

Waste Acceptance Control Program Manual

for the City & County of San Francisco
and Recology San Francisco

1.0 INTRODUCTION

1.1 Preamble and Program Objective

On January 2, 1987, the City and County of San Francisco (“City”) and Recology San Francisco¹ (“Recology”). Recology entered into: (1) a long-term Waste Disposal Agreement (“Disposal Agreement”) with Waste Management Inc. (formerly Oakland Scavenger Company) and (2) an Agreement in Facilitation of Waste Disposal Agreement (“Facilitation Agreement”).

The Facilitation Agreement required the City and Recology to prepare a program for management of hazardous and designated wastes as those terms are defined in the Disposal Agreement², to submit that program to the Refuse Collection and Disposal Rate Board (“Rate Board”) for approval, and to begin implementation of the program on or before November 1, 1988. After extensive effort and discussion between the City and Recology, a Waste Acceptance Control Program (“WACP”) was developed jointly and submitted to the Rate Board.

The WACP was designed to identify and remove from the City's municipal waste stream prohibited wastes that are delivered to the San Francisco Solid Waste Transfer and Recycling Center (“SFSWTRC”) operated by Recology and Recycle Central at Pier 96 (“RC”). The WACP has the following goals:

- To encourage the proper disposal of prohibited wastes.
- To reduce the quantity of prohibited wastes entering the municipal solid waste stream.
- To identify generators of prohibited wastes in the municipal solid waste stream and require them to assume responsibility for the proper management of their wastes.
- To provide for an effective enforcement program against recalcitrant generators, requiring them to properly manage their prohibited wastes.
- To assist with the proper management of prohibited wastes delivered to the SFSWTRC and RC

The joint effort and cooperation of the City and Recology is required to implement each of these goals. Accordingly, the WACP Manual includes a description of measures that both the City and Recology will implement in an effort to achieve these goals.

¹ Recology San Francisco was formerly called Sanitary Fill Company, followed by SF Recycling and Disposal.

² The Waste Acceptance Control Program addresses prohibited wastes, as defined herein. See Section 2.2. Hazardous and designated wastes are included within the definition of prohibited waste

To build on the WACP, the City and Recology will: (1) gather data regarding the nature and sources of prohibited wastes in the municipal waste stream, and (2) consider effective methods for achieving the goals of the WACP.

As more information becomes available, the parties will reevaluate the WACP and, if necessary, modify or eliminate existing programs, and/or implement new programs to address identified concerns. The parties will continue to meet periodically to discuss the status of the program and the need for revisions to it. The parties will also meet periodically to develop specific waste management procedures consistent with all the WACP programs described herein.

Minor changes in procedures will be implemented by Recology and reported to the City. Any substantial changes in the program will be discussed and agreed to by the parties prior to implementation. Notwithstanding the above, all changes are subject to the rights of the City pursuant to the Facilitation Agreement to determine what the WACP program shall be and, therefore, to effect changes. Any change in the WACP that requires additional expenditures that may materially affect Recology's maximum lawful rate for refuse disposal will be submitted to the Rate Board for approval before implementation.

The City and Recology will routinely review the WACP document at least once every five years. This routine review will precede the regular five year review of the Solid Waste Facility Permit issued to the SFSWTRC. Recology must submit a permit review application (Report of Station Information) to the Local Enforcement Agency ("LEA") at least 120 days before the Solid Waste Facility Permit five-year review date.

The implementation of the WACP may impact the SFSWTRC's Transfer and Processing Report (TPR). Accordingly, the parties will complete a routine review of the WACP at least 240 days before Recology must submit a TPR to the LEA. This schedule will provide Recology with sufficient time to assess the effect of any revisions to the WACP, in the TPR.

In addition to the routine review of the WACP, one or both parties may initiate non-routine reviews to the WACP. Such reviews may be necessary for a number of reasons, including without limitation: (1) significant changes in the operation of the WACP, (2) changes in the regulatory requirements applicable to the implementation of the WACP, and (3) changes in the operation of the SFSWTRC or RC that may impact the WACP. Should either the City or Recology determine that a non-routine review of the WACP is warranted, the party initiating such review will notify the other in writing of the need for such review. The parties will endeavor to undertake the review within 120 days before Recology must submit new documentation to the LEA for the SFSWTRC and RC as a whole.

References are made throughout this document to the routine five-year review of the WACP. Such references shall be deemed to include non-routine review(s)

that may be initiated by either the City or Recology. Where a decision or action set forth in this WACP is specifically noted as one that will be reviewed in five years, such decision or action also may be reviewed and revised at an earlier date, as part of the non-routine review of the WACP.

1.2 Background

In accordance with the Initiative Refuse Collection and Disposal Ordinance adopted by the City of San Francisco on November 8, 1932, all of the refuse generated in the City and County of San Francisco is delivered to the SFSWTRC or RC owned and operated by Recology and located in the southern portion of the City, west of Highway 101 (See maps in Appendix 1).

The SFSWTRC consists of the following areas:

- Transfer Station (“Pit”)
- Integrated Materials Recovery Facility (“IMRF”)
- Construction & Demolition (“C&D”) Sort Line
- Public Disposal and Recycling Area (“PDRA”)
- Auxiliary Disposal and Recycling Area
- Organics Annex
- Household Hazardous Waste Collection Facility (“HHWCF”)

Recycle Central at Pier 96 consists of the following areas:

- Single Stream Tipping Floor
- Mixed Commercial Tipping Floor
- Single Stream Sort Lines
- Mixed Commercial Sort Lines
- Source Separated Buy-Back Area

1.3 Site Description

The majority of landfill bound municipal solid waste (compacted and uncompacted) from the City and County of San Francisco is delivered to the SFSWTRC by the local refuse collection services, commercial haulers, and the City. Most of the solid waste arriving at the SFSWTRC is unloaded directly into a large pit within the Transfer Station building, where it is crushed and pushed by a bulldozer into open-top transfer trailers for transfer to the Altamont Landfill in Alameda County.

Additional information on the SFSWTRC operation is provided in the 2001 Transfer/Processing Report. The Transfer Station's operation is generally regulated by the Solid Waste Facility Permit No. 38-AA-0001 (Appendix 2), approved and issued by the San Francisco Department of Public Health Environmental Health Section, Local Enforcement Agency, and approved by the CalRecycle.

The related goals of increased recycling and landfill diversion have resulted in new and evolving waste handling facilities and activities. Until 2003, most of San Francisco's solid waste and recyclables were delivered to the SFSWTRC by the local refuse collection services, commercial haulers, and City vehicles for receipt and processing. In 2003 a significant new sorting facility was opened by Recology at Pier 96 for sorting source-separated blue-bin recyclables into paper, metal, glass and plastic commodity streams.

Currently San Francisco's solid waste is divided into four main categories:

- 1) Source-separated blue-bin curbside recyclables consisting of cans, bottles, paper, and plastic.
- 2) Source-separated green bin food waste and green waste.
- 3) Highly recyclable C&D waste from debris boxes and self-haul generators.
- 4) Black bin landfill bound waste.

Source-separated blue bin recyclables are delivered to Pier 96 where they are sorted and prepared for shipment to commodities markets. Unrecyclable residuals from Pier 96 are loaded directly into a walking-floor transfer trailer for transport to landfill. All other waste streams including green bin organics, landfill bound garbage, and C&D waste are received at the SFSWTRC.

Source-separated green bin organics are unloaded at the Organics Annex, a dedicated tipping and loadout area adjacent and south of the Pit. Green waste trucks dump directly onto the concrete floor of the Organics Annex. A dedicated loadchecker inspects the incoming loads and removes plastic, metal, wood, and other inappropriate materials that would contaminate the composting feedstock. A loader is used to manage the storage of the green waste within the building and push it through a load-out bay at the south end of the building into waiting trucks parked below on a scale platform. Source separated green waste from small business landscapers is received at the north end of the ADRA.

Commercial C&D waste is delivered to a dedicated IRMF adjacent to and east of the Pit building. Trucks and debris boxes of C&D dump onto a paved tipping pad inside the northwest corner of the building. A loader manages the storage of the material within the building and loads it onto two parallel sort lines. Workers separate the mixed C&D material into wood, metal, plastic and other marketable commodities for recycling. They also remove hazardous waste, universal waste, and treated wood for proper management. Unrecyclable residuals are conveyed directly into the Pit for landfill disposal.

Self-haul C&D is dumped at the PDRA. Recycling workers remove hazardous waste, universal waste, and treated wood for proper management. C&D waste from the PDRA is loaded onto a sort line and separated into various reusable commodities. Sort line residuals are conveyed directly into long-haul transfer truck for transport to landfill.

Solid wastes abandoned on City streets and picked up by the San Francisco Department of Public Works (“DPW”) and San Francisco Housing Authority (“SFHA”) is dumped onto the paved surface of the ADRA located northwest HWCF. A loadchecker inspects the DPW and SFHA waste for hazardous waste, appliances, tires, and other prohibited wastes.

The SFSWTRC annually transfers approximately 400,000 tons of refuse to the Altamont Landfill. The Transfer Station, Recycling Pad, and PDRA are open to the public and to commercial accounts 7 days per week, excluding certain holidays. The Transfer Station is open 24 hours a day, while the PDRA is generally open 10 hours a day.

1.4 Site Security

Recology has established numerous security measures to control access to the SFSWTRC and RC. By controlling access to the property, Recology reduces the likelihood of inadvertent or intentional dumping or disposal of prohibited waste.

Security measures include:

- Control structures surrounding the property (e.g. gates, fences, walls) and building alarm systems
- Control of access to the property
- Security guards monitoring the property and controlling traffic
- Employee training in maintaining property security

Control Structures

The SFSWTRC is entirely surrounded by physical structures that allow Recology to control access during the hours of operation and to prohibit unauthorized access during non-operational hours. During operational hours, entry gates are opened to allow access to the site. Guards are stationed at the gates to monitor and direct traffic.

The HHWCF is secured by a perimeter fence. The fence and doors into the facility are locked during all non-operational hours. Keys to the HHWCF are distributed only to the WACP and HHWCF staff. Recology management personnel have access to the keys to the HHWCF in the event of an emergency situation.

The administrative offices are equipped with an intruder alarm system. Should unauthorized entry occur, the monitoring system will alert the local police department who in turn will notify Recology management.

Access to Site

Access is generally limited to the following categories of persons: (1) customers delivering waste to the property, (2) persons conducting official business, (3) escorted tour groups, and (4) Recology employees. Incoming customers must

weigh in at one of the incoming scales. Guests are not allowed on the property during off-hours unless accompanied by authorized Recology personnel.

During normal business hours, visitors to the SFSWTRC are required to sign a visitor's log located at the main office. Tours of the SFSWTRC require an escort by Recology personnel. Tours are generally arranged in advance through the main office at 501 Tunnel Avenue.

During off-hours, access to the SFSWTRC is limited to the main gate on Visitacion Avenue (also called Recycle Road) west of the public scalehouse. This gate is always controlled by either the scalemaster or the security guard on duty. Access to the PIT is controlled 24 hours a day by the scalemaster and sweepers.

