LONG
PAINTING COMPANY

ENVIRONMENTAL
Policy and Procedures

LONG PAINTING COMPANY

CORE VALUES

OUR EMPLOYEES	Life comes first. We are committed to the safety and welfare of our employees and their families and treat everyone with fairness, respect, and compassion while encouraging personal growth and professional development.
OUR CUSTOMERS	We are committed to building and maintaining solid relationships with our customers and ensuring we are always respectful, responsible, and responsive to their needs.
OUR REPUTATION	We will always do the right thing with unquestioned integrity and endeavor to be the very best managed company in our industry with a commitment to always performing quality work while being a respected corporate citizen.
OUR FUTURE	Decisions will be made with long term perspective in mind, analyzing risk and rewards to sustain our reinvestment in the company and encourage our employee's growth.

VISION + VALUES = CULTURE

Culture is the personality of the organization.

OUR MISSION

To provide customers with quality painting and related contracting services while providing a safe workplace for our employees, safeguarding the environment and the public, and receiving a fair return on investment.

"YOUR PARTNER IN SAFETY, QUALITY, AND SERVICE."

Bill Newcomb
President

Alan Langer
Chief Financial Officer

1. POLICIES

1.1 Areas of Company Activities This Policy Affects

Field Work Under Direction of Project Manager

Long Painting Company (LPC) subcontracts jobs at field site locations. Each job is assigned to an individual or group of individual employees, (Managers, Superintendents and Foremen). The assigned employees are termed the “Project Management Team”. The Project Management Team and each individual employee’s functions and responsibilities will be defined at the beginning of each job. Although all employees on the Project Management Team are responsible for environmental compliance, the designated Project Manager has the lead responsibility for compliance with all federal, state, and local environmental laws and regulations applicable to the jobs under their control. It is the responsibility of the Project Manager to ensure that all environmental factors are taken into consideration when working up a work plan. Before the project commences, consideration shall be given as to each project’s anticipated waste streams and how each will be managed.

This includes, but is not limited to:

- Trash
- Scrap material
- Waste paint
- Thinners
- Paint buckets
- Spent abrasives

This task shall be completed prior to mobilization of the equipment.

Facility Work Under the Direction of the Service Center Manager

LPC operates warehousing and equipment maintenance facilities in Kent and Vancouver Washington. These facilities are each assigned a Manager who is responsible for the facilities and all work that is done at the facilities. The assigned Manager is responsible for compliance with all federal, state, and local environmental laws and regulations applicable to the facilities under their control.

1.2 Pollution Prevention/Waste Minimization/Recycling

LPC places a high priority on utilizing equipment, materials, and techniques to effectively minimize emissions of pollutants to the environment, to minimize the generation of waste and to consider viable options for recycling.

1.3 List of Potential Regulatory Agencies

U.S. Environmental Protection Agency (EPA)	The EPA has the environmental regulatory authority for the USA.
Washington State Department of Ecology (DOE)	The DOE has the environmental regulatory authority for the State of Washington as defined by the Washington State Administrative Code (WAC).
Oregon Department of Environmental Quality (DEQ)	The DEQ has the environmental regulatory authority for the State of Oregon including air and air quality.
City of Seattle Public Utilities (SPU)	The SPU has regulations pertaining to stormwater pollution prevention.
City of Kent Washington	The City of Kent has regulations pertaining to stormwater pollution prevention.
Puget Sound Clean Air Agency (PSCAA)	The PSCAA regulates air quality and air emissions in the four county Puget Sound region of the State of Washington comprising of King, Pierce, Kitsap and Snohomish counties.
Southwest Clean Air Agency (SWCAA)	The SWCAA regulates air quality and air emissions in the southwestern counties of the State of Washington.

