



1.6 Waste Management

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Applicability and Approach

These guidelines apply to projects that generate, store, or handle any quantity of waste across a range of industry sectors. It is not intended to apply to projects or facilities where the primary business is the collection, transportation, treatment, or disposal of wastes. Specific guidance for these types of facilities is presented in the Environmental Health and Safety (EHS) Guidelines for Waste Management Facilities.

A *waste* is any solid, liquid, or contained gaseous material that is being discarded by disposal, recycling, burning or incineration. It can be byproduct of a manufacturing process or an obsolete commercial product that can no longer be used for intended purpose and requires disposal.

Solid (non-hazardous) wastes generally include any garbage, refuse. Examples of such waste include domestic trash and garbage; inert construction / demolition materials; refuse, such as metal scrap and empty containers (except those previously used to contain hazardous materials which should, in principle, be managed as a hazardous waste); and

residual waste from industrial operations, such as boiler slag, clinker, and fly ash.

Hazardous waste shares the properties of a hazardous material (e.g. ignitability, corrosivity, reactivity, or toxicity), or other physical, chemical, or biological characteristics that may pose a potential risk to human health or the environment if improperly managed. Wastes may also be defined as “hazardous” by local regulations or international conventions, based on the origin of the waste and its inclusion on hazardous waste lists, or based on its characteristics.

Sludge from a waste treatment plant, water supply treatment plant, or air pollution control facility, and other discarded material, including solid, liquid, semisolid, or contained gaseous material resulting from industrial operations needs to be evaluated on a case-by-case basis to establish whether it constitutes a hazardous or a non-hazardous waste.

Facilities that generate and store wastes should practice the following:

- Establishing waste management priorities at the outset of activities based on an understanding of potential Environmental, Health, and Safety (EHS) risks and impacts and considering waste generation and its consequences
- Establishing a waste management hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of wastes.
- Avoiding or minimizing the generation waste materials, as far as practicable
- Where waste generation cannot be avoided but has been minimized, recovering and reusing waste

- Where waste can not be recovered or reused, treating, destroying, and disposing of it in an environmentally sound manner

General Waste Management

The following guidance applies to the management of non-hazardous and hazardous waste. Additional guidance specifically applicable to hazardous wastes is presented below. Waste management should be addressed through a Waste management system that addresses issues linked to waste minimization, generation, transport, disposal, and monitoring.

Waste Management Planning

Facilities that generate waste should characterize their waste according to composition, source, types of wastes produced, generation rates, or according to local regulatory requirements. Effective planning and implementation of waste management strategies should include:

- Review of new waste sources during planning, siting, and design activities, including during equipment modifications and process alterations, to identify expected waste generation, pollution prevention opportunities, and necessary treatment, storage, and disposal infrastructure
- Collection of data and information about the process and waste streams in existing facilities, including characterization of waste streams by type, quantities, and potential use/disposition
- Establishment of priorities based on a risk analysis that takes into account the potential EHS risks during the waste cycle and the availability of infrastructure to manage the waste in an environmentally sound manner
- Definition of opportunities for source reduction, as well as reuse and recycling

- Definition of procedures and operational controls for on-site storage
- Definition of options / procedures / operational controls for treatment and final disposal

Waste Prevention

Processes should be designed and operated to prevent, or minimize, the quantities of wastes generated and hazards associated with the wastes generated in accordance with the following strategy:

- Substituting raw materials or inputs with less hazardous or toxic materials, or with those where processing generates lower waste volumes
- Applying manufacturing process that convert materials efficiently, providing higher product output yields, including modification of design of the production process, operating conditions, and process controls⁵⁰
- Instituting good housekeeping and operating practices, including inventory control to reduce the amount of waste resulting from materials that are out-of-date, off-specification, contaminated, damaged, or excess to plant needs
- Instituting procurement measures that recognize opportunities to return usable materials such as containers and which prevents the over ordering of materials
- Minimizing hazardous waste generation by implementing stringent waste segregation to prevent the commingling of non-hazardous and hazardous waste to be managed

⁵⁰ Examples of waste prevention strategies include the concept of Lean Manufacturing found at <http://www.epa.gov/epaoswer/hazwaste/minimize/lean.htm>

Recycling and Reuse

In addition to the implementation of waste prevention strategies, the total amount of waste may be significantly reduced through the implementation of recycling plans, which should consider the following elements:

- Evaluation of waste production processes and identification of potentially recyclable materials
- Identification and recycling of products that can be reintroduced into the manufacturing process or industry activity at the site
- Investigation of external markets for recycling by other industrial processing operations located in the neighborhood or region of the facility (e.g., waste exchange)
- Establishing recycling objectives and formal tracking of waste generation and recycling rates
- Providing training and incentives to employees in order to meet objectives

Treatment and Disposal

If waste materials are still generated after the implementation of feasible waste prevention, reduction, reuse, recovery and recycling measures, waste materials should be treated and disposed of and all measures should be taken to avoid potential impacts to human health and the environment. Selected management approaches should be consistent with the characteristics of the waste and local regulations, and may include one or more of the following:

- On-site or off-site biological, chemical, or physical treatment of the waste material to render it non-hazardous prior to final disposal
- Treatment or disposal at permitted facilities specially designed to receive the waste. Examples include: composting operations for organic non-hazardous

wastes; properly designed, permitted and operated landfills or incinerators designed for the respective type of waste; or other methods known to be effective in the safe, final disposal of waste materials such as bioremediation.