Access to Recycle Central at Pier 96 is via the Port of San Francisco's Pier 96 gatehouse located at the intersection of Cargo Way and Jennings Street. Upon entering the Pier 96 gatehouse, a traffic corridor is used to provide access to the facility entrance. The Scalehouse represents the primary entrance to the facility and serves as the access point for inbound and outbound traffic and source-separated buy-back area users. Recology employees and visitors, in turn, access the facility using the parking lot entrance located at the west end of the site (i.e., south of the scalehouse entrance).

Security Service

A private security service is under contract to provide Recology with guards at both sites. During business hours, they control traffic. During non-operational hours, including weekends, the guards patrol key areas of the sites including all buildings, recycling areas, and access roads to ensure that all areas are secure and that no unusual events have occurred. Should anything unusual occur, security guards are instructed to promptly notify their supervisor. Recology management personnel can be contacted, if necessary.

Employee Security Training

Employees are instructed to notify their supervisors should they identify any unfamiliar persons on the property.

Employees with responsibility for maintenance survey the property and access roads, including Tunnel Avenue and Beatty Road. Select material handlers are responsible for picking up litter on access roads, and in the Little Hollywood neighborhood. Should prohibited wastes be abandoned in any of these areas, Recology employees report their findings to the WACP staff. The WACP staff take appropriate action to manage the prohibited wastes. Such measures may include collecting and managing the prohibited waste at the Household Hazardous Waste Collection Facility. In addition WACP staff also may take further measures such as seeking to (1) identify the generator, (2) obtain the generator's cooperation in arranging for the proper management of the prohibited

waste, and (3) notify the City should enforcement proceedings be considered advisable.

1.5 Off-Site Facilities (San Francisco Regional Companies)

Other solid waste management companies exist in San Francisco. The companies identified below are owned in whole or in part by Recology and are referred to herein as the “San Francisco Regional Companies” or each individually, as a “San Francisco Regional Company.” As part of its WACP responsibilities, Recology through the WACP staff participates in waste management programs with the San Francisco Regional Companies.

Recology Golden Gate: Recology Golden Gate is located at 900 7th Street in San Francisco. The company is responsible for the collection of recyclables, compostables and municipal solid waste in the downtown region of San Francisco. Recology Golden Gate delivers the waste to the SFSWTRC and Pier 96 in front, split, and rear loader trucks, roll off compactor boxes and debris boxes.

Recology Sunset Scavenger: Recology Sunset Scavenger is located adjacent to the SFSWTRC at Tunnel and Beatty Road in San Francisco. Sunset Scavenger Company collects recyclables, compostables, and municipal solid waste in the outlying areas of San Francisco. The waste is brought to the SFSWTRC and Pier 96 in front, split, and rear loader trucks, roll-off compactor boxes and debris boxes. Sunset Scavenger Company is also responsible for the collection of municipal solid waste for the Recycle My Junk (home collection of large items) and Gigantic 3 (neighborhood based refuse collection event).

2.0 Waste Identification

This chapter describes (1) the types of wastes that can be accepted at the SFSWTRC and RC, (2) the types of wastes that are prohibited, and (3) the methodology for determining whether a particular waste type can be accepted.

2.1 Permissible Wastes

SFSWTRC

Pursuant to the Solid Waste Facility Permit, contractual documents, and applicable laws and regulations, the SFSWTRC accepts the following nonhazardous solid wastes:

- Refuse, including garbage and rubbish
- Source separated organic waste
- Nonhazardous solid waste from industrial sources
- Construction and demolition waste
- Empty and dried household hazardous waste containers, five gallons or less in quantity

- Other nonhazardous solid wastes not prohibited from being accepted at the SFSWTRC under its operating permits, or relevant contractual agreements

Used motor oil and other petroleum-based oil is currently accepted, provided that it is segregated from other solid wastes. This oil is collected in an aboveground double-walled tank located adjacent to the Auxiliary Public Disposal Area, See maps in Appendix A).

Universal wastes including batteries, fluorescent lamps, and electronic wastes are accepted at the PDRA. Universal wastes are sorted and packaged for transport to off-site recycling facilities.

Household hazardous wastes are accepted at the HHWCF. These wastes include paint and paint products, solvents, acids, caustics, pool chemicals, household cleaners, automotive products, and pesticides. The HHWCF is described in Section 5.0.

Recycle Central at Pier 96

Pier 96 receives and process source-separated and targeted recyclable streams containing predominantly dry recyclable materials from residences and businesses. Recyclable materials streams, including source-separated and targeted streams will contain:

- Old newsprint
- Old corrugated cardboard (OCC)
- White and colored ledger paper
- Mixed office paper grades
- Confidential paper documents
- Aluminum beverage cans
- Tin cans
- Glass bottles and jars
- Polyethylene terephthalate (PET) plastic containers
- High density polyethylene (HDPE) plastic containers
- Scrap metal
- Wood

Recyclable streams processed at RC are expected to contain varying percentages of residual non-hazardous general waste (identified herein as “residue material”). This material will be collected during the course of the processing operations and subsequently transported off-site to a permitted solid waste disposal facility.

RC will not receive or process the following waste streams:

- Construction and demolition wastes
- Source-separated organics
- Public self-haul garbage

- Hazardous waste as defined in 22 CCR, §66261.3.
- Liquid and high liquid content wastes (i.e., wastes with greater than 50 percent water by weight), including septic tank pumpings (as defined in 14 CCR, §17225.64), sewage sludge (as defined in 14 CCR, §17225.65), or non-hazardous sludge waste (as defined in 14 CCR, §17225.67).
- Special wastes as defined in 22 CCR, §66261.122.
- Medical or infectious wastes as defined in 14 CCR, §17225.36.

2.2 Prohibited Wastes

With the exception of the hazardous waste storage areas designated in this document (e.g. the HHWCF), the SFSWTRC and Pier 96 are prohibited by their Solid Waste Facility Permits, contractual documents, and applicable laws and regulations, from accepting the following wastes:

- Hazardous waste
- Designated waste
- Untreated medical waste
- Liquid waste
- Dead animals or parts
- Septic tank pumpings or sewage sludge of any origin
- Radioactive waste
- Compressed gases
- Other wastes, as determined by the WACP staff, the landfill owner, or federal, state, or local regulations

Common examples of prohibited wastes include: paints, solvents, other flammables, pesticides, asbestos, acid and caustic solutions, PCBs, inks, photographic and pool chemicals, oxidizers, gasoline, explosives, and water reactives. Pressurized gas cylinders, pharmaceuticals, radioactives, and medical wastes also are prohibited. A representative list of materials that the SFSWTRC is prohibited from accepting is included in Appendix B (in the Solid Waste Permit?).

Presented below is a discussion of the characteristics of hazardous, designated, and medical wastes. The discussion is based upon the parties' present understanding of federal, state and local laws and regulations. Should such requirements change, the parties will modify WACP procedures to conform to new standards.

Characteristics of Hazardous Wastes

Hazardous wastes include those wastes that exhibit any of the criteria set forth in Article 3 of Chapter 11, Title 22 of the California Code of Regulations (CCR). Hazardous waste criteria include toxicity (22 CCR Section 66261.24), ignitability (22 CCR Section 66261.21), reactivity (22 CCR Section 66261.23), and corrosivity (22 CCR Section 66261.22). See also 22 CCR chapter 11 Appendix X, for a list of common chemical wastes and their respective potential hazardous

properties. In addition, materials considered hazardous wastes pursuant to the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Section 6901 et seq., also are considered hazardous wastes under state law (California Health and Safety Code, Sections 25143.2 and 25159.5). In addition, California classified certain hazardous wastes as universal wastes prohibited from solid waste landfills including: fluorescent lamps, household batteries, cathode ray devices, electronics wastes, mercury devices, and aerosol cans.

Common examples of hazardous wastes include the following:

Toxic wastes

- Pesticides
- PCBs
- Cleaners
- Arsenic
- Heavy metals

Ignitable wastes

- Solvents
- Oil-based paints
- Gasoline
- Brake Fluid

Reactive wastes

- Pyrophorics
- Cyanides
- Explosives
- Sulfides

Corrosive wastes

- Car batteries
- Ammonia and ammonia-based cleaners
- Oven cleaners
- Sulfuric and hydrochloric acid

Characteristics of Designated Wastes

Pursuant to Section 20164 of Title 27 of the CCR California Water Code section 13173, designated wastes are defined as:

- (a) Hazardous waste that has been granted a variance from hazardous waste management requirements pursuant to Section 25143 of the Health and Safety Code.
- (b) Nonhazardous waste that consists of, or contains, pollutants that, under ambient environmental conditions at a waste management unit, could be released in concentrations exceeding applicable water quality objectives or

that could reasonably be expected to affect beneficial uses of the waters of the state as contained in the appropriate state water quality control plan.

Common examples of designated wastes include petroleum contaminated soil, sand blasting sand, oil-field drilling fluids, sewage sludge, and incinerator ash. Pursuant to Section 20210 of Title 27 of the CCR, designated wastes must be managed at special facilities classified by the California Regional Water Quality Control Board as “Class I” or “Class II” waste management units. Class II units must be approved for the specific designated waste and can be located at solid waste landfills (Class III). Designated wastes are dependent upon the individual landfill characteristics. A certain waste maybe considered a designated waste at one site but a Class II solid waste at another.

Characteristics of Medical Wastes

- In 1990 the legislature adopted the Medical Waste Management Act, (California Health and Safety Code Section 117600 et seq.. Pursuant to the Medical Waste Management Act, the following types of waste are now regulated as medical waste: Waste associated with the diagnosis, treatment, or immunization of human beings or animals.
- Waste associated with the research pertaining to the activities specified in subparagraph (A).
- The accumulation of properly contained home-generated sharps waste that is brought by a patient, a member of the patient’s family, or by a person authorized by the enforcement agency, to a point of consolidation approved by the enforcement agency pursuant to Section 117904 or authorized pursuant to Section 118147.
- Removal of a regulated waste, as defined in Section 5193 of Title 8 of the California Code of Regulations, from a trauma scene by a trauma scene waste management practitioner.
- Biohazardous waste
- Laboratory wastes
- Cultures of infectious agents
- Waste from production of bacteria, viruses or spores
- Human or animal surgical specimens or tissues
- Animal parts, tissues fluids, or carcasses suspected of being contaminated with infectious agents known to be contagious to humans
- Contaminated equipment, instruments, utensils, and other disposable materials
- Waste which contains recognizable fluid blood, fluid blood products
- Excretion, exudate or secretions from humans requiring isolation
- Sharps waste, including hypodermic needles, syringes, blades, and needles with attached tubing

The Medical Waste Management Act establishes general requirements pertaining to the management of medical wastes, including but not limited to the following:

- Medical wastes shall be segregated from other waste at the point of origin in the producing facility
- Medical wastes shall be separately contained from other wastes
- Enclosures or containers used for the containment of medical wastes shall be secured so as to deny access to unauthorized persons and shall be marked by prominent warning signs
- Sharps waste shall be contained in a sharps container, which is leak proof and has a tight fitting lid

Medical waste generated by households is not regulated as medical waste including home-generated sharps. "Home-generated sharps waste" are defined as hypodermic needles, pen needles, intravenous needles, lancets, and other devices that are used to penetrate the skin for the delivery of medications derived from a household, including a multifamily residence or household (California Health and Safety Code, Section 117671). This also includes sharps from farms and ranches and sharps used on pets.