Long Painting

Hazardous Materials Spill Contingency Plan and Emergency Procedures

In accordance with

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
HAZARDOUS WASTE REGULATION
40 CFR, PART 112

and

DEPARTMENT OF ECOLOGY
DANGEROUS WASTE REGULATION
WAS 173-303-330

2. SPILL CONTINGENCY AND EMERGENCY RESPONSE PLAN

2.1 Purpose

The purpose of the Spill Contingency Plan and Emergency Response Plan is to establish operating requirements and procedures for protecting the health and safety of responders and to minimize adverse environmental impacts resulting from hazardous material spill incidents. This document is site-specific for LPC facilities and jobsites and includes safety information, instructions, and procedures. As hazardous waste generator, who stores hazardous waste for less than 90 days, LPC is required by the United States Environmental Protection Agency (EPA) Hazardous Waste Regulation 40CFR, Part 112 and WAC 173-303-330 (Washington), to maintain a Spill Contingency Plan and Emergency Response Plan.

An objective in the preparation of this plan is to assure that facility and equipment design and operating procedures are adequate to prevent the discharge of paints, solvents, oils, fuels, or waste materials into the air, soil, surface and/or ground waters during routine operations and/or an emergency. The emergency procedures contained herein are intended to lessen the potential impacts created by an emergency circumstance and to supplement protective design features incorporated in facilities and equipment. This plan is effective immediately and the emergency procedures must be strictly followed in emergency circumstances.

This document meets the intent of federal and state regulations regarding spill prevention and emergency procedures for oils and/or potentially hazardous materials. This plan has been prepared and reviewed by qualified personnel for each anticipated hazardous substance response. This plan is reviewed annually to keep it current and technically correct.

2.2 Policy

LPC is committed to protecting its employees, the community and the environment from adverse impacts that could result from company operations. The operations conducted by LPC necessitate that potentially hazardous materials be utilized that could have adverse impacts under unanticipated conditions. Accordingly, the Company is committed to utilizing best management practices and technology; assuring compliance with regulatory guidelines established under federal, state and local laws; and conducting operations with the spirit of “good neighbors.”

Each employee performing waste management will be trained in proper waste handling procedures. Managers will ensure that LPC complies with the requirements of applicable codes, standards and regulations.

LPC management will strive to utilize the best operating procedures and technologies, ensure commitment toward compliance to environmental protection and protect the health and safety of our employees and the community.

Note: Regarding terminology, terms such as hazardous material(s), hazardous waste(s), dangerous waste(s), and corrosive(s), have strict definitions when used in technical documents and/or regulations. It is the position of this Company that any material that is used in a manner or amount that may adversely impact employees, the public, or the environments shall be regarded as hazardous. Any material that is potentially hazardous is subject to the instructions and guidelines contained herein.

2.3 General Instruction

This document addresses potential site emergencies/occurrences that require immediate actions to prevent additional problems or harm to responders, the public, the property or the environment. Unpredictable events such as fire, chemical exposure or physical injury may occur and must be anticipated and contingency planning conducted to ensure effective response. This document contains contingencies, including procedures for unanticipated events.

2.4 General Emergency Procedures

In any emergency, the following actions should be taken:

1. Notify emergency services (fire, ambulance, etc.) by calling 911.

2. Notify all personnel of the nature and location of the emergency. Evacuation instructions may be issued if indicated. Cellphones may be utilized to provide instructions and notifications as necessary.

3. Attempt to confirm the exact location, character, source, amount and extent of any released materials. Concurrently, estimate the potential hazards to health and/or the environment that may result from the incident.

4. **Notify Dan Santos, Rob Buck or any LPC Manager designated to act in that capacity**. Any LPC personnel identified on the next page may be considered a designated Emergency Coordinator depending upon the situation. The Emergency Coordinator will determine which if any regulatory agencies need to be contacted.

2.5 Emergency Coordinators

KENT		
Name	**Extension**	**Cell**
Dan Santos, Vice President Production / Emergency Coordinator	8038	(206) 718-7005
Rob Buck, *Director of EHS*	8087	(206) 714-3028
VANCOUVER		
Name	**Extension**	**Cell**
Vince Guymon, Vice President Vancouver / Emergency Coordinator	4401	(503) 522-9438
Ryan Cramer, General *Super.*	4408	(503) 964-0689

2.6 Hazardous Material Spill Procedures

The possibility still exists that a hazardous material spill may occur. Emergency procedures have been developed and taught to all persons who could potentially be involved or affected by a spill.

