

# **Construction and Demolition Inert Processing Operations**

## **Compliance First: Evaluation of Solid Waste Facilities' State Standards**

**Training Provided By:**

***California Integrated Waste Management Board (CIWMB)***

# Introduction

- Facilities that receive and process and dispose of construction, demolition and inert material must meet specific standards of operation.

# A Multi-step Process

CDI facilities perform various tasks including:

- 1) Receiving
- 2) Collecting
- 3) Transporting
- 4) Storing
- 5) Transferring or Processing

# Top Violations

- *T14 17383.3(b)(1)*      *Storage of Unprocessed*
- *T14 17383.3(k)*      *Weight Records*
- *T14 17408.7*      *Personnel Health and Safety*
- *T14 17410.1*      *Solid Waste Removal*
- *T14 17414*      *Record Keeping Requirements*

# Storage of Unprocessed Material

## 14 CCR § Section 17383.3(b)(1)

- *(b) All of the following requirements for the storage and stockpiling of C&D mulch feedstock, material being processed and finished C&D mulch apply:*



# Storage of Unprocessed Material

## 14 CCR § Section 17383.3(b)(1)

- *(1) Unprocessed feedstock may be stored on site prior to processing up to 30 days. Unprocessed feedstock stored for more than 30 days shall be deemed to have been unlawfully disposed, and therefore subject to enforcement action including the use of a Notice and Order as provided in section 18304.*



# What are Some of the Problems?

- What are some of the problems associated with long-term storage of these materials?
  - Flies
  - Rodents
  - Other vectors
  - Fire Hazard



# What Triggers a Violation?

- Exceeding storage limits
- Indicators of excessive storage time:
  - Flies
  - Rodents
  - Other vectors
  - Fires
  - Anything else?

# Weight Records

## 14 CCR § Section 17383.3(k)

- *(k) Each operator shall determine the weight of all material received at the operation or facility for handling and shall maintain records of the weight of materials in accord with State Minimum Standards. Weight shall be determined by the use of scales which may be located at the operation or facility or off-site.*

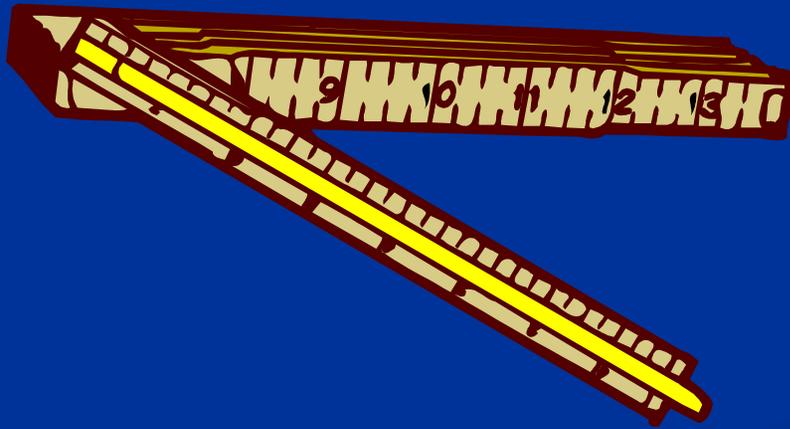


### Note:

New Disposal Reporting System regulations were adopted by the Board in June, 2005, removing the scale requirement at transfer processing operations and facilities. Scale requirement will probably be removed for CDI as well.

# What is Required?

- What kind of scale is required to meet this standard?
- Is a scale even required?



# No Scale?

- If the facility doesn't have a scale, what are some alternatives?
  - Loads can be measured to determine volume
  - Specific vehicle types can be assigned a "typical" payload volume
  - Any other methods?





# Is the IIPP Adequate?

- The requirement to have an IIPP may result in violations for facilities that don't have one. But what about those facilities that have an inadequate IIPP?



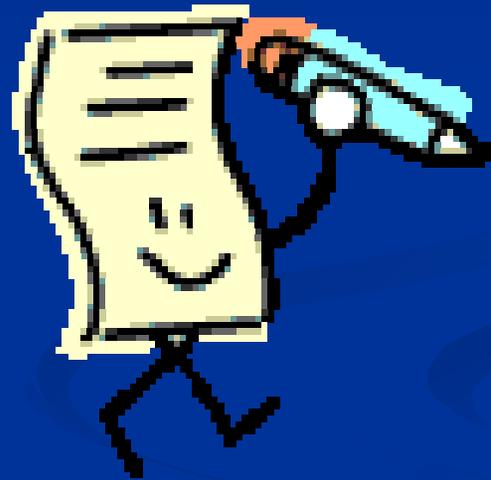
# What's Required?

- What are the minimum requirements for the Injury and Illness Prevention Plan (IIPP)?
  - Hearing conservation
  - Personal protective equipment
  - Hazard communication
  - Confined space entry
  - Emergency eyewash
  - Bloodborne pathogens
  - Lockout tagout
  - First Aid
  - Anything else?



# Referral to CalOSHA?

- Are the LEAs making referrals to CalOSHA?
- Check out Advisory 59



# What Triggers a Violation?

- No IIPP
- Inadequate IIPP
- IIPP unavailable
- Anything else?