Effective September 1, 2008, home-generated sharps are prohibited from any of the following containers (California Health and Safety Code, Section 118286):

- (1) Any container used for the collection of solid waste, recyclable materials, or greenwaste.
- (2) Any container used for the commercial collection of solid waste or recyclable materials from business establishments.
- (3) Any roll-off container used for the collection of solid waste, construction, and demolition debris, greenwaste, or other recyclable materials.

The accumulation of home-generated sharps is regulated as medical wastes.

2.3 Determining Acceptability of Wastes

Methodology

A key component of the WACP is determining whether wastes can be accepted at the SFSWTRC or Pier 96, based on the contractual and/or regulatory criteria described in Section 2. The decision making process typically involves one or more activities, ranging from questioning of customers to performing waste characterization in the field. These waste identification activities include:

- Responding to customer inquiries
- Questioning of customers by WACP staff
- Physical assessment/review of product labels
- Waste characterization in the field
- Additional assessment, as needed

The WACP staff are responsible for conducting the waste identification activities at a number of locations at the SFSWTRC and Pier 96, including the office areas, scalehouses, Public Unloading Area, Transfer Station, HHWCF, and Recycling

Pad. The control mechanisms for the waste identification activities include responding to inquiries from customers, surveillance of incoming wastes, and deliberate waste inspection on a random basis.

Waste Identification Activities

The concepts associated with each of the waste identification activities are summarized below. Information derived from these activities is considered when evaluating various aspects of the WACP. Note that there is no fixed sequence to these activities and that several activities may be undertaken simultaneously (e.g., questioning of customers and physical assessment). Once the wastes are identified, WACP staff check existing lists of permissible and prohibited wastes to determine whether the SFSWTRC can accept the wastes.

Customer Inquiries: Customers at any one of the waste control points on the property (e.g. scalehouse, public unloading area) occasionally have questions concerning the acceptability of specific wastes. In addition, customers and the public regularly call the WACP staff to determine waste acceptance criteria. When such inquiries involve a known waste (e.g., waste oil or empty, dried paint cans), WACP staff can refer to the lists of permissible and prohibited wastes to respond to the customer's question. On the other hand, if there is any uncertainty on the part of either the customer or WACP staff concerning the identification of the waste in question, additional waste identification activities, such as physical assessment, may be required.

Questioning of Customers by WACP staff: At any waste control point within the SFSWTRC or Pier 96 where a load is suspected of containing prohibited wastes, customers are questioned by work crews or WACP staff concerning the contents of the load. If a suspicious load is observed by a member of the work crew, he or she can request that WACP staff conduct the questioning. In some cases, questioning takes place after the customer has dropped off the waste. WACP staff may contact a customer and inquire about (1) the kind of materials that are typically delivered to the SFSWTRC and (2) the nature of the customer's business, if relevant. In many cases the questioning of customers by WACP staff simultaneously involves several of the activities listed below.

Physical Assessment/Review of Product Labels: As noted above, the WACP staff reviews product labels and physically assesses the waste at the same time that they are questioning a customer concerning the contents of a given waste. In examining a product label, the staff member may determine that the product is classified as a prohibited waste. Warning labels such as flammable or poison are often useful in identifying the waste type.

In some cases, physical signs such as odor or color may indicate the presence of a prohibited waste. This observation, coupled with a customer's response to questions, often provides sufficient data to determine that the waste is prohibited.

When assessing a waste load, WACP staff may note a waste type that draws attention to the rest of the load; an example would be one or more 55-gallon drums within a load of residential or other refuse. Once noted, the customer would be questioned, and, if needed, additional assessment undertaken.

Waste Characterization in the Field

If the waste cannot be identified by the above procedures, WACP staff may characterize the waste at the SFSWTRC by means of qualitative analysis. The Waste Identification and Classification Test (WICT) was developed by a HHWCF chemist. The WICT is used to determine the chemical constituents and the proper Department of Transportation (DOT) waste stream for packaging and disposal of the waste. The WICT system is approved by the transport, storage and disposal facility (TSDf) which accepts the WACP prohibited waste for disposal. The tests are used to determine whether the waste is ignitable, corrosive, reactive and toxic. When wastes are chemically analyzed, the waste container is labeled with a unique number and a corresponding WICT Data Sheet is stamped with the same number. The WICT test results are sent to the TSDf for approval before the wastes are shipped. A copy of the WICT Data Sheet is kept on file at Recology.

Additional Assessment

In some cases the steps outlined above may be insufficient to identify whether the waste can be accepted or otherwise managed at the SFSWTRC. Since it is the customer's responsibility to ensure that a waste is permissible, the WACP staff may require additional measures to be undertaken by the customer at his/her expense prior to acceptance of the waste. When this occurs, the WACP staff will assist the customer in exercising one or more of the following options:

- Written clarification by regulatory agencies
- Written clearance by Waste Management, Inc., owners of the Altamont Landfill
- Analysis by a state-certified hazardous waste laboratory

The ultimate responsibility and cost associated with obtaining the laboratory analysis rests with the customer.

3.0 WASTE MANAGEMENT PROCEDURES

As part of the WACP, Recology and the City undertake the following waste acceptance control measures:

- Customer Notification
- Public Notification
- Site Surveillance
- Waste Inspection Program for Prohibited Wastes
- Management of Prohibited Wastes Found at the SFSWTRC
- Management of Prohibited Waste Found at Off-Site Locations
- Procedures to Obtain the Cooperation of Recalcitrant Generators

Recology may develop and revise, as necessary, internal guidelines pertaining to such matters as the management of specific waste types, training topics, and routine activities associated with the WACP.

3.1 Customer Notification Program

The customer notification program is designed to describe and to explain to Recology customers the policies and procedures of the Waste Acceptance Control Program. It consists of:

- Notification of customers
- WACP staff response to customer and public inquiries
- Posting of signs
- Training available to commercial customers

Customer Notification

Notices describing the policy of nonacceptance of prohibited wastes are available for Recology's customers (e.g., commercial haulers, local collection services, City agencies, and residents using the SRSWTRC and RC). These notices may include examples of the types of products that are prohibited from disposal at the SFSWTRC or RC. Notices also alert customers that their incoming wastes are subject to waste inspection by the WACP staff. Copies of such notices are posted at each scalehouse and are available for distribution.

Examples of the kind of information to be included in these notices include the following:

- Hazardous wastes and certain other types of wastes described in the notice are not accepted at the SFSWTRC or RC (with the exception of the HHWCF) and may not be placed in refuse, recycling, or green waste containers
- A waste inspection program is in effect at the SFSWTRC and RC for detecting hazardous and other unacceptable wastes
- If hazardous or other unacceptable wastes are delivered to the SFSWTRC or RC (with the exception of the HHWCF the customer will be requested, in accordance with procedures approved by the City, to remove and dispose of the waste in accordance with law and at the customer's expense.

Response to Customer and Public Enquiries

The WACP staff regularly receives calls from customers and from the public concerning policies and procedures for delivering wastes to the SFSWTRC. In the course of responding to these calls, the staff (1) clarifies for the customer, and or members of the public, which wastes are prohibited from acceptance at the SFSWTRC and (2) offers assistance on a wide range of waste disposal questions. Where appropriate, WACP staff refer customers to the Department of the Environment's website for additional assistance.

The WACP staff is also questioned about waste acceptance policies and procedures by customers at the SFSWTRC. This presents an additional opportunity to educate customers concerning prohibited wastes.

Posting of Signs

Signs describing the policy of not accepting prohibited wastes are prominently posted at (1) the public scalehouse, (2) the PDRA, (3) the main scalehouse, and (4) the Transfer Station. Signs list examples of prohibited wastes and inform the customer that any load brought to the SFSWTRC is subject to a waste inspection. Signs may be modified periodically, as needed. Similar signs are also posted at the San Francisco Regional Companies.

Container Notices

Decals are placed on large waste containers owned by the City and the San Francisco Regional Companies to inform customers that the disposal of prohibited waste is not acceptable in the waste container. Decals are replaced, as necessary, during routine maintenance of waste containers.

Training of Companies which use the SFSWTRC

Training programs are made available to the San Francisco Regional Companies, and to customers of Recology who are found disposing of waste improperly. The goal of these training programs is to encourage the proper disposal of prohibited wastes. Training programs include the following topics:

- Identification of prohibited and potentially prohibited wastes
- The need for the proper disposal of prohibited wastes
- An overview of the WACP, including the City's enforcement program
- Emergency response and other resources available to customers (e.g. local and state emergency response agencies, City enforcement officers, and WACP staff)
- Other information regarding specific waste streams or particular problems encountered by the customer, as required

Where necessary, training may vary to address specific job functions. Regional companies interested in receiving information regarding training are requested to contact WACP staff.

Training is provided to such personnel as collectors, supervisors, dispatchers, administrative personnel, and management. WACP staff provide training

covering the objectives of the WACP program, and periodic training updates (approximately once every twelve months) to the collection companies. Refresher training generally focuses on specific problems identified by collectors or WACP staff in the course of undertaking various WACP programs.

3.2 Public Notification Programs

The City, in consultation with Recology and WACP staff, produces multilingual outreach materials and campaigns in response to identified needs and changing regulations. Information is distributed to San Francisco residents, businesses, and City agencies, and typically describes the types of waste that are prohibited from disposal in the municipal solid waste stream and the programs in place to properly manage them.

Outreach is done in a wide variety of ways including by direct mail, at public meetings and events, City and Recology websites, through social media, and to customers coming through the SFSWTRC. In addition, tours of the SFSWTRC are offered to the public that inform the participants about the HHWCF and the SFSWTRC waste acceptance policies.

3.3 Site Surveillance

Site surveillance is an essential component of the WACP in that it allows a high degree of visual inspection of incoming wastes by both the work crews and the WACP staff. Surveillance serves as a deterrent for the customer who may deliver prohibited waste to the SFSWTRC. It occurs, in varying degrees, at all SFSWTRC control points and allows for expeditiously checking waste loads. The control points are:

- Public Scalehouse
- Public Disposal and Recycling Area/Public Unloading Area
- Main Scalehouse
- iMRF Tipping Floor
- Transfer Station/Tipping Floor
- Transfer Station/Loading Bay

A brief description of surveillance activities at each of these areas is presented below:

PDRA & HHWCF Control Points

Incoming wastes are observed from two control points: the public scalehouse and the public unloading area.

Public Scalehouse

Initially, the scalehouse weighmaster observes incoming vehicles for an indication of the presence of prohibited wastes. If a suspicious-looking load is observed, the weighmaster calls the WACP staff to determine the acceptability of

the waste. If prohibited wastes are identified during the inspection of a load, either the entire load or, when appropriate, the prohibited portion is rejected, and not allowed into the public unloading area. If the waste appears acceptable, it is directed to the PDRA for dumping.