If a spill occurs:

1. Immediately notify the necessary personnel that a spill has occurred, including the designated Emergency Coordinator.

2. Clear the area of all persons except those necessary to contain or clean up the spill.

3. Determine the nature of the spill and consult the Safety Data Sheets (SDS) for information to determine the precautions needed and how to deal with the spill.

4. The Emergency Coordinator will notify authorities, if required.

5. Control and contain the spill if safe to do so. Stop sources of the spill and prevent it from spreading further. Close off drains, shut off heating, ventilation and air conditioning systems if necessary.

6. If required, construct a decontamination facility, making sure to leave enough room inside for cleanup of equipment. All workers entering the decontamination enclosure should wear necessary protective clothing and respirators.

7. Requirements for soil, water and/or air testing will be determined by the Emergency Coordinator.

8. Approved cleanup measures must be taken and proper disposal of waste shall be made.

9. Removal of enclosure and decontamination facilities should be done in accordance with recognized procedures and disposed of properly.

10. The Emergency Coordinator will notify personnel and required government agencies when cleanup is completed and a safe working environment has been restored.

2.7 Fire Procedures

The Fire Department should be notified in the event of any fire, no matter how large or small. All personnel in the vicinity should be made aware of any fires by voice warning, phones or other means.

Steps to follow in the event of fire:

1. **Discovery.** Upon discovering a fire:
    a. If necessary, sound the evacuation notification and alarms.
    b. Quickly help any person who is injured or in danger to get away from fire.
    c. Rescue personnel must avoid putting themselves in danger during any rescue.
    d. Everyone shall meet at a pre-designated gathering point outside, where roll shall be taken.

2. **Emergency Services.** The person who discovered the fire should proceed to the nearest safe phone and call 911. They should provide the following information:

    a. The location of the fire.
    b. Description of what on fire
    c. Their name, phone number and location from which they are calling.
    d. Stay on the phone until emergency services instruct you to hang up.

3. **Containment.**
    a. Attempt to contain the fire by closing all windows and doors and removing any flammable materials which may further fuel the fire.
    b. All non-emergency electrical equipment should be disconnected, if possible.

4. **Extinguishing the Fire.**
    a. If the fire is in its early stages or small enough, efforts should be made to extinguish the blaze with portable equipment.
    b. If the fire is large or immediately dangerous, evacuation the area let emergency services deal with the fire.

2.8 Disaster Procedures

In the event an unexpected disaster (eruptions, earthquake, flooding, severe storms, etc.) occurs, personnel shall seek a structurally sound building for shelter and contact emergency services.

2.9 News Media Relations

All statements to the media will be made only by the LPC President, **Bill Newcomb.**

The occurrence of a major disaster where LPC is involved may cause contact to be made by local news media. It is essential that all information given to media representatives be factual and accurate. Refer any member of the media to the president for an official response.

2.10 Emergency Notifications

The event of a major disaster such as fire, uncontrollable chemical spill, explosion, severe earthquake, or other occurrence with the potential to cause injury or be damaging to the facilities and/or adjacent area, requires the immediate notification of the proper emergency service. The proper emergency service is determined by the nature of the emergency. Disasters or other emergency incidents may require notification of multiple agencies. Notify emergency services (fire department, police and ambulance) by calling 911. Notification of regulatory agencies is the responsibility of the Emergency Coordinator, who should be contacted immediately in the event of any emergency.

Agency	Phone	Typical Reportable Emergency
Fire Department	911	Fire, Explosion, Personnel Injury
Ambulance	911	Personnel Injury
Emergency First Aid Care	911	Personnel Injury
Poison Control	(800) 222-1222	Personnel Injury
Police	911	Personnel Fatality, Civil Disturbance
Sheriff	911	Personnel Fatality, Civil Disturbance
National Response Center	(800) 424-8802	Chemical Spill
OSHA	(800) 321-6742	Personnel Fatalities (after hours)
WA State Dept. of L&I	(800) 423-7233	Personnel Fatalities
WA State Dept. of Ecology	(206) 594-0000	Chemical Spill
WA State Dept. of Ecology	(800) 645-7911	Chemical Spill into Surface Water
WA Sate Dept. of Transportation	911	Chemical Spill on Highway
Puget Sound Clean Air Agency	(206) 343-8800	Hazardous Material Release to Air
Oregon OSHA	(800) 922-2689	Personnel Fatalities
Oregon Dept. of Enviro. Quality	(800) 452-0311	Chemical Spill
Oregon Dept. of Transportation	(503) 823-7180	Chemical Spill on Highway