Hazardous Waste Management

Hazardous wastes should always be segregated from non-hazardous wastes. If generation of hazardous waste can not be prevented through the implementation of the above general waste management practices, its management should focus on the prevention of harm to health, safety, and the environment, according to the following additional principles:

- Understanding potential impacts and risks associated with the management of any generated hazardous waste during its complete life cycle
- Ensuring that contractors handling, treating, and disposing of hazardous waste are reputable and legitimate enterprises, licensed by the relevant regulatory agencies and following good international industry practice for the waste being handled
- Ensuring compliance with applicable local and international regulations⁵¹

Waste Storage

Hazardous waste should be stored so as to prevent or control accidental releases to air, soil, and water resources in area location where:

⁵¹ International requirements may include host-country commitments under the Basel Convention on the Control of Transboundary Movements of Hazardous Waste and their disposal (<http://www.basel.int/>) and Rotterdam Convention on the prior Inform Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (<http://www.pic.int/>)

- Waste is stored in a manner that prevents the commingling or contact between incompatible wastes, and allows for inspection between containers to monitor leaks or spills. Examples include sufficient space between incompatibles or physical separation such as walls or containment curbs
- Store in closed containers away from direct sunlight, wind and rain
- Secondary containment systems should be constructed with materials appropriate for the wastes being contained and adequate to prevent loss to the environment
- Secondary containment is included wherever liquid wastes are stored in volumes greater than 220 liters. The available volume of secondary containment should be at least 110 percent of the largest storage container, or 25 percent of the total storage capacity (whichever is greater), in that specific location
- Provide adequate ventilation where volatile wastes are stored.

Hazardous waste storage activities should also be subject to special management actions, conducted by employees who have received specific training in handling and storage of hazardous wastes:

- Provision of readily available information on chemical compatibility to employees, including labeling each container to identify its contents
- Limiting access to hazardous waste storage areas to employees who have received proper training
- Clearly identifying (label) and demarcating the area, including documentation of its location on a facility map or site plan
- Conducting periodic inspections of waste storage areas and documenting the findings

- Preparing and implementing spill response and emergency plans to address their accidental release (additional information on Emergency Plans is provided in Section 3 of this document)
- Avoiding underground storage tanks and underground piping of hazardous waste

Transportation

On-site and Off-site transportation of waste should be conducted so as to prevent or minimize spills, releases, and exposures to employees and the public. All waste containers designated for off-site shipment should be secured and labeled with the contents and associated hazards, be properly loaded on the transport vehicles before leaving the site, and be accompanied by a shipping paper (i.e., manifest) that describes the load and its associated hazards, consistent with the guidance provided in Section 3.4 on the Transport of Hazardous Materials.

Treatment and Disposal

In addition to the recommendations for treatment and disposal applicable to general wastes, the following issues specific to hazardous wastes should be considered:

Commercial or Government Waste Contractors

In the absence of qualified commercial or government-owned waste vendors (taking into consideration proximity and transportation requirements), facilities generating waste should consider using:

- Have the technical capability to manage the waste in a manner that reduces immediate and future impact to the environment
- Have all required permits, certifications, and approvals, of applicable government authorities

- Have been secured through the use of formal procurement agreements

In the absence of qualified commercial or government-owned waste disposal operators (taking into consideration proximity and transportation requirements), project sponsors should consider using:

- Installing on-site waste treatment or recycling processes
- As a final option, constructing facilities that will provide for the environmental sound long-term storage of wastes on-site (as described elsewhere in the General EHS Guidelines) or at an alternative appropriate location up until external commercial options become available

Small Quantities of Hazardous Waste

Hazardous waste materials are frequently generated in small quantities by many projects through a variety of activities such as equipment and building maintenance activities.

Examples of these types of wastes include: spent solvents and oily rags, empty paint cans, chemical containers; used lubricating oil; used batteries (such as nickel-cadmium or lead acid); and lighting equipment, such as lamps or lamp ballasts. These wastes should be managed following the guidance provided in the above sections.

Monitoring

Monitoring activities associated with the management of hazardous and non-hazardous waste should include:

- Regular visual inspection of all waste storage collection and storage areas for evidence of accidental releases and to verify that wastes are properly labeled and stored. When significant quantities of hazardous wastes

are generated and stored on site, monitoring activities should include:

- Inspection of vessels for leaks, drips or other indications of loss
- Identification of cracks, corrosion, or damage to tanks, protective equipment, or floors
- Verification of locks, emergency valves, and other safety devices for easy operation (lubricating if required and employing the practice of keeping locks and safety equipment in standby position when the area is not occupied)
- Checking the operability of emergency systems
- Documenting results of testing for integrity, emissions, or monitoring stations (air, soil vapor, or groundwater)
- Documenting any changes to the storage facility, and any significant changes in the quantity of materials in storage
- Regular audits of waste segregation and collection practices
- Tracking of waste generation trends by type and amount of waste generated, preferably by facility departments
- Characterizing waste at the beginning of generation of a new waste stream, and periodically documenting the characteristics and proper management of the waste, especially hazardous wastes
- Keeping manifests or other records that document the amount of waste generated and its destination
- Periodic auditing of third party treatment, and disposal services including re-use and recycling facilities when significant quantities of hazardous wastes are managed by third parties. Whenever possible, audits should include site visits to the treatment storage and disposal location

- Regular monitoring of groundwater quality in cases of Hazardous Waste on site storage and/or pretreatment and disposal
- Monitoring records for hazardous waste collected, stored, or shipped should include:
 - Name and identification number of the material(s) composing the hazardous waste
 - Physical state (i.e., solid, liquid, gaseous or a combination of one, or more, of these)
 - Quantity (e.g., kilograms or liters, number of containers)
 - Waste shipment tracking documentation to include, quantity and type, date dispatched, date transported and date received, record of the originator, the receiver and the transporter
 - Method and date of storing, repacking, treating, or disposing at the facility, cross-referenced to specific manifest document numbers applicable to the hazardous waste
 - Location of each hazardous waste within the facility, and the quantity at each location