Public Disposal and Recycling Area: At the PDRA, customers manually unload their wastes onto the cement floor. Trained Recology employees generally are present to observe the waste material being unloaded by the customer. Materials suitable for recycling are segregated from the load by the work crew.

This activity provides an opportunity for work crews and WACP staff to conduct a visual inspection of the waste. If a WACP staff member is not available, the work crew surveys the waste for evidence of prohibited wastes. Questionable wastes discovered by the WACP staff and/or work crews are removed from the waste stream and returned to the customer, in accordance with procedures approved by the City, or set aside for further identification.

Household Hazardous Waste Collection Facility: The HHWCF serves as a control point because it allows WACP staff to survey potential prohibited wastes from the public. Prohibited wastes other than household hazardous wastes from San Francisco residents are not accepted at the HHWCF by the WACP or HHWCF staff.

Transfer Station Control Points

Trucks delivering uncompacted or compacted wastes to the Transfer Station unload their wastes at one of several areas of the Transfer Station. The process of routing these trucks to a particular location provides an opportunity to check incoming loads for suspected prohibited wastes. Each of the Transfer Station control points is briefly described below.

Main Scalehouse

The weighmaster at the scalehouse observes incoming commercial loads for an indication of the presence of prohibited waste, and if necessary, questions the driver about the load, and in some cases, visually inspects parts of the load. Visual inspections are limited because all incoming loads are required to be tarped. If the scalemaster suspects that prohibited wastes are contained within the incoming load, the scalemaster informs the customer that the wastes cannot be accepted, and/or contacts the WACP staff for assistance.

Fig. 5 Traffic and Waste Flow Diagram for the Public Unloading Area

Fig. 6a Traffic and Waste Flow Diagram for Transfer Station and Recycling Pad

Fig. 6b Traffic and Waste Flow Diagram for Transfer Vehicles

Fig. 6c Traffic and Waste Flow Diagram for Collection Vehicles

Integrated Materials Recovery Facility (iMRF)

Select loads containing potentially recyclable material are unloaded at the iMRF tipping floor and then processed through C&D Sort Lines. Prohibited wastes and materials that might jam the conveyor belt are removed by the loader and the materials handlers before they are fed into the sort line. The rest of the material is loaded on to the sort lines in-feed belt where it is conveyed over a shaker screen and then onto a sorting belt, where it is manually sorted for recyclables by the materials handlers.

When potentially prohibited wastes are identified, the work crews and/or WACP staff attempt to return such wastes to the customer, in accordance with procedures approved by the City. This activity provides an opportunity for WACP staff to expeditiously inspect the entire load in an area well-suited for this work.

Prohibited wastes that are not identified on the tipping floor and make it to the sorting belt are identified and removed by sort line workers. Non-leaking sealed containers are stored in tubs located on sort line work surface. Abandoned prohibited wastes found on the sort lines are managed for disposal by WACP personnel.

Transfer Station / Tipping Floor

Vehicles dump their loads from the tipping floor into the pit. In some cases, work crews and WACP staff are able to survey the load when it falls into the pit. When possible, WACP staff or work crews attempt to retrieve detected potentially prohibited wastes, for further management by WACP staff. In addition, an area has been designated in the Transfer Station where loads can be selected at random, dumped and inspected. This area is known as the Waste Inspection Station.

Transfer Station / Loading Bay

The dozer operator and the crane operator are in a position to survey some of the waste as it is being processed for transfer. The dozer operator compacts and moves the waste, while the crane operator in the tower above the waste directs the loading of the transfer trailers. The equipment operators attempt to remove detected prohibited wastes, for further management by WACP staff.

3.4 Waste Inspection Program for Prohibited Wastes

The City and Recology agreed that the primary focus of the waste inspection program during the initial phase of the WACP would be the uncompacted waste stream. During the second year of the WACP, the City and Recology agreed to examine and address the issue of the improper disposal of prohibited wastes in the compacted waste stream and develop programs to respond to this condition. This project, known as the Compacted Waste Stream Project, was implemented November 1, 1990.

Uncompacted Waste

Uncompacted waste arrives at the SFSWTRC in debris boxes and in private and commercial vehicles. The contents of selected debris boxes which contain considerable amounts of recyclable materials are dumped at the Recycling Pad to be run through the C&D Sort Line and separated into recyclable wood, metal, construction debris and non-recyclable waste. Non-recyclable waste is then dumped in the SFSWTRC pit where it is compacted and loaded for transfer to Altamont Landfill.

Waste delivered to the SFSWTRC in private vehicles is directed to the Public Disposal Area of the SFSWTRC. Where possible, recyclable material is removed from this waste stream and the remaining waste is deposited in roll-off boxes which are dumped in the pit for transfer to Altamont Landfill. Self-haul C&D materials are segregated and loaded onto a C&D sort line adjacent and south of the PDRA. Materials handlers remove recyclable materials from a sorting belt. Prohibited wastes found on the sort line are removed, stored in tubs, and managed at the end of the day by WACP personnel.

Customers are provided with information about WACP and SFSWTRC waste acceptance policies. Information concerning the types of waste which cannot be disposed of in the municipal solid waste stream is attached to the side of the debris boxes,

WACP staff randomly select incoming loads of uncompacted wastes for inspection, in accordance with procedures agreed upon by the City and Recology. WACP staff inspect various incoming loads of uncompacted wastes, including loads from both private and commercial sources. An average of five loads per week of uncompacted wastes are inspected and documented by WACP staff, in accordance with procedures agreed upon by the City and Recology. If, in the course of inspection of a load of uncompacted waste, the WACP staff has any doubts concerning the acceptability of a given waste, the WACP staff will require the customer to prove the waste is acceptable.

Each waste inspection is documented by WACP staff and entered into a computer database. A record of each inspection includes the following types of information:

- Date
- Time of inspection
- Location
- Name of hauling firm or vehicle identification
- Address and phone number of source, if known
- Type of business, if known
- Type of prohibited waste identified

Compacted Waste (Compacted Waste Stream Project)

San Francisco's compacted waste stream consists of waste which is compacted either by the equipment with which it is collected (front loader, side loader or rear

loader garbage trucks) or by compactor boxes located at the source of waste generation (e.g., office buildings, hotels, hospitals). Compacted waste may be delivered to SFSWTRC if it consists of solid waste. Compacted source separated recyclables with low residuals are delivered to Recycle Central.

The compacted waste stream constitutes approximately 75% of San Francisco's municipal solid waste stream that is delivered to the SFSWTRC. Including large apartment complexes, 70% of the compacted waste stream is of residential origin. Another 28% of the City's compacted waste originates from large single source and commercial customers. The remaining 2% of the compacted waste stream originates from City cans (i.e. pole baskets and monument cans located on city streets).

Sunset Scavenger and Golden Gate deliver approximately 60% and 40% of the City's compacted waste to the SFSWTRC respectively. Approximately 70% of the compacted waste stream collected by Sunset Scavenger is residential in origin; the remaining 30% is commercial. Approximately 40% of the compacted waste stream collected by Golden Gate is residential, and the remaining 60% is commercial.

Sources of municipal solid waste in San Francisco that contribute to the compacted waste stream include:

- Industries
- Businesses
- Service institutions (e.g. hospitals)
- Households
- San Francisco street cleaning activities and disposal of wastes by the public in City cans

Each of these sources is a potential source of hazardous waste.

A primary focus of the Compacted Waste Stream Project is conditionally exempt small quantity generators (CESQGs)³ of hazardous waste. It is believed that CESQG's accounts for approximately 60% of the total estimated quantity of hazardous waste generated in San Francisco. Many CESQGs are still unaware that they produce hazardous waste or are unable to afford the high cost of legally disposing of such materials and, accordingly are not participating in the existing hazardous waste management system.

The Compacted Waste Stream Project has the following goals:

- To review available information concerning generators of prohibited wastes in San Francisco, and identify categories and types of generators most in need of education.

³ CESQGs are those businesses that generate no more than 1000 kg of hazardous waste per month.

- As necessary or appropriate, to conduct inspections of selected loads of compacted waste.
- To provide information to the general public (e.g. through tours of the SFSWTRC and RC and appearances at fairs and expositions) regarding WACP procedures, the proper disposal of prohibited wastes, and the Household Hazardous Waste Collection Facility (HHWCF).
- To develop reasonable alternatives for generators to safely manage prohibited wastes.
- To educate and train collection personnel on surveillance techniques to identify prohibited wastes in the precompact municipal solid waste stream.
- To encourage generators of prohibited wastes to develop and implement waste reduction and minimization measures.

The City and Recology Company meet on a periodic basis to review and revise as necessary the goals discussed above.

As part of the Compacted Waste Stream Project, WACP staff select and inspect individual boxes from specific single source customers prior to compaction, (these individual boxes are normally collected by front loader trucks). Recology develop procedures for the selection of boxes with the City. In addition, WACP staff inspect (1) compacted waste from single source compactor boxes from various customers and (2) uncompacted waste collected from City cans. WACP staff also inspect individual waste containers from the types of businesses that have been identified as problem customers under the load checking programs of the WACP. Municipal solid waste that is collected in rear loader trucks is currently checked for the presence of prohibited waste by the garbage collectors. Prohibited waste that is found on the routes is tagged with a Garb Tag, and efforts are made to return the waste to the generator and recommend proper disposal procedures. The Garb Tag provides information to the customer about the correct disposal of hazardous wastes in English, Spanish and Chinese.

WACP staff inspect individual containers in response to reports of improper waste disposal from the San Francisco Regional Companies. Inspection of selected loads utilizes existing WACP load checking procedures agreed upon by the City and Recology. WACP staff keep detailed records of the inspections, including but not limited to, (1) date, (2) time of inspection, (3) address of source, (4) type of business, if known, and (5) type, volume, and number of prohibited wastes found. Each documented waste inspection is entered into a computer database by WACP staff. These records provide the City and Recology with information to identify problem generators of prohibited waste, and enable Recology and the City to develop further programs to address the issue of the improper disposal of prohibited waste in the municipal solid waste stream.

As appropriate, the City and Recology develop general notices to the public, regarding load inspections. These notices inform customers that their solid waste is subject to inspection for prohibited waste.

If prohibited wastes are identified during the waste inspection program and the generator is present, WACP staff inform the generator that the wastes cannot be accepted and must be removed from the municipal solid waste stream, in accordance with procedures approved by the City and Recology.

If prohibited wastes are identified during the waste inspection program and the generator is not present, the WACP staff may remove the prohibited wastes from the municipal solid waste stream and attempt to ascertain the identity of the generator. The WACP staff will, with the help of the City, seek to obtain the cooperation of identified generators. Pending the return of prohibited waste to the generator, Recology stores the prohibited wastes in a specially designed Haz Bin, or otherwise manages the wastes in a manner deemed appropriate by the City and Recology.