2.11 Facility Description

LPC is a commercial and industrial painting and decorating contracting company with facilities in Kent and Vancouver, Washington. Facilities include truck maintenance, less than 90-day hazardous waste storage, two (2) supply warehouse facilities, a decontamination room for cleaning tools used in hazardous materials abatement contracting work, and the Company's administrative and management offices. The company maintains and services fleet motor vehicles, heavy equipment, temporary stored materials and paints used in off-site commercial abrasive blasting and painting operations and provides administrative support services for operations. Property boundaries, frontage roads and on-site structures are depicted for both offices at the end of this document.

2.12 Emergency Equipment

Facilities have equipment available to use for emergency and spill response activities including:

1. Spill response materials: Absorbent pads, booms, loose absorbents, catch basin emergency plug covers, poly sheeting, caution tape, etc. (See table below for standard spill kit contents)
2. Trucks will have a standard truck spill kit.
3. Material handling equipment: Forklifts, drum dollies and hand trucks, empty drums, shovels, and brooms.
4. Personal Protective Equipment (PPE): Tyvek suits, boots, hoods, respirators including half-face, full face, and pressure demand supplied air full-face type, and eye wash station.
5. Cellular phones

	Gallons of Absorbtion	55 Gallon Drum	Total Gallons	15 Gallon Drum	Total Gallons
Pad, Absorbant	0.25	50	12.5	25	6.25
Socks, 3" x 4'	0.75	6	4.5	3	2.25
Bag, Absorbant material	6	2	12	1	6
Total Gallons			**29**		**14.5**
Gloves, Rubber	n/a	2	n/a	1	n/a
Dust pan	n/a	1	n/a	1	n/a
Broom	n/a	1	n/a	1	n/a
Bag, 6 mil 36" x 60" Clear	n/a	2	n/a	1	n/a

2.13 Spill Prevention, Control, and Countermeasure Plan (SPCC Plan)

SUMMARY APPROVAL AND CERTIFICATION

Name of Facilities: Long Painting Company

Type of Facilities: Offices and Service Center

Locations of Facilities: 21414 68th Avenue South, Kent, WA 98032 (Office)
21426 68th Avenue South, Kent, WA 98032 (Service Center)
1120 NE 146th Street, Vancouver, WA 98685

Designated persons responsible for hazardous material spill emergency coordination: Symantha Delacruz, Environmental Manager or Rob Buck, Director of Environmental, Health, and Safety (EHS).

Management Approval:

This plan is approved for implementation, including commitment of necessary resources for spill prevention.

Signature _____

Print Name: Rob Buck, Director of EHS

Date _____

Certification:

I hereby certify that I have examined the facilities and being familiar with the provisions of 40 CFR, Part 112 and WAC 173-303-340, -350 and -360, attest that this SPCC Plan has been prepared in accordance with good practices.

Signature _____

Print Name: Bill Newcomb, President

Date _____

3. PROCEDURES

3.1 RCRA Hazardous Waste

Pertains to hazardous waste as promulgated in law by the Resource Conservation and Recovery Act (RCRA) (40 CFR Parts 260-272).

Definitions

- **Generator**

  Means any person or company, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation. Note the definition is site specific. **There can only be one generator EPA ID # at a site and two sites cannot be covered with one generator EPA ID #**.

