

Written Waste Management Plan Elements

Purpose

Companies generating waste must develop a waste management plan to address how waste will be managed on site, stored, labeled, manifested and which waste disposal/recycling companies have been identified to accept their waste. The company generating the waste assumes the liability or responsibility for handling, manifesting or determining the final disposal location for generated wastes.

The plan must be written in accordance with local, state and federal regulations and be fit for purpose to the contractor performing the work or activities on site. All primary and secondary waste streams must be identified and a procedure should be developed to properly manage them on site, through transportation and finally to the final destination for recycling or disposal.

These procedures must be communicated to all personnel to ensure that wastes are being properly handled and not mismanaged. If selected personnel have specific roles and responsibilities, they should be communicated and determined that the selected personnel understand their responsibilities and are adequately trained to do so.

The plan should be reviewed periodically and updated if waste streams are added, re-classified or procedures or regulations change. Some examples of what the plan should address are as follows:

- General statement regarding commitment to Waste Management
- Identification of potential waste streams generated (process wastes, maintenance wastes, spill clean-up wastes, etc)
- Procedures for classification of waste (i.e. MSDS, process knowledge, lab testing)
- On-site management requirements (i.e. packaging, labeling, storing requirements)
- Transportation considerations (i.e. manifests, proper containers, shipping papers, DOT Hazmat applicability, transportation arrangements)
- Waste Recycling/Disposal facilities must be identified for all waste streams generated
- Waste training frequency and requirements if needed
- Revision log to document any updates to the plan required by regulatory changes or management