Recology is authorized by its Permit-by-Rule provisions to store abandoned hazardous wastes in the HHWCF. Any other permits or authorizations to store WACP wastes at the SFSWTRC which may be required in the future by local, state, and federal government agencies will be sought by Recology, with the City's cooperation. During any period of time required to apply for and obtain such permits or authorizations Recology will not, for purposes of the City's assessment of the WACP, be deemed to be in noncompliance with those aspects of the WACP program which, if performed, would result in the unauthorized storage of WACP waste.

Off-Site Inspections

A hazardous materials response van (Haz Van) is available to conduct waste inspections and respond to minor incidents involving potentially prohibited wastes at the SFSWTRC and in the City. The van is outfitted with reference materials, waste characterization equipment, and safety equipment.

Development of Waste Minimization, Disposal and Recycling Programs

Recology and the City work together to identify and develop convenient alternatives for generators to safely manage their prohibited wastes. These alternatives include waste minimization education, reuse and recycling strategies and convenient disposal and recycling programs including: 1) a hazardous waste door-to-door collection service for residents, 2) more than 100 neighborhood drop-off sites for a variety of waste including batteries, fluorescent lights and batteries, and 3) a low cost, subsidized small business hazardous waste disposal program, referred to as the Very Small Quantity Generator Program⁴ (VSQG).

⁴ This program is more commonly known, statewide, as a Conditionally Exempt Small Quantity Generator (CESQG) Program

3.5 Management of Prohibited Waste Found at the SFSWTRC or RC

Prohibited waste discovered as a result of any of the waste inspection activities is separated from the municipal solid waste stream and identified as WACP waste. WACP waste includes: (a) Generator-Identified Waste: prohibited waste that is discovered during a load inspection and the generator of the waste is known; (b) De Minimus Waste: prohibited waste of household origin discovered in small volumes in the municipal solid waste stream and (c) Abandoned Waste: prohibited waste generated by an unidentified person that is either, i) discovered at the SFSWTRC, RC, or ii) discovered as a result of related waste management activities (see Section 4.0), or iii) discovered at facilities operated by the San Francisco Regional Companies. This Section 3.5 describes WACP waste found at the SFSWTRC; Section 3.6 provides a description of the management of WACP waste found at facilities operated by the San Francisco Regional Companies in the course of their waste management activities.

Generator-Identified Waste

If prohibited wastes are found during an inspection at the SFSWTRC and the generator is present, WACP staff inform the generator that the waste cannot be accepted and must be removed from the SFSWTRC, in accordance with procedures approved by the City and Recology.

If the generator is not present, WACP staff track the generator through the San Francisco Regional Companies that brought the load to the SFSWTRC for disposal. WACP staff then contact the generator and ask him or her to manage the waste. If the waste is generated by a business or by a non San Francisco resident, the generator is required to remove the waste. If the waste is of household origin and the generator is a San Francisco resident, the generator is informed that the waste can be taken to the HHWCF. Prior to obtaining the cooperation of the generator, the waste is stored in the WACP Haz Bins located below the HHWCF.

There are two WACP Haz Bins. Each has three compartments, four of which are used to store hazardous waste. Three compartments are used for flammables, and the fourth compartment is divided into acids and bases. The Haz Bins have double containment (grated floor), ample ventilation, and shelving. The Haz Bins are also equipped with emergency fire and spill equipment. Views of the Haz Bins are shown in Waste that is to be returned to the generator is stored in plastic tubs on numbered shelves and the location of the containers is recorded in a computer database.

Fig. 7 Waste Acceptance Control Program Haz Bin

Generator-Identified Waste of Household Origin

If WACP staff find any prohibited wastes while conducting load inspections that are believed to be of household origin, and the generator is known, the following steps are used to allow the waste to be transferred to the HHWCF:

- WACP staff call the San Francisco Regional Company that delivered the waste to the SFSWTRC and ask for the address and name of the customer. From this information, together with any other information gathered about the customer, WACP staff determine whether the waste was generated by a resident or business.
- WACP staff notify the customer that prohibited waste was found in their municipal solid waste. WACP staff ask where the waste was generated to determine the disposition of the waste.
- WACP staff may use the reverse directory to determine where the waste was generated.
- WACP staff may conduct site visits to determine whether the waste was generated by a resident or a business

Prohibited waste that is found through the Curbside Recycling Program and Recycle My Junk (RMJ) Program is deemed by the City and Recology to be of household origin. The HHWCF manages prohibited waste from the Curbside Recycling Program and the RMJ Program according to the procedures approved by the City and Recology.

Management of De Minimus Waste

The City and Recology have designed certain general procedures to streamline the management of de minimus quantities of prohibited waste discovered in the solid waste stream. The goal of these procedures, agreed to by the City and Recology, is to efficiently and properly manage small quantities of typical household hazardous waste without using extensive and costly follow-up procedures agreed to by the City and Recology.

Criteria for Establishing Waste as De Minimus Quantity

To qualify as a de minimus quantity the total volume of prohibited waste in each incident shall not exceed 15 gallons or 125 pounds.

Disposition of De Minimus Quantities of Waste

If prohibited waste is discovered at the SFSWTRC or RC and Recology determines that the waste qualifies as a de minimis quantity set forth above, Recology may choose, at its discretion, to manage the de minimus quantity as:

WACP Waste

If Recology chooses to manage de minimus quantities of prohibited waste as a WACP abandoned waste, Recology shall have no obligation to attempt to track the generator or the origin of the waste. The de minimus quantity of waste shall be handled as an abandoned waste in accordance with the procedures set forth in Section 3.5.4. Recology shall provide for

the disposal of the waste in compliance with all applicable laws and regulations.

Household Hazardous Waste

If Recology chooses to manage the de minimus waste as household hazardous waste, the waste must satisfy the criteria set forth below and Recology must follow the procedures set forth below to verify that the waste is of household origin.

Criteria for De Minimus Quantities to be managed in the HHWCF

1. The quantity of prohibited waste in each situation must not exceed 15 gallons or 125 pounds (the de minimus quantity set forth above).
2. No individual container shall exceed more than 5 gallons in volume.
3. The prohibited waste must be a typical household product. A typical household product means a product made available to the general public at retail outlets. A Good Housekeeping seal is sufficient but not necessary evidence that the waste is a typical household product for the purpose of this section.

Procedures for Establishing Household Origin of Waste

1. WACP staff record the following information where possible: the date and time the waste was delivered to the SFSWTRC, the name of the person checking the load, the company or person that delivered the load, the vehicle identification number, and a description of the prohibited waste found. Waste is listed by category with the size of the container, percent full, total number of containers, and volume recorded. Brand names are also recorded for same-size containers of the same product.
2. If the waste meets the volume and size criteria described above and is a typical household product, WACP staff will verify that the waste came from a residential location using the procedures set forth in (a) or (b) below:
 - a. WACP staff call the San Francisco Regional Company that delivered the waste to the SFSWTRC and obtain the name and address of the customer. The name and address of the customer are recorded to verify that the load came from a residential location.
 - b. Alternatively, WACP staff may obtain information about the source of the waste from the driver. WACP staff then check in the reverse telephone directory and contact the person listed at the address. The person is then asked about the source of the waste. The address, along with the name and phone number of the customer, are recorded to verify that the load was generated by a resident.
3. Except as provided in paragraph 4 below, wastes meeting the volume, size, and household product criteria which have been verified to be from a residential location are transferred to the HHWCF for management as household hazardous waste.
4. De Minimus quantities of waste from a "repeater" are not transferred to the HHWCF unless the repeater signs an affidavit certifying that the waste is

of San Francisco household origin (i.e., the household questionnaire or Special Circumstances Form). For the purposes of these procedures, a repeater is a San Francisco resident who was found to deposit prohibited waste in the solid waste stream within the previous three years and did not collect the waste when requested by the WACP staff.

Record Keeping: All records are maintained by WACP staff for three years and are available to the City upon request. Data is shared with the City when requested.

City Right to Withdraw: The City reserves the right to withdraw its undertaking in this section (i.e., the management at the HHWCF of de minimus quantities of prohibited waste determined to be of household origin) at any time.

Abandoned Waste

Abandoned waste is taken directly to the HHWCF for management according to procedures that have been established by the City and Recology. WACP abandoned waste stored in the HHWCF is marked with yellow paint to ensure that the waste is managed separately from waste delivered to the HHWCF by San Francisco residents.

Abandoned wastes are stored on shelves in the HHWCF until they can be properly characterized, labpacked, containerized, or consolidated into drums which are marked with yellow paint around the lids and sides. All waste is stored in drums in the appropriate containment bay in the HHWCF.

WACP abandoned waste removed to the HHWCF for temporary storage is handled in accordance with the terms and conditions of the DTSC's Permit-by-Rule provisions for the HHWCF, which allows for the storage of WACP loadchecking waste at the HHWCF, in a manner that is consistent with applicable laws and regulations pertaining to the storage of hazardous wastes. The waste is shipped from the HHWCF to appropriate off-site locations for further management within the time period required by law and the Permit-by-Rule provisions. The quantity of combined WACP waste and HHWCF waste stored at the HHWCF shall not exceed maximum quantity storage limits established in the Permit-by-Rule notification to the DTSC.

Recology continues to provide for the disposal, in compliance with applicable laws and regulations, of the hazardous waste described in this WACP document.

Handling Special Wastes

In the event that explosives, compressed gas cylinders, asbestos and medical wastes are found in the municipal solid waste stream and the generator is known, then the generator is required to assume responsibility for the waste and manage it in accordance with all appropriate laws and regulations. In cases

where such wastes are found in the municipal solid waste stream and the generator is unknown, the following procedures are followed:

Explosives: Procedures for handling explosives were developed by Cal-EPA, San Francisco Department of Public Health (DPH), San Francisco Police Department Bomb Squad and Recology. Explosives include, but are not limited to, fireworks, flares, smoke bombs, shotgun shells, and bullets.

When an explosive is found, WACP staff place it in a bucket inside the HHWCF explosive magazine, which is stored inside a shed with one-hour firewalls located in the alcove next to the household facility.

HHWCF staff notify the SFPD Bomb Squad to pick up the explosives, according to procedures outlined in the HHWCF Operations Plan. A log sheet is maintained that records the dates the explosives are received and removed.

Gas Cylinders:

The HHWCF accepts small compressed propane and consumer helium cylinders only. No high-pressure or non-propane/helium cylinders are accepted. Full propane or helium cylinders in good condition are distributed to employees and customers for reuse. Empty cylinders are marked "empty" and recycled as scrap metal. Nearly empty helium cylinders are vented to the atmosphere and recycled as scrap metal. Nearly-empty, outdated, or rusted propane cylinders are stored and transported to a propane cylinder recycling company.

Other types of compressed gas cylinders may be discovered during Loadchecking and are managed by WACP. Marked cylinders in good condition are offered to local cylinder distributors for re-use. Unmarked, unknown, or cylinders in poor condition are stored at the HHWCF and disposed of as hazardous waste.

Medical Waste: WACP staff notify the San Francisco Department of Public Health, package the waste in infectious waste boxes, and arrange for the off-site transportation of the waste for disposal.