  Generator status is further classified according to the amount of hazardous waste generated:

  - Conditionally Exempt Small Quantity Generator (CESQG)

    This applies to sites that generate **less than 220 pounds per month** of hazardous waste. The **Conditionally Exempt Generator** is responsible only for following the handling requirements described in 40CFR (or in Washington WAC 173-303-070(8), or other state codes where applicable outside of Washington) in addition to any county or city hazardous waste management requirements. Hazardous waste generated at a Conditionally Exempt Generator site is not subject to regulations pertaining to transportation or manifesting of hazardous waste. Storage is limited to a **maximum accumulation of 2200 lbs.** of hazardous waste.

  - Small Quantity Generator (SQG)

    This is a site that generates between **220 and 2200 pounds per month** of hazardous waste The **Small Quantity Generator** is required to follow the SQG standards listed in 40CFR (or in Washington, WAC 173-303-201 and 173-303–202, or other state codes where applicable outside of Washington). Hazardous waste generated at a Small Quantity Generator site is fully subject to regulations pertaining to transportation and manifesting of hazardous waste. Storage of hazardous waste is limited to **less than 180 days** at this site.

  - Large Quantity Generator (LQG)

    This is a site that generates **equal to or greater than 2200 pounds per month** of hazardous waste. The **Large Quantity Generator** is subject to full regulation under the requirements of 40CFR (in Washington, WAC 173-303, or other state codes where applicable outside of Washington). Hazardous waste generated at a Large Quantity Generator site is fully subject to regulations pertaining to transportation and manifesting of hazardous waste. Storage of hazardous waste is limited to **less than 90 days** at this site.

    Long Painting is considered a Large Quantity Generator.

- **Hazardous Waste Manifest**

  This is a shipping and tracking document for hazardous waste. These are uniform nationwide and list the generator name, EPA ID #, and the waste that is being shipped.

- **EPA Empty**

  Refers to when an empty hazardous material container is able to be disposed as non-hazardous waste. **For most materials, an empty container has less than 3% of its original contents remaining**.

  This definition does not apply to containers of "Extremely Hazardous Waste".

3.2 Characteristics of Hazardous Waste

A material, which is no longer usable for its intended purpose, or is used in a manner which requires disposal is a hazardous waste if it is any of the following (per lists and limits established in federal, state and local regulations):

- Listed hazardous waste
- Corrosive
- Toxic
- Reactive
- Ignitable

3.3 Designation of Hazardous Waste

LPC is responsible for knowing what and how much hazardous waste is generated at our jobsites and facilities. This guide helps determine whether a hazardous waste is subject to special handling requirements when generated. This process of classifying wastes is called designation.

3.4 What You Need To Know To Start

Identify all waste-streams and processes that will produce waste. Understand how much hazardous waste is generated each month at the jobsite, and how much of each waste is accumulated onsite. This includes all parties that work at the site whether the work involves LPC or not. Understand the physical and chemical nature of the wastes. Product data sheets, Safety Data Sheets, sample testing and analysis reports are sources for information about the physical and chemical properties of the waste. Either set of data sheets should show the names of the chemicals used in a product.

Step 1: Inventory the Wastes

Find out what wastes there are, and how much waste will be generated during each month and accumulated onsite at any one time before disposal.

Step 2: Designating

All waste must be properly designated whether it is hazardous or not. The simple diagram in the appendix may be used to help with the designation. For more information see the EPA website.

Note: All wastes that are assigned waste numbers are hazardous waste.

Step 3: Generator Status

After tracing each waste through the flow chart, go back to the Generator Status Worksheet and follow the instructions. Add up all the pounds of wastes that have been assigned waste numbers. You can now determine if the jobsite is an exempt, small or large quantity generator, and what you must do to correctly handle the hazardous waste generated on the site.

3.5 Training for Hazardous Waste Operations

- **Roles and Responsibilities**

  The Environmental Manager shall be responsible to ensure all hazardous waste operations and environmental concerns are being managed in accordance with all applicable federal, state and local regulations. They will also ensure all personnel involved in these activities has received required training in the handling and disposal of hazardous waste, and emergency procedures.

