.
- When placing asbestos into waste containers, do the following:
  - o Make sure that the asbestos is thoroughly wet before closing the container for the final time.
  - o Gloves and other solids can be added before sealing.
  - o Seal all containers by securing the drum lids or by wrapping the neck of plastic bags with duct tape.
  - o Store containers in an area where the waste is secure and not easily disturbed.
  - o For accumulation containers, each item must be individually wrapped and placed in drum.
- Mark or label the container with the information indicated below:
  - o The letters “RQ” for reportable quantity, if the waste contains one pound or more of friable asbestos.
  - o The word “Waste”.
  - o The word “Asbestos” and the identification number for asbestos “NA2212”.
  - o The facility name and address.
  - o A warning label stating “DANGER; CONTAINS ASBESTOS FIBERS; AVOID CREATING DUST; CANCER AND LUNG DISEASE HAZARD”.
- Ship asbestos waste to a Company-approved disposal facility. Contact the Field Environmental Representative for a list of approved facilities.
- Pipe coated with non-friable asbestos can be sold and transported to a scrap dealer or individual buyer. Written notification to the dealer or buyer must include a disclosure and release document that indicates that the pipe is coated with an

asbestos-containing material. El Paso has a specific document for this purpose that contains the appropriate language. Contact the Field Environmental Representative for details on transferring pipe coated with non-friable asbestos.

- Do the following when preparing sections of pipe coated with friable asbestos-containing material for transportation to a Company-approved disposal facility:
  - o Pipe joints must be less than 40 feet long for transportation by trailer (also verify whether or not a specific pipe length is required by the disposal company).
  - o Pipe joints must be less than 20 feet long for transportation in a roll-off box.
  - o Wrap ends of pipe with polyvinyl and duct tape or place in sealed roll-off container.
  - o A manifest is required for transportation to a disposal facility.
  - o Provide State environmental or health department registration, if applicable.
- Use either Company vehicles or contract vehicles that meet DOT requirements to transport asbestos waste. If the amount of asbestos-containing material being transported is 1,000 pounds or more, a commercial drivers license with hazardous materials endorsement is required.
- Ensure that the vehicle transporting regulated asbestos-containing material (friable) from the facility is marked with signs warning of asbestos danger while the vehicle is being loaded or unloaded. The sign should read “DANGER; ASBESTOS DUST HAZARD; CANCER AND LUNG DISEASE HAZARD; AUTHORIZED PERSONNEL ONLY”.
- Inspect all containers before and after unloading/loading to ensure:
  - o All drum tops are secured.
  - o Duct tape has been placed around the necks of all bags and there are no punctures. Place additional bags over the outside of any punctured bags and secure the necks of the new bags with duct tape.
  - o All containers are properly labeled.
- The type of shipping papers required depends on the State. A waste shipping record must be completed for each shipment. Check with the Project Environmental Coordinator to determine if there are any additional state-specific requirements that may apply.
- Make sure shipping papers are completed as follows:

- o Check the “RQ” column on the shipping paper or mark “RQ” before the shipping name if the shipment contains one pound or more of friable asbestos.
  - o DOT shipping name is “Waste Asbestos” or, if the asbestos waste is mixed with a binder, filler, or other material, “Waste Asbestos Mixture”.
  - o Hazard Class Identification Number is “Class 9”.
  - o North American Identification Number is “NA2212”.
  - o Packing group is “PG III”.
- Never dispose of asbestos-containing wastes by placing it in a container with other trash, by burying, using as fill material, or leaving in a pipe excavation ditch.
  - Dispose of asbestos-containing wastes as soon as practical at a disposal facility that is permitted to accept asbestos. Contact the Field Environmental Representative for a list of approved disposal sites for asbestos-containing wastes.

### 2.3.2 PCB Waste

In some states, PCB wastes are hazardous wastes and all hazardous waste requirements must be followed in addition to those listed in this procedure. **Check with the Project Environmental Coordinator to determine if there are any additional state-specific requirements that may apply.**

- PCB wastes may be stored for 30 days without any special storage requirements.
- PCB wastes may be stored up to one year within an EPA-defined storage area. Contact the Project Environmental Coordinator for assistance on setting up a PCB waste storage area.
- As a minimum, store liquid PCB wastes in DOT-approved containers or on pallets with containment designed to capture any drips or leaks.
- Protect storage containers or equipment from weather.
- Mark PCB wastes with the proper PCB label before being placed into storage. The basic PCB label is 6”x6”, white or yellow, which can be reduced as small as 2”x2”.
- Mark all PCB wastes with the date that the item was removed from service or the date that the waste was generated and enter this information on the PCB waste log. Mark the storage area with a sign.

- Company vehicles can only be used to transport PCB wastes from a Company location where the waste was generated to another Company location where the waste will be stored. Placards are required if transporting:
  - o More than 99.4 pounds of PCB waste in containers
  - o One or more PCB transformers with 500 ppm or more PCBs.
- Check containers before and after loading to make sure that they are in good condition, are not leaking, and that all covers are secured.
- A hazardous waste manifest must accompany each shipment of PCB waste.
- Contact the Project Environmental Coordinator for a list of Company approved PCB disposal facilities. Dispose all PCB wastes at an approved facility.
- Once the PCB waste has been shipped to an approved disposal facility, the owner or operator of the disposal facility shall send the manifest and acknowledgement of receipt to the generator identified on the manifest which accompanied the shipment of PCB waste within 30 days of the date the disposal facility received the waste. If an acknowledgement of receipt is not received with the manifest, the generator shall confirm by telephone by the close of business that the disposal facility received the manifested waste and document the acknowledgement in the PCB log. The disposal facility should also send a Certificate of Disposal within 30 days of actual disposal of the waste.

#### **2.4 Universal Waste**

Common wastes include, but are not limited to: batteries, thermostats, and fluorescent light bulbs.

- If any universal waste is generated during construction, contact the Field Environmental Representative for storage and disposal instructions.