Due to reported incidents of needle injuries to sanitation workers, Recology Company helped to develop the San Francisco Safe Needle Disposal Program (SFSNDP). This program, described in provides free needle containers to various pharmacies and health centers throughout the City for use by their customers or other San Francisco residents. Full containers are returned to the pharmacies where they are stored and then disposed of by a medical waste hauling company. The HHWCF is also permitted to distribute and accept needle containers for San Francisco residents

Asbestos: WACP staff wet the asbestos-containing material and put it into special bags dedicated to the management of asbestos. The asbestos-containing

waste is then stored in closed containers until it is shipped to an appropriate landfill for disposal.

3.6 Management of Prohibited Waste Found at Off-Site Locations

Prohibited waste discovered as a result of any solid waste handling activities at the facilities operated by San Francisco Regional Companies are separated from the solid waste stream. The prohibited waste is managed in accordance with the following procedures:

Generator Identified waste

If prohibited waste is found at any of the facilities operated by the San Francisco Regional Companies as a result of their solid waste handling activities, company employees try to identify the generator of the prohibited waste. Staff then contact the generator and ask him or her to remove the waste. If the waste is of household origin and the generator is a San Francisco resident, the generator is informed that the waste can be taken to the HHWCF. Prior to obtaining the cooperation of the generator, the waste is stored in a special designated area at each company, in accordance with applicable laws and regulations.

Abandoned Waste

In situations where the generator cannot be identified, the waste is treated as WACP abandoned. The wastes are removed to appropriate off-site locations for further management within the time period required by law.

Recology will provide for the disposal, in compliance with applicable laws and regulations, of the hazardous waste identified and removed from the municipal solid waste stream by the San Francisco Regional Companies, except where the generator can be identified and the waste returned.

Incidents involving waste abandoned at the perimeter of the facilities operated by the San Francisco Regional Companies are referred to the San Francisco Department of Public Health for further action.

3.7 Programs to Obtain the Cooperation of Recalcitrant Generators

One of the primary goals of the WACP is to ensure that the generators of prohibited wastes assume responsibility for their wastes. The City and Recology believe that placing responsibility for the proper management of prohibited wastes with the generator deters others from sending prohibited wastes to the SFSWTRC or RC. Accordingly, both the City and Recology are developing and implementing programs designed to identify the generators of prohibited wastes, and to encourage such generators to assume responsibility for the proper management of prohibited wastes. These programs include the following:

Programs to be Undertaken by Recology Company

A key feature of the waste inspection program (described above) is to enlist the assistance of identified generators of prohibited wastes in properly disposing of their wastes. When prohibited wastes are delivered to the SFSWTRC or RC and cannot be returned to the generator (e.g. in cases wherein prohibited wastes are (1) discovered after the generator has left the SFSWTRC or (2) have been unlawfully abandoned at the SFSWTRC), the WACP staff take one or more of the following steps to contact the identified generator and seek his/her cooperation in arranging for the proper transportation and disposition of prohibited wastes:

- Make telephone calls to the generator
- Send letters to the generator
- Conduct site visits from the WACP staff to the generator
- Refer the generator to the City and other relevant government agencies

Depending upon the circumstances, some or all of these measures may be employed to obtain the cooperation of the identified generator.

WACP staff also maintain a record of all generators who deliver or attempt to deliver prohibited wastes to the SFSWTRC. WACP staff increase surveillance of municipal solid wastes generated by repeat offenders, and, if necessary, refer such matters to the City for further action.

City Enforcement Programs

A key aspect of the City's role in the WACP is to ensure that identified generators of prohibited waste do not improperly dispose of such wastes in the municipal solid waste stream. The goal of the City's enforcement effort is an effective system for (1) obtaining the informal cooperation of identified generators in proper waste management procedures, and (2) pursuing more formal actions through enforcement of applicable laws, regulations, and ordinances as the enforcing City departments determine are necessary and appropriate.

The following describes enforcement programs of various City departments through which the City assists Recology in reducing the quantity of prohibited wastes placed for disposal in the municipal solid waste stream.

Department of Public Health (DPH): A number of divisions within DPH are charged with enforcing local ordinances which pertain to the management of prohibited wastes. Enforcement of these ordinances supports the WACP programs which the City and Recology develop and implement. DPH programs and enforcement efforts include the following:

Hazardous Materials Certified, Unified Program Agency (CUPA): This department within DPH regulates businesses that store hazardous materials exceeding 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for gases. These businesses must apply for a Certificate of Registration, which is

valid for two years. In addition, businesses that generate hazardous waste must also inform the CUPA.

The City and Recology may access these business files to learn about the types and quantities that businesses store. This information supports efforts to have businesses assume responsibility for the proper management of their prohibited wastes.

Emergency Response and Response to Community Complaints: The CUPA responds to emergencies involving hazardous materials or wastes and investigates community complaints involving hazardous materials and wastes. These response actions may lead to identification of hazardous waste generators engaging in unlawful waste disposal practices.

Enforcement of the Medical Waste Management Act: The Bureau of Toxics, Health and Safety Services, within DPH enforces state laws and regulations pertaining to the management of medical waste. As a part of this program, the Bureau of Environmental Health inspects facilities that generate and dispose of medical waste and investigates complaints of illegal disposal of medical waste. These inspections are conducted by the Bureau of Environmental Health upon receipt of a complaint or upon a request of certain State agencies. Accordingly, Recology or the Solid Waste Management Program continues to refer incidents of alleged improper disposal of medical wastes in the municipal solid waste stream to DPH for investigation and, where appropriate, enforcement action.

San Francisco Public Utilities Commission: The Public Utilities Commission monitors the City's sewer system and pursues enforcement actions against businesses that violate federal, state and local industrial sewage pretreatment standards. Investigation and enforcement actions may identify businesses which engage in the unauthorized disposal of prohibited wastes in the municipal solid waste system.

Fire Department: Various provisions of the City's Fire Code pertain to the storage and management of hazardous, flammable, and combustible materials (including wastes). As part of its responsibilities, the Fire Department may inspect businesses which store such materials and investigate alleged violations of the City's Fire Code. Investigations and enforcement actions conducted pursuant to the City's Fire Code may identify businesses which also engage in the unauthorized disposal of prohibited wastes to the municipal solid waste stream. Thus, administration and enforcement of the San Francisco Fire Code supports efforts by the City and Recology to have businesses assume responsibility for the proper management of prohibited wastes which they generate.

Offices of the District Attorney and City Attorney

District Attorney's Consumer and Environmental Protection Unit: This unit enforces criminal violations of City ordinances and, pursuant to state law, prosecutes criminal and civil cases under the Hazardous Waste Control Act. Referrals pertaining to the alleged improper management of prohibited wastes which are received from various City Departments, Recology, the collection companies, and the public are investigated and, where appropriate, prosecuted by this office.

City Attorney's Code Enforcement Section: The City Attorney's Office enforces civil violations of City ordinances and may bring civil enforcement actions pursuant to state laws that the City is authorized to enforce. Referrals pertaining to the alleged improper management of prohibited wastes which are received from various City departments, Recology, the collection companies, and the public are investigated and, where appropriate, prosecuted by this office.

Department of the Environment: Department of Environment Program staff are responsible, in part, for oversight of the WACP. (See Section 6.1.)

Enforcement: The City has established an environmental crimes unit charged with investigating and pursuing, where appropriate, enforcement actions against persons who illegally dispose of prohibited wastes in the municipal solid waste stream.

Development of Interdepartmental Enforcement Procedures: The Solid Waste Management Program develops and implements interdepartmental protocols, as necessary, for identifying and seeking the cooperation of generators who improperly dispose of prohibited wastes.

4.0 Related Waste Management

A number of waste management activities, sponsored by the City, Recology, and/or the San Francisco Regional Companies, offer opportunities to implement the concepts of the WACP. These activities supplement the WACP and function, in part, to discourage the disposal of prohibited wastes in the municipal solid waste stream. These waste management activities also enable the City and Recology to expand the public's understanding of the need to prevent prohibited wastes from entering the solid waste stream.

Recology's participation in related waste management activities described in this section constitutes a part of its WACP responsibilities, as required by the Facilitation Agreement

Specific activities which encourage proper management of prohibited wastes by generators include the following:

- Recycle My Junk Program

- Gigantic 3 Collection Event
- Curbside Recycling Program
- Very Small Quantity Generator Program
- Waste Reduction Assistance Program
- One-Day Household Hazardous Waste Collection Events
- Door-to-Door Collection Services
- Retail Household Hazardous Waste Collection Sites
- San Francisco Safe Needle Disposal Program

4.1 Recycle My Junk (RMJ) Program Gigantic 3 (Gig 3) Collection Events

RMJ is curbside collection events, available to residents 1-2 per year by appointment. Gig 3 is a neighborhood drop-off event, held in each Supervisorial District once per year.

These programs were developed by the City in cooperation with Recology. Sunset Scavenger and Golden Gate are responsible for the management of the two programs and the collection of the waste generated in connection with them. RMJ provides San Francisco residents with an opportunity to dispose of bulky items, such as furniture, electronic waste, appliances, mattresses tree branches, metal and scrap lumber. Gigantic 3 accepts these items, in addition to used motor oil, fluorescent lights and household-type batteries.

Management of Prohibited Waste

Sunset Scavenger, Golden Gate and the City implement the following steps when prohibited wastes are identified in the course of the RMJ Program:

- Any prohibited waste is moved to a location on the resident's property away from pedestrian and vehicular traffic.
- An attempt is made to return the waste to the resident immediately.
- If the resident cannot be contacted, Sunset Scavenger attaches a Garb Tag to the waste informing the resident that (1) such wastes cannot be delivered to the SFSWTRC, and (2) proper arrangements for disposal must be made. A record of the incident is recorded on the removable portion of the tag and this record is kept on file.
- When emergency situations arise, collection personnel notify WACP staff. Sunset Scavenger personnel remain near the waste until WACP staff arrive to direct appropriate response measures. If WACP staff cannot reach the resident, WACP staff contact the DPH and the appropriate emergency response agencies.
- Where necessary, WACP staff and/or DPH officials refer incidents to the Solid Waste Program Manager and/or the San Francisco Police Department for further action.

If hazardous wastes are inadvertently collected during Super Recycler Day/Gigantic 3, they are transferred to the HHWCF, provided the following criteria are met:

- The containers in which the hazardous wastes are found are 1 gallon or less in volume, and
- The containers in which the hazardous wastes are found are of the type that can be purchased by the general public for home use through retail outlets.

Hazardous wastes that do not meet the criteria set forth above are managed as WACP abandoned waste in accordance with Section 3.5.4.

Recology provides RMJ and Gigantic 3 personnel with training concerning the identification of prohibited wastes and appropriate response measures.

4.2 Curbside Recycling Program

The City, Golden Gate and Sunset Scavenger provide a comprehensive residential recycling program for the residents of San Francisco. The Program includes a combination of curbside or household pick-ups, drop-off centers, and buy-back centers

Collection of materials from the curbside program is the responsibility of Sunset Scavenger and Golden Gate. Paper, cardboard, glass, aluminum, tin, and plastic containers are collected as part of this program, as well as empty metal paint and aerosol cans.