Environmental Manager	Rob Buck
Service Center Manager	Symantha Delacruz
Hazardous Waste Technician (Kent)	Chandra Morrison
Hazardous Waste Technician (Van)	Tony Moss

- **Training Requirements**

  Initial 40-Hour Hazwoper Training is required for all Hazardous Waste Technicians, the Environmental Manager, the Director of EHS and Emergency Coordinators. After receiving their 40-hour training, they shall complete a yearly 8-hour refresher course.

  In addition, all LPC field employees will undergo annual Chemical Hazard Communication Training.

  All hazardous waste activities at LPC facilities are to be primarily handled by LPC personnel. Trained personnel from the approved hazardous waste transporters will also be able to perform hazardous waste activities at LPC facilities.

  Anytime unusual hazardous waste is handled, it shall be the responsibility of the Environmental Manager and the person in direct charge of the hazardous waste operation to see if additional training is needed. This shall include hazard recognition, specific emergency planning and training to ensure the safety of the wastes being handled.

  The Environmental Manager will make sure training documentation for personnel involved with hazardous waste is current and available. All training documents and certificates are kept on file. These files are reviewed annually to ensure all employees are current in their training. In addition, all new employee initial training documents are kept on file.

3.6 Hazardous Waste Handling Procedures

- **Overview**

  A hazardous waste generator is the company (or person), by site whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation. The generator also maintains the long-term liability for the waste ("cradle to grave").

- **Determining the Generator**

  The generator in most cases will be LPC customers since the work we are doing will be on their site and under their direction.

  Some customers handle all aspects of hazardous waste testing and disposal. In these cases, our subcontract responsibility for hazardous waste at the jobsite is complete when the wastes are properly containerized, sealed, labeled, and stored on the jobsite.

  When LPC is responsible for disposal of hazardous waste, these procedures are to be followed to designate the waste to be hazardous or to determine the waste to be non-hazardous. This could include paint, solvent, water, lead and blasting material. In all cases, the disposal plan we recommend must be approved by the generator.

  LPCs involvement with jobsite hazardous waste will be under the control of the Project Manager, in consultation with the Environmental Manager, who will be responsible for jobsite compliance with company environmental policies and procedures as well as for compliance with federal, state, and local environmental regulations.

3.7 Sampling and Testing For Hazardous Waste

The waste sample that we obtain from the jobsite must be representative of the whole waste.

- **Isolate Waste Streams**

  Often there are multiple areas or jobs on the same site which would cause the hazardous characteristics of the waste from each job segment to differ. The waste streams from each area or job must be kept separate and sampled individually.

  If the wastes were to be combined the hazardous characteristic of the waste from one area or job could cause other non-hazardous wastes from other areas to be contaminated and increase the amount of hazardous waste to be disposed of.

  Only after separate waste streams prove to be non-hazardous can they be combined, although it is not recommended.

  Never mix hazardous wastes that have different hazardous characteristics, such as solvents (flammable) and spent lead (toxic) contaminated abrasives. Mixing corrosives or reactive chemicals with other chemicals can cause a dangerous reaction, fire, or explosion.

- **Sample Each Waste Stream**

- Waste Testing Protocol Outline for Jobsite Work

    - (see following Test Protocol Reference Matrix)

  The following types of waste shall be separated, sampled and tested for proper disposal from the jobsite:

    - Blast abrasive of any type
    - Dust Collector Fines
    - Dust Collector Filters
    - Mechanical Surface Prep Debris
    - Waste or contaminated Water
    - Degreasing Solution
    - Chemical Stripper and Residue
    - Protective Clothing for hazardous materials
    - Used PPE for hazardous materials
    - Containment Materials

  Take a sample in a manner so the sample is representative of the whole waste stream:

  1. Take as many incremental samples as is feasible from equal lots. For example: for spent abrasive in drums, take at random an approximate two pound incremental sample from each of 20% of the drums at random. (If there are less than ten drums, take a sample from each of 3 drums selected at random.)

