



<i>Environmental Guideline</i> Management of Abandoned Waste	
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Activity Description
The City and County of Denver DEH, EQ provides assistance to Denver residents and other CCD agencies, primarily Solid Waste and Denver Fire Department, who find abandoned chemicals/waste/spills in alleys, right-of-ways and dumpsters. The purpose of the program is to properly manage and dispose of abandoned chemicals/waste and to remediate, as necessary, spills and releases of suspect hazardous materials from leaking containers and dumpsters.

Potential Environmental Risks
The following environmental concerns are associated with this activity:
<ul style="list-style-type: none"> • Water pollution • Land pollution • Air pollution & odors • Improper or inappropriate disposal of Wastes • Storm water pollution • Improper disposal of contaminated spill response media • Release of fluids to sanitary and/or storm sewer systems • Contamination of soils • Contamination of surface water • Contamination of ground water
Potential consequences from performing the activity incorrectly:
<ul style="list-style-type: none"> • Property damage, personal injury, damage to the environment.

Critical Operating Requirements
A. General Requirements
Prohibited Activities
<ul style="list-style-type: none"> • Intentional release of a hazardous solid or liquid onto the ground, including a public right-of-way, and into a storm sewer conveyance. • Spills of any kind shall not be washed into any sewer system or waterway, or on to any soils. • Discharge of the following materials down any drain is prohibited: <ul style="list-style-type: none"> ○ Any oils or grease, including engine fuel, motor oil, lubricants, greases, coolants, antifreeze ○ Pesticides, including insecticides, herbicides, fungicides, and rodenticides, and fertilizers and other, lawn and garden nutrients ○ Solvents, cleaning agents, detergents, ammonia, bleach, waxes ○ Refuse (paper, plastic, wood, textiles, food scraps, cooking oil or grease, etc.) ○ Heavy metals (lead, magnesium, cadmium, aluminum, tin, copper, etc.)

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- Water treatment chemicals (salt, chlorine, hydrochloric acid)
- Sediment
- Animal waste
- Generally prohibited discharges as specified by Metro Wastewater Reclamation District & DWMD

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Critical Operating Requirements

A. General Requirements

General Considerations
If chemicals or wastes are found abandoned in an alley, right-of-way, or dumpster, a Denver resident or Solid Waste may contact EQ and request an investigation. If the inspector finds that the complaint is founded, he or she will follow EQ *Abandoned Waste Guidance*. If deemed necessary, the inspector may initiate a job request to one of CCD’s on-call hazardous waste contractors for removal, clean-up, and proper disposal of waste and associated materials.

Training Requirements

- Individuals that handle or manage hazardous wastes should receive training in accordance with all applicable State and Federal requirements for hazardous waste operations and emergency response (HAZWOPER).

Storage & Material Handling Requirements

- Maintain legible labels and markings on all containers.
- Ensure that all containers are in good condition and not leaking.
- Follow additional conditions and limitations as stated in *Abandoned Waste Guidance*.

B. Planning Requirements *Responsible: <responsible party>*

B1. Ensure that inspectors are equipped with appropriate PPE and a City-owned truck, in the event it is deemed safe and appropriate to pick up and transport the abandoned materials.
B2. Adhere to the limitations on maximum volumes of material that can be transported in a City vehicle as indicated in *Abandoned Waste Guidance*.

C. Critical Tasks *Responsible: <responsible party>*

C1. Inspectors will conduct investigations in a safe manner.
C2. No chemicals/waste will be transported if the container is leaking or not properly sealed.
C3. Inspectors must observe the conditions and limitations as stated in *Abandoned Waste Guidance*.

D. Emergency Response *Responsible: <responsible party>*

D1. If a spill occurs, refer to Environmental Guideline Spill Response.

- **Call 311 immediately (during normal business hours) or at 303-206-0001 after normal business hours for all spills.**

D2. Control spills to minimize property damage and eliminate imminent risk to human health and the environment.
D3. Containerize all collected wastes and evaluate for labeling, storage and disposal.