Management of Prohibited Waste

All curbside drivers and material handlers are trained by WACP staff in the identification and management of prohibited wastes. Whenever prohibited wastes are identified by the drivers, they affix a Garb Tag to the prohibited waste explaining why the waste was refused and informing residents that household hazardous wastes should be delivered to the HHWCF.

Since the original contract was signed, the City, Golden Gate and Sunset Scavenger have modified the procedures for handling prohibited wastes that are inadvertently collected during curbside recycling program operations and delivered to Recycle Central. Such wastes are transferred to the HHWCF for further management as household hazardous waste in accordance with HHWCF procedures, provided that the following criteria are met:

- The containers in which the hazardous wastes are found are 1 gallon or less in volume.
- No more than 15 gallons or 125 pounds shall be transferred per month.

- The containers in which the hazardous wastes are found are of the type that can be purchased by the general public for home use through retail outlets.

Wastes which do not meet the criteria set forth above shall be transferred to the HHWCF for management as WACP abandoned waste, according to the procedures described in Section 3.5.4. Records are maintained of wastes transferred to both the HHWCF and the WACP programs.

Outreach is extended to Small Business Recycling customers who recycle through the curbside program to ensure they are informed that hazardous wastes must not be placed in recycling containers.

4.3 Very Small Quantity Generator Program

In conjunction with the City, Recology operates a Very Small Quantity Generator (VSQG) Program for businesses that generate less than 100 kilograms (about 27 gallons, or 220 pounds) of hazardous waste per month. These businesses are also referred to as Conditionally Exempt Small Quantity Generators (CESQG). San Francisco based CESQGs can call Recology to schedule an appointment to bring their wastes to the HHWCF on special VSQG Collection Days, held twice a month on a day when the HHWCF is not open for normal residential service. VSQG businesses typically include painting contractors, small auto repair and body shops and printers.

The City signs the shipping manifests for the off-site treatment and disposal of hazardous wastes brought to the HHWCF as part of the VSQG program.

4.4 Waste Reduction Assistance Program

The City's Department of the Environment (SFE) works with San Francisco businesses and City agencies to implement a Waste Reduction Assistance Program. This program may include:

- Conducting workshops to inform small quantity generators about waste minimization technologies
- Performing waste audits
- Developing checklists for performing self waste audits
- Developing a prioritized list of waste reduction options
- Developing ways to monitor the effectiveness of the program. WACP staff and the City coordinate their efforts to provide small quantity generators with information concerning the minimization and disposal of hazardous waste.

Outreach to the general public regarding waste minimization strategies is also done routinely by SFE.

4.5 One-Day Household Hazardous Waste Collection Events

Occasionally, Recology will hold a One-Day Household Hazardous Waste Collection for residents and other unique audiences (e.g. boat owners) who might not otherwise use the HHWCF. These temporary events are held at various locations throughout San Francisco and on Treasure Island.

4.6 Door-to-Door Hazardous Waste Collection Program

In order to make HHW recycling and disposal convenient for non-driving residents, Recology and the City have implemented an appointment-based home collection service of household hazardous waste. Residents schedule home pickups with dedicated HHW customer service representatives. Hazardous wastes may not be left unattended for pick-up; residents must be present when their waste is picked up. Waste collected from homes is delivered to and processed at the HHWCF.

4.7 Retail Household Hazardous Waste Collection Sites

In addition to the Door-to-Door Program, Recology and the City provide increased convenience for hazardous waste recycling and disposal via the extensive retail-based collection program. Currently, more than 120 neighborhood-based retail stores serve as collection sites for a variety of hazardous products including: latex paint, used motor oil and filters, fluorescent lights, household-type batteries, empty propane tanks and mercury thermometers.

Retail sites are served by the same trucks that collect waste through the Door-to-Door Program. Waste collected from retail sites is delivered to and processed at the HHWCF.

4.8 San Francisco Safe Needle Disposal Program

The San Francisco Safe Needle Disposal Program (SFSNDP) is the culmination of efforts by Recology, the City, and local hospitals and advocacy groups to remove potentially dangerous needles from the household waste stream. Under this program, San Francisco residents can pick up a free sharps container at over 70 participating locations in the City, including Walgreens pharmacies, Kaiser, and General Hospital. After the sharps container is filled, it can be dropped off at any one of these locations for free disposal. The program currently gives out 20,000 sharps containers and disposes of approximately 3 million needles a year.

5.0 HOUSEHOLD HAZARDOUS WASTE COLLECTION PROGRAM

5.1 Purpose

On January 21, 1988, the City and Recology opened the Household Hazardous Waste Collection Facility (HHWCF) as a pilot program. The HHWCF offers the community a safe program for disposing of a variety of household hazardous wastes. Due to the success of this program, the program was made permanent.. Some of the benefits of the HHWCF are:

- Provide San Francisco residents with the opportunity to dispose of small quantities of household hazardous waste
- Develop data regarding the magnitude of the household hazardous waste problem
- Assist in determining permanent and long-term waste management options
- Reduce the potential for injuries to sanitation workers
- Allow examination of the solid waste stream for development of waste reduction or recycling programs

5.2 Operations

The HHWCF is located immediately next to the ADRA (see maps in Appendix 1). Information on the management procedures at the HHWCF is detailed in the 2011 Household Hazardous Waste Collection Facility Operations Plan. A copy of the Plan is on file at the HHWCF.

The HHWCF currently operates under general Permit-by-Rule provisions administered by CUPA. In addition, the HHWCF is required to abide by a Hazardous Materials Storage Permit, which sets waste storage parameters and limits.

6.0 Program Management and Personnel

6.1 Management Structure

The WACP is managed by the WACP Manager under the direction of the San Francisco Regional Manager of Recology. The WACP Manager reports to the Regional Manager on the status and effectiveness of the program and on any proposed modifications to the program.

Prior to implementation, the WACP document was submitted to the San Francisco Board of Supervisors and to the Refuse Collection and Disposal Rate Board (Rate Board) for approval. The Rate Board is responsible for reviewing any material changes in the WACP, to the extent such changes require additional expenditures which affect Recology's maximum lawful rate for refuse disposal. Administration of the City's participation in the WACP rests primarily with the City's Department of the Environment (SFE). The participation of SFE includes:

1. Coordination of the participation of other City offices in the WACP (e.g. the Departments of Public Health, Department of Public Works, the City Attorney's Office, etc.).
2. Development and coordination of enforcement efforts relating to prohibited wastes identified as a result of the WACP
3. WACP program inspections, review, and assessment
4. Development of additional WACP programs, as appropriate, in cooperation with Recology.

6.2 Responsibilities of Waste Acceptance Control Program Staff

The WACP staff consists of a Manager, supervisor, specialists, technicians, coordinators, and other work crews. A description of the WACP staff is presented below.

Regional Manager

Is responsible for the overall management of Recology, including the HHWCF and the WACP.

WACP Manager

Oversees staff and operations of the WACP in areas of employee training and load checking; plans and develops new programs; attends City/company meetings; fosters good relations with Little Hollywood Neighborhood, maintains WACP budget; compiles data and produces reports; supports VSQG, HHWCF and hazardous waste One-Day events as necessary; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

WACP Union Lead Man

Coordinates WACP operations and Recology and directs union work crews who conduct load checking; develops and implements effective methods of waste inspection; develops load checking schedules; supports VSQG, HHWCF, and hazardous waste One-Day events as necessary; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

Chemist Specialist

Analyzes unknown wastes abandoned on property or found through load checking; packages WACP abandoned waste designated for disposal; maintains WACP drum inventories and shipment files; prepares WACP profile sheets and manifests; analyses all unknown wastes; schedules shipments; backs-up load checking; supports VSQG, HHWCF, and hazardous waste One-Day events as necessary; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

Specialist

Prepares and tracks necessary permits; monitors operations for compliance with all environmental laws and regulations; assists customers with waste profiling and disposal of special wastes; conducts weekly WACP and hazardous materials inspections; administers respiratory protection program; supports VSQG, HHWCF, and hazardous waste One-Day events as necessary; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

Technician

Traces waste found through load checking on property to the generator; contacts generator and arranges for collection of waste; informs generator of options to properly manage waste; stores and inventories waste awaiting collection by generator; maintains computer data base of loads checked and the amount of prohibited waste found; participates in public outreach events; conducts random load inspections; properly stores waste that is abandoned on property; inspect compacted loads; neutralizes beverages for discharge into sanitary sewer; supports VSQG, HHWCF, and hazardous waste One-Day events as necessary; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

Hazardous Waste Training

A WACP employee trains employees of the San Francisco Garbage Companies about how to identify hazardous waste, how it may endanger their health and safety, the procedures to follow if found, and the programs in place for its management. Additional OSHA required hazardous waste training is provided by regional company safety departments.

VSQG/One-Day Collection Event Coordinator

Advises customers of hazardous waste generator requirements and waste disposal options for hazardous and prohibited wastes; makes VSQG Day appointments; generates and mails collection day paperwork to customers; supervises hazardous waste staff during VSQG collection days; ensures proper classification and storage of collected wastes; maintains VSQG database; produces monthly and quarterly reports; interacts with local and State agencies; produces and distributes flyers for One-Day events; writes operations plans; notifies agencies; interacts with City and collection event site representatives; responds to hazardous waste incidents on and off property during all hours as member of Hazardous Materials Emergency Response Team.

Work Crew

Employees with responsibilities under the Waste Acceptance Control Program include the following work crew:

- Scalehouse weighmasters
- Material Handlers: PDRA, iMRF, ADRA, RC
- Loader Operators
- Transfer Station Sweepers

- Dozer Operators
- Transfer Station Crane Operators

These positions provide an opportunity for examination of the waste stream for prohibited wastes at various control points throughout the facility. Typical WACP responsibilities of the work crew include the following:

Scalehouse Weighmasters are responsible for checking incoming loads at the scalehouse for potentially prohibited wastes. This includes questioning the driver about the contents of the load. If prohibited wastes are suspected, customers are notified that those materials are unacceptable. Because the visual observation of incoming loads is hindered by the mandatory tarping requirement, additional checks are needed. See below.

Material Handlers oversee the unloading of vehicles, sort wastes for recyclable materials, and assist with directing traffic when needed. Any potential prohibited materials detected are returned to the customer in accordance with procedures approved by the City. Sort line material handlers identify and segregate prohibited wastes found on sort lines at the iMRF, PDRA, and RC. If the source of prohibited waste is unknown, the material is held for examination and management by the WACP staff.

Load checking is undertaken by a lead man from Recology's material handlers, under the supervision of WACP technicians. The responsibilities include inspecting incoming loads of solid waste; identifying and removing hazardous and prohibited waste found; returning waste to the generator where possible; preparing load checking documentation; identifying waste with date and time of arrival and source; storing used oil received for recycling. The material handlers keep the WACP staff informed of their load checking activities and their load checking documentation is passed on to WACP staff.

Loader Operators push waste on tipping floors at the PDRA, iMRF, Transfer Station, ADRA, and Recycle Central. They also load sort lines and debris boxes. Loader operators are located high above the tipping floors and have a good vantage point from which to observe improperly disposed of prohibited wastes. Operators can contact WACP and segregate large amounts of potentially prohibited material from the waste stream.