  2. Combine the incremental samples in a clean, non-metallic container and mix thoroughly.

  3. Take a one-quart sample from the combined increments. Use a clean plastic sample jar (available from the Service Center). The gross sample will represent the entire waste stream. **Each sample must be at least 200 grams of material (about 2/3 pounds).**

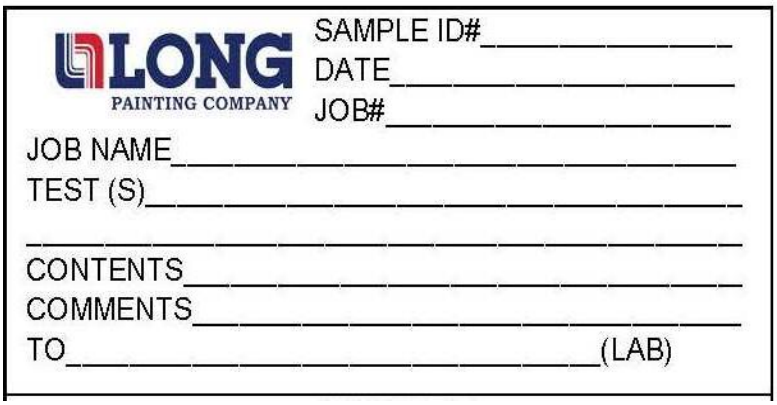
      - Put another minimum 200 grams or 2/3 lb. in a second clean sample jar and retain this sample at your jobsite. Label it as your RETAINED DUPLICATE SAMPLE. Keep this sample until you are directed to dispose of it.

  4. Return the remaining combined incremental samples to an original waste container or pile.

  5. Label the sample as follows (see sample label below):

      - Sample ID number (obtain ID # from the Service Center)
      - Date
      - Job number
      - Job name
      - Testing requested
      - Description of material being sampled (contents)

- To (indicate the lab where sample is being sent)



6. Fill out a Chain of Custody Form #654 or #654A (See section below for information on how to do this).

7. Apply the Waste Pending Analysis label to all the waste containers.

8. If there are unusual job conditions, alternate sampling methods can be used. Call the Environmental Manager for details.

- **Chain of Custody Form**

1. All waste samples require #654 Chain of Custody Form to accompany the sample being sent to the lab. There is a separate form for Kent (#654) and Vancouver (#654A). (Note: In many cases the chain of custody form is filled out online for the vendor taking the materials and a paper form will not be used)

   The information to be filled in is as follows:

   - Job name.
   - Job number.
   - Date of sampling.
   - Name of the employee who took the sample.
   - Purchase order number for waste analysis cost.
   - Contact person to notify with the testing results.
   - Generator sample ID #, (optional) may be entered for customers use (or for LPC facility site use).
   - LPC sample ID number for each waste sample. This number is to be obtained from the Service Center.
   - Description of the waste and process, which generated the waste.
   - Test(s) to be done for each waste sample.
   - Other: Indicate other factors such as a “Rush” request.
   - Signature line filled in for each person who handled the waste samples. Copies are to be sent to the Project Manager for filing in the job file. The Service Center will retain one copy of each Chain of Custody.

2. Forward waste samples with the Chain of Custody to an approved lab. Samples may be delivered to the Service Center to be forwarded to the lab or may be taken directly to the lab by field personnel. Be sure that a purchase order has been issued and entered.

3. Have that person receiving the materials from you sign and date the Chain of Custody Form.

    a) After that person has signed the Chain of Custody make a copy of the form to keep at the jobsite.

    b) Each person that handles the materials will sign the Chain of Custody and keep a copy of it.

    c) The Chain of Custody form goes to the laboratory with the sample to be tested. It remains with the sample and is to be returned to the LPC Environmental Manager for LPC permanent records

If you are using a copper slag abrasive that has been pretreated with “Blastox” or “Pre-Tox”, or the substrate has been pretreated with “Pre-Tox”, the test request is to include both a TCLP analysis and a total lead analysis. Write this on the sample label and on the Chain of Custody under Tests Requested.

- **Test Results**

1. Results of lab analysis will be sent to the Environmental Manager or designated assistant who will then analyze the results to determine designation of the waste as hazardous or non-hazardous. The test report will be sent to the designated Project Manager Team member marked as hazardous or non-hazardous waste.