# Solid Waste Removal

## 14 CCR § Section 17410.1(a)

- *(a) All solid wastes shall be removed at the following frequencies or at an alternate frequency approved by the EA, in order to prevent the propagation or attraction of flies, rodents or other vectors:*



# Solid Waste Removal

## 14 CCR § Section 17410.1(a) (1) & (2)

- *(1) operations shall remove solid wastes accepted at the site within 7 days from the date of receipt;*
- *(2) facilities shall remove solid waste accepted at the site within 48 hours from the time of receipt.*



# Record Keeping Requirements

## 14 CCR § Section 17414(a)

- *(a) each operator shall maintain records of incoming weights or volumes and outgoing salvage or residual weights or volumes in a form and manner approved by the EA. Such records shall be: submitted to the EA or CIWMB upon request; be adequate for overall planning and control purposes; and, be as current and accurate as practicable;*



# Record Keeping Requirements

## 14 CCR § Section 17414(b)

- *(b) all records required by this Article shall be kept by the operator in one location and accessible for three (3) years and shall be available for inspection by the EA and other duly authorized regulatory agencies during normal working hours.*



# Record Keeping Requirements

## 14 CCR § Section 17414(c)

- *(c) the operator shall submit copies of specified records to the EA upon request or at a frequency approved by the EA;*

# Record Keeping Requirements

## 14 CCR § Section 17414(d)

- *(d) the operator shall maintain a daily log book or file of special occurrences encountered during operations and methods used to resolve problems arising from these events, including details of all incidents that required implementing emergency procedures. Special occurrences shall include but are not limited to: fires, injury and property damage, accidents, explosions, receipt or rejection of prohibited wastes, lack of sufficient number of personnel pursuant to section 17410.2, flooding, earthquake damage and other unusual occurrences. In addition, the operator shall notify the EA by telephone within 24 hours of all incidents requiring the implementation of emergency procedures, unless the EA determines that a less immediate form of notification will be sufficient to protect public health and safety and the environment*

# Daily Log Includes:

- Special occurrences
  - Fires
  - Injuries or Property damage
  - Accidents
  - Explosions
  - Receipt or rejection of prohibited wastes
  - Lack of sufficient No. of personnel
  - Flooding or earthquake damage
- Methods used to resolve problems
- Details of all incidents that require emergency procedures



# Record Keeping Requirements

## 14 CCR § Section 17414(e)

- *(e) the operator shall record any written public complaints received by the operator, including:*
  - *(1) the nature of the complaint,*
  - *(2) the date the complaint was received,*
  - *(3) if available, the name, address, and telephone number of the person or persons making the complaint, and*
  - *(4) any actions taken to respond to the complaint;*



# Common Complaints

- Let's take a poll. What public complaints are most common?
  - Dust
  - Noise
  - Traffic
  - Odor
  - E-waste
  - Asbestos containing waste
  - Other?



# Record Keeping Requirements

## 14 CCR § Section 17414(f)

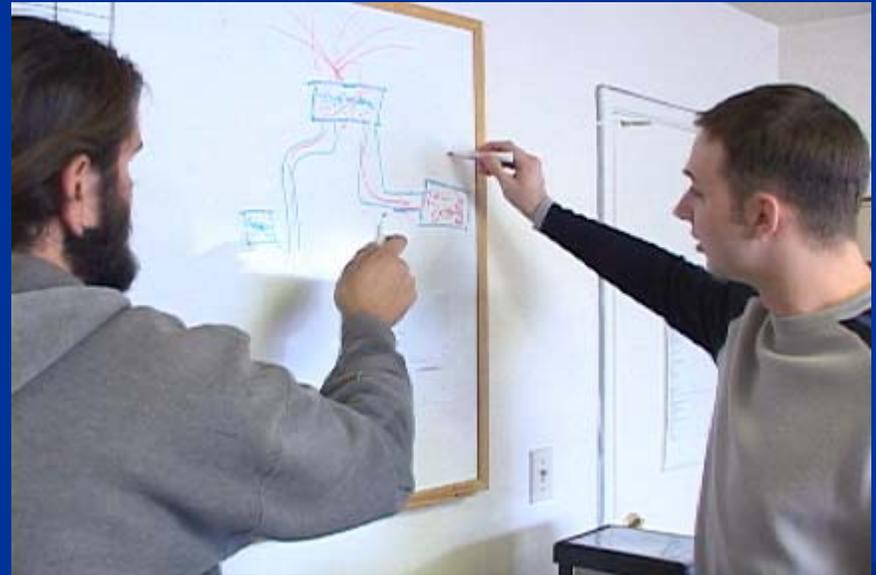
- *(f) the operator shall maintain a copy of the written notification to the EA and local health agency of the name, address and telephone number of the operator or other person(s) responsible for the operations as required by section 17410.2*



# Record Keeping Requirements

## 14 CCR § Section 17414(g)

*(g) the operator shall maintain records of employee training as required by section 17410.3 ...next page*



# Training

## 14 CCR § Section 17410.3

- *17410.3. Training.*

*Personnel assigned to the operation or facility shall be adequately trained in subjects pertinent to site solid waste operations and maintenance, hazardous materials recognition and screening, use of mechanized equipment, environmental controls, emergency procedures and the requirements of this Article. A record of such training history shall be maintained and made available for inspection.*

# Training Topics

- Site solid waste operations and maintenance
- Hazardous materials recognition and screening
- Use of mechanized equipment
- Environmental controls
- Emergency procedures
- Other Code requirements



# What Triggers a Violation?

- No training
- Insufficient training
- No training records
- Training records not available

# Wrap up Questions?

- Any questions on facilities that handle Construction, Demolition and Inerts?
- How about some examples of what you see out there in the real world?