Transfer Station Sweepers observe incoming loads at the transfer station. They direct traffic within the Transfer Station and watch for potentially prohibited materials or recyclable materials as they are dumped into the pit.

Dozer Operators view the tipping of wastes into the pit. They use dozers to compact and load the waste into the transport trucks. The operator is able to contact WACP and segregate large amounts of potentially prohibited material from the waste stream.

Transfer Station Crane Operators observe the tipping of wastes into the pit and watch the material as it is being loaded into transfer trailers. From this position, the operator may contact WACP and use the crane to pull potentially prohibited materials and recyclable items from the waste stream for appropriate handling.

WACP staff supervise and guide work crews in carrying out their obligations under the WACP. Additional support is provided as needed.

7.0 EMPLOYEE TRAINING

Training for the WACP is tailored to suit each employee according to his or her respective responsibilities under the program. In general, the minimum training required for the various program participants is as follows:

Work Crew

- These SFSWTRC personnel receive initial training by the WACP staff in identifying prohibited wastes. Additional or refresher training is under the supervision of the General Manager.
- Training for these personnel include: (1) procedures for identifying prohibited materials and containers, including asbestos, PCBs, caustics, solvents, flammables, medical wastes, etc, and (2) notification and response procedures.

WACP Technicians

- The Technicians receive the above initial training and, training in the following: (1) education in the effects of hazardous substances on human health and the environment, (2) an overview of relevant regulations and definitions of prohibited waste, (3) waste-handling procedures, (4) procedures and equipment for safety and emergency response, (5) personal protective equipment, and (6) recordkeeping.
- The Technicians receive OSHA 40-Hour Hazardous Waste Operations Training shortly after hire.
- The Technicians are typically given annual in-house refresher training. Additional training is to be provided on an “as-needed” basis.

WACP Manager

- The WACP Manager and Supervisor receive the above training, in the following: (1) waste characterization analysis, (2) methods for the containment and removal of prohibited materials, (3) identification and classification of prohibited materials, and (4) regulatory reporting requirements.
- The WACP Manager and/or Supervisor periodically may attend refresher courses offered by colleges or universities, consulting firms, or professional hazardous waste management organizations. They also may

attend waste management conferences at the discretion of the General Manager of Recology.

Full-time WACP staff are required to undergo a medical evaluation prior to starting work and thereafter on a yearly basis.

8.0 EMERGENCY RESPONSE

8.1 Emergency Assistance from Agencies

The WACP staff evaluates all emergency situations and seeks assistance from emergency-response agencies, as needed. Agencies that may be called upon for assistance, depending on the extent of the emergency, include the following:

- California Highway Patrol
- CHEMTREC (Chemical Transportation Emergency Center)
- HAZMAT Emergency Response Unit of the San Francisco Fire Department
- Poison Control Center
- San Francisco Fire Department
- San Francisco General Hospital (Emergency)
- San Francisco Department of Public Health
- San Francisco Police Department
- California Department of Public Health Radiologic Health Branch

8.2 Emergency Procedures

Emergency response procedures are undertaken by trained WACP staff, or the Recology work crews (in the event of a release of prohibited or hazardous materials or other emergency situations not involving prohibited material). If necessary, public agencies with responsibilities for emergency response may also be called upon for assistance. Current WACP staff have received 32-hour Incident Command System Training.

Although specific response actions depend on actual hazard conditions, the general actions undertaken in the event of a release or an emergency include the following:

- Removal of unauthorized persons from the area until cleanup has been completed
- Notification of response personnel and/or relevant public agencies
- Immediate response by trained personnel properly equipped with protective devices
- Mitigation of the hazard
- Containment and removal of the waste from the area
- Documentation of the incident

A copy of the Recology Company Emergency Response Plan is filed with CUPA, covering basic evacuation and emergency response procedures. A more detailed plan, specifically tailored to hazardous waste incident responses, has been incorporated into the HHWCF Operations Plan for the hazardous waste staff.

8.3 Emergency Equipment

A variety of emergency and safety equipment is located throughout the property, including fire hoses, fire extinguishers and, emergency alarms. The following emergency equipment is available at the HHWCF and is checked weekly to insure that equipment is present and operational:

- Running water and hoses
- Fire extinguishers
- Communication equipment
- First aid kit
- Safety shower/eyewash
- Personal protection equipment
- Hazard characterization kit (i.e., WICT)
- Hazardous waste containers
- Noncombustible absorbent material
- Barrier cones and caution tape to barricade an area
- Plug and dike material
- Absorbent pads and pillows
- Decontamination solutions
- Hazardous materials recovery containers with lids
- Plastic tarps
- Aluminum shovels
- Brooms
- Plastic bucket
- Drum pump
- Carts and tubs
- Basic tool box
- SCBAs
- Draeger air monitors
- Handheld radiation monitors

The following emergency equipment is available to the WACP staff and is part of the regular inventory used to supply the hazardous materials response van:

- Absorbent material
- Fire extinguishers
- Communication equipment
- First aid kit
- Personal protection equipment
- Hazard characterization kit (e.g., WICT)
- Plastic bags

9.0 RECORDKEEPING

The WACP program generates a variety of records, including those required by applicable regulations and operating permits. Such records are maintained by WACP staff in compliance with applicable regulatory requirements. In addition, they provide a data base for use in evaluating the WACP program.

Records compiled as a result of WACP activities are available to the appropriate City agencies upon request.

Records maintained by the WACP staff include:

- Permits and variances
- Surveillance / waste inspection documentation
- Incident records
- Training records
- Hazardous waste shipment records

A brief description of the nature of selected records and/or reports is presented below.

Permits and Variances

Copies of all applicable permits and variances are maintained by WACP staff where necessary.

Surveillance / Waste Inspection Documentation

Site surveillance and waste inspections are documented by WACP staff. Facility records of surveillance and inspections include, but are not limited to the following information:

- Date
- Time of inspection
- Location at which the inspection was conducted
- Name of hauling firm or vehicle identification
- Address and phone number of source, if known
- Type of business, if known
- Type of prohibited waste identified
- Type of alleged activity at issue (e.g. dumping, leaking, spillage)
- Brief summary of the incident.

These records are stored in a computer database especially designed to meet the needs of the WACP. Surveillance/waste inspection activities are summarized monthly and are made available to City agencies. In addition, WACP staff maintain a list of customers who repeatedly attempt to dispose of prohibited

wastes in the municipal waste stream. Appropriate action is taken by the City and Recology when customers repeatedly fail to observe established protocols.

Incident Records

Records of any emergency or special incident are maintained for at least 3 years, or for any other minimum retention period required under applicable law, whichever is longer.

Training Records

As described in the Employee Training Section (7.0), the WACP staff and work crew are required to successfully complete a training program with periodic refresher training. Training records documenting the successful completion of this program are maintained at the Recology offices for a period of 3 years.

Training session records identify:

- Topics covered
- Date of the training session
- Length of the course
- Instructor's name and title
- Employee's names and job titles
- Documentation by the trainer of successful completion.

See Appendix D for an example of the training records.

Hazardous Waste Shipment Records

All records pertaining to the shipment of hazardous waste that was found through WACP activities are kept on file at Recology. The records include waste profiles, shipment manifests, drum inventories and results from any analysis including WICT results conducted on different wastes.

10.0 PROGRAM ASSESSMENT

The following assessment procedures are recommended: (1) periodic evaluation of the WACP by the City and Recology, (2) periodic review of WACP records and activities, and (3) comparison evaluation with other community programs, and (4) cost assessments.

The City and Recology also meet regularly to develop additional means for evaluating the surveillance, inspection, and management of prohibited wastes by the WACP. Such evaluation forms a part of the City's assessment of the WACP. For example, the City, with the assistance of Recology, may design, develop and review studies concerning: (1) the disposal of prohibited wastes in the compacted waste stream and, (2) the efforts of Recology's major customers to identify and remove prohibited wastes from the compacted waste stream. (If these studies result in major costs, approval of the San Francisco Collection and Disposal Rate Board may be required.) Such studies may be used by the City to make

recommendations to Recology regarding the training programs that Recology provides to its major customers.

10.1 Periodic Evaluation of WACP

The City and Recology meet periodically to discuss the status of the program and the need, if any, for substantive revisions to WACP procedures. Periodic evaluation is conducted according to the guidelines set out in Section 1.1.

10.2 Review of WACP Records and Activities

In order to determine that Recology has materially complied with the WACP, the City may conduct reviews of the WACP, including but not limited to, review of the records and forms maintained in accordance with the WACP and observation of activities carried out pursuant to the WACP. This review is similar to the City's periodic review of the HHWCF. The City has access to files and records generated by the WACP staff pursuant to the WACP. Records are checked for completeness and accuracy. After each review, Recology shall be deemed to have complied in all material respects with the WACP for the current timeframe. Recology is notified in writing within twenty-five (25) calendar days of the being reviewed that it has failed to comply with the WACP in a material way. The particular alleged material failure, if any, shall be identified and explained. In the event that (1) the City determines that there has been a material failure to comply with the WACP, and (2) Recology disagrees with that determination, the City's determination shall be submitted to arbitration for resolution. The determination of the arbitrator, which shall be selected jointly by the City and Recology, shall be final and binding. The burden of proof of compliance rests on Recology in any arbitration proceeding.

If it is ultimately determined pursuant to the provisions of the foregoing paragraph that Recology has materially failed to comply with the WACP, the question of whether such failure directly and proximately causes a claimed liability for which Recology seeks reimbursement pursuant to the Facilitation Agreement shall be left to proof at the time such a claim arises.

10.3 Assessment of Enforcement Programs

As part of its assessment of the WACP, SFE staff consults with Recology to determine whether existing enforcement programs adequately support Recology's efforts to identify and obtain the cooperation of generators who improperly dispose of prohibited wastes in the municipal solid waste stream. Where appropriate, as determined by SFE staff, the development of additional programs or interdepartmental procedures to improve the City's enforcement efforts is proposed. SFE also recommends to the appropriate enforcing authorities or legislative bodies additional programs or laws that it determines are desirable to support the City's and Recology's efforts with respect to the WACP.

10.4 WACP Cost Assessment

The WACP program assessment also includes a periodic review of operating costs. This review may include an examination of the cost-effectiveness of various WACP activities if the costs of such activities are readily quantifiable. Changes to the WACP are evaluated to determine which of the following potential impacts on costs might occur: (1) minor cost changes with no significant impact on collection rates, (2) significant changes with no impact on collection rates, and (3) significant changes that would require a rate increase.

As provided for in the Facilitation Agreement, all costs incurred in connection with the transportation, processing and disposal of prohibited wastes, including but not limited to, potential investigative and remedial costs arising out of environmental responses required by local, state or federal law, are to be included in operating expenses for Recology for rate-making purposes or, if the cost is extraordinary, reimbursed directly to Recology from the Reserve Fund, established pursuant to paragraph 5 of the Facilitation Agreement, so long as Recology has materially complied with the WACP.

Access to the Reserve Fund shall be allowed in the same manner established for access to the impound account previously created by the Rate Board for other funding purposes.