E. Inspection & Maintenance Requirements *Responsible: <responsible party>*

N/A

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Expected Records / Outputs	
<u>Record / Output</u>	<u>Instructions</u>
For DEH staff only: Complaint form to be completed upon investigation.	Forms are in EP Main Menu database under Environmental Complaints. Complete form (in database) and return hard copy to Admin for filing.
For DEH staff only: If CCD's hazardous material contractor is tasked to perform remediation and/or transport & disposal of abandoned materials, a job number must be generated, job request and put project cover sheet in ER file. 1) First, generate a job number: <ul style="list-style-type: none">• Open Job Log 2000 R:\Apps\AccessDB\joblog2000.mdb• Click on "Enter a new job"• On the Job Log Data Entry screen fill in the record, tabbing from field to field:<ul style="list-style-type: none">• Scope/Subproject: ST; Emergencies/Orphans• Facility ID: if appropriate• Job Name: brief description of job• Address information• Get the job number from the upper right hand field.• Click "Exit Database". 2) Next, call the contractor (follow the Abandoned Waste Guidance) <ul style="list-style-type: none">• Determine if the job request is an emergency response (ER) or a rapid minor (RM).• Give the contractor the job number and other relevant information.• Follow up the verbal request with an e-mail request, including the job request details (see below).	See instructions below:

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Expected Records / Outputs

- 3) Next, generate a job request:
- Open Facility Compliance 2000 database ("R:\Apps\AccessDB\Facility Compliance 2000.mdb").
 - Under the Objects menu, open New Project Entry Form to create a new record.
 - Tab through the fields, entering the following information:
 - ❖ Facility: **Other – ER**
 - ❖ Project Category: **Hazardous Waste Disposal**
 - ❖ Scope: **Environmental Services**
 - ❖ Project Description: enter **location and job description**
 - ❖ Comments: enter **date and time complaint called into this department and who called it in: citizen, solid waste, etc. Also include your hazmat contractor’s name and the date and time the request was made verbally to the contractor.**
 - ❖ Contact: enter **your name and contact number(s).**
 - ❖ Assigned to: **enter hazmat contractor**
 - ❖ Priority: **1**
 - Exit the database to save the new project record
 - Still in the Facility Compliance Database, under the Objects menu, open Macros
 - Pick the correct macro corresponding to the contractor selected to perform the task. In most cases this will be Macro5 – Job requests to be sent to RMCAT. Double click on your macro selection.
 - Enter the due date in the pop-up window "Customer98.DueDate.
 - The job request will appear, then the e-mail message to be sent. Make sure you are sending to the correct contractor.
 - Hit Send.
 - You will get a message: "You are about to run an update query....." Hit yes
 - You will get a message: "You are about to update....." Hit yes.
- Still in the Facility Compliance Database, under the Objects menu, open Forms and select 2001 Project cover sheet.
- Go to the last one, it should be yours.
 - Click File on the tool bar
 - Print
 - Print Selected Record
- Put the project cover sheet in the 2008 (or appropriate year) "ER" file.

References

Phone Numbers

- **311 (for Spill Reporting during normal business hours).....3-1-1**
- DEH DEQ Emergency Response (after normal business hours)..... (303) 206-0001
- Paul Bedard (DEH DEQ) (720) 865-5473 or (303) 880-9865

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References

Guidance Materials (list not limited to the following)

- *Abandoned Waste Guidance*
- Container label.
- MSDSs

Training Materials (list not limited to the following)

- RCRA and HAZWOPER training materials for handling Hazardous Wastes

Related Environmental Guidelines (list not limited to the following)

- CCD-301-03.26 Spill Response
- CCD-301-03.10 General Regulated Waste Management

Applicable Regulations (list not limited to the following)

- CCR 1007-3, Part 261 State RCRA Regulations
- CCoD Ordinances, Chapter 48, Solid Waste
- Denver Wastewater Management Division Rules & Regulations

Other Documents

N/A

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