



Moran Environmental Recovery

Waste Disposal Plan

for

Kidney Specialists of Savannah

Savannah, Georgia



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OBJECTIVES

The purpose of this Waste Disposal Plan for the Kidney Specialists of Georgia Mercury Spill 2008 is to detail the scope of work to be performed by Moran Environmental Recovery in order to safely, expeditiously and cost effectively plan, identify, classify, profile, package, manifest, label, placard, stage, transport and dispose waste collected during spill response operations.

SAFETY

Personnel to review this plan, Site Safety Plan and Tailgate Safety Plans. All work to strictly adhere to industry standard safe work practices and the requirements set forth in the Site Safety Plan.

TEAM

MER Operations Reps:

Ken Cook – (912) 313-0217

Gil Horne – (912) 313-3289

MER Project Control Technician

R. Scott Crisp – (843) 202-9169

MER Site Supervisor:

Leo Deleon – (912) 313-6789

Liberty POC – Transportation Spill

Michael Oakman - (904) 285-5333

Alternate POC – Transportation Spill

Savannah Emergency On Call – (912) 232-3224

EQUIPMENT

PPE as approved by Project Control Technician and documentation on Site Safety Plan permits as required, 55-gallon drums, vacuum box, liners, negative air machines, OhioLumex Mercury Analyzer, cell phones for communications, personnel shelter (trailers and tent).

WASTE DISPOSAL PLAN

Planning

1. Waste collection and consolidation will occur during normal operational periods of 0700 to 1900. Waste transportation to disposal facilities will be coordinated with the facility and is expected to primarily occur during normal operational periods of 0700 to 1900.



2. There is one type of waste stream anticipated: *Solid waste stream* - saturated absorbents, pads, powders, PPE, and miscellaneous building debris, etc. - will be collected, drummed and placed into approved, lined vacuum box at waste collection sites identified in the work zone. These items will be co-mingled.
3. Work is to be coordinated with MER, EPA representatives and other contractors potentially affected by the movement and staging of drums and the vacuum box. Confirm that there are no conflicts or safety issues created by staging equipment with material ready for disposal. Ensure personnel in the vicinity of disposal staging and transportation operations are provided with method of communicating with the disposal crew.
4. All equipment and PPE is to be thoroughly inspected prior to being operated and used. Vehicles are to under go standard pre-trip inspections. Drums are to be examined for signs of deterioration and damage. Electrical cords are to be properly grounded and rated for the intended load. All electrical cords will be inspected for flat spots, kinks, abrasion wear, or other signs of deterioration and damage. Cords shall be located such that they will not have equipment placed on top of or driven over them, nor be tripping hazards.
5. The vacuum box will be sent to the disposal facility to be emptied, and contents of the drums will be incinerated.

Waste Stream Identification

6. The Waste Stream will be identified as: "Mercury and Debris" for solids.

Waste Classification

8. Hazardous Waste Solid, N.O.S.

Waste Stream Profiling

7. The Generator will sign all profiles. Profiles will be forwarded to the appropriate disposal facility for approval. Liberty Environmental Solutions, Inc will provide waste characterization and profile execution.



Packaging

8. Solid waste will be placed in primary storage containers, 55-gallon drums and then stored in a secondary storage container, an approved, secured, lined vacuum box.

Manifesting

9. Each load of waste will be properly manifested in accordance with 40 CFR 263, be signed by the driver and a copy provided to the Generator.

Labeling, Placarding and Transportation

10. Each drum and subsequent vacuum box containing waste will be properly marked, labeled and placarded for shipment according to Department of Transportation regulations. The shipper is responsible for providing the transporter with the required placards. The transporter is responsible for delivering the waste to the disposal facility identified on the manifest.
11. Once cleared by EPA, the waste container(s) will be allowed to leave the work site and be transported to the disposal facility.

Transportation

12. Proper permits, labels and manifests will be in place in accordance with Hazardous Waste Manifest and transportation guidelines.

Disposal

13. All waste will be disposed of through incineration.



Site Clean Up

14. Once all waste has been transported to disposal facility, site clean up may begin.
15. Work areas are to be policed for trash and debris, which if found, shall be thrown away in an appropriate manner.
16. A representative of Kidney Specialists of Savannah will make the final site inspection and approve the work site as clean.
17. Copies of all Waste Profiles, Manifests, etc. will be provided to Kidney Specialists of Savannah.

Contingencies

18. Personal injury. Stop Disposal activities immediately, follow Site Safety plan.
19. Inclement Weather: Dangerous weather including but not limited to high winds, heavy rain, or lightning may require Disposal operations to be suspended. On the approach of inclement weather all containers are to be secured. Personnel will seek shelter in vehicles until the weather subsides.

Generator:

Kidney Specialists of Georgia
500 East 66th Street
Savannah, GA 31405
(912) 356-5643
USEPA Federal ID#:
Generator State ID#: CESQG

Transporter:

Liberty Environmental Solutions Inc
230 Canal Blvd, Suite 1
Ponte Vedra Beach, FL 32082
(904) 285-5333
USEPA Federal ID#: NJD054126164

Designated Facility:

Pollution Control Industries
5485 Victory Lane
Memphis, TN 38053
USEPA Federal ID#: TND000772186