2. The hazardous waste disposal plan will be determined by the Project Management Team and recommended to the generator.

3. The generator has the final say regarding the recommendation for disposal. Please note that only the generator or his authorized representative is allowed to sign the hazardous waste manifest. **LPC field employees are not authorized to sign hazardous waste manifests.**

3.8 Test Protocol Reference Matrix

Waste Testing Protocol for Job Foreman

Test Protocol Reference Table 1

What	Where	When	How Much	How	Combine	Final Sample Amount	What You Do With It	Special Conditions
Waste Abrasive	From 1 Defined Area	Minimum 1 Shift Completed	2 lb. or 1 Qt. Minimum	1-10 containers 2 lb each 11+ containers / 1 on 5 @ 2lb ea	Combine all random samples and then take 2 lb sample	200 grams or 2/3 lbs	For every sample do the same thing	Superintended will give written instructions for special conditions
Dust Collector Fines	From 1 Defined Area	Minimum 1 Shift Completed	2 lb. or 1 Qt. Minimum	Sample all containers @ 2 lb ea.	Combine all samples	200 grams or 2/3 lbs		
Dust Collector Filters	From 1 Dust Collector	End of use, before Demob	2 lb. or 1 Qt. Minimum	Destroy only 1 filter	Combine all samples	200 grams or 2/3 lbs	1. Put into sample jar	
Debris from Mechanical Prep	From 1 Defined Area	Minimum 1 Shift Completed	2 lb. or Max Available	Sample all containers @ 2 lb ea.	Combine all samples	200 grams or 2/3 lbs	2. Get sample id number	
Water	1 Defined Surface/Area	Minimum 1 Shift Completed	2 lb. or 1 Qt. Minimum	Sample all containers @ 2 lb ea.	Combine all samples	200 grams or 2/3 lbs	3. Label the sample jar	
Degreasing Solution	From 1 Defined Area	Minimum 1 Shift Completed	2 lb. or 1 Qt. Minimum	Sample all containers @ 2 lb ea.	Combine all samples	200 grams or 2/3 lbs	4. Fill out Chain of Custody	
Chemical Stripper w/ Paint	From 1 Defined Area	Minimum 1 Shift Completed	2 lb. or 1 Qt. Minimum	Sample all containers @ 2 lb ea.	Combine all samples	200 grams or 2/3 lbs	5. Send to warehouse	
Protective Clothing (PPE)	Representative Crew	All crew members, 1 shift	2 lb. / 1 Qt. Min 2 suits	5 suits or max available	Combine all samples	200 grams or 2/3 lbs		
Containment Materials (Visqueen, Shrinkwrap, Tape)	From 1 Defined Area Containment	At the end of teardown	2 lb. or 1 Qt. of each	Sample all sides / surfaces	Combine, then take 2 lbs	200 grams or 2/3 lbs		Do wipe sample first and test.

Test Protocol Reference Table 2

Sampling	Test Request for EPA	Test Request for State of Washington	First Labeling	Job Log Entry	Waste Storage	Final Labeling	Final Paperwork
Sample each stored waste stream and send for lab analysis and determination per Table 1 above	Request TCLIP for 8 D-Listed metals. If waste is copper slag with a pretreatment (Blastox or similar) Request Total Lead test in addition to TCLP	Request TCLIP for 8 D-Listed metals along with Cu, NI and Zn. If waste is copper slag with a pretreatment (Blastox or similar) Request Total Lead test in addition to TCLP	Label each container with a "WASTE PENDING ANALYSIS" label with the sample ID number and sampling date.	Enter in your job log each waste being sampled and tested: 1. Date Accumulated 2. Date the samples were sent for analysis 3. Testing facility name	1. Storage must be secure. 2. Protect from rain and groundwater. 3. Each container is covered. 4. Each container is labeled. 5. Segregate different waste types	After each waste is designate by analysis: 1. Remove previous labels 2. Fill out and attach "HAZARDOUS WASTE" label to container OR 3. Fill out and attach "NON-HAZARDOUS WASTE" label	Turn in all jobsite Chain of Custody form and job log entries to your supervisor

3.9 Chain of Custody Form #654 (#654A for Vancouver Office)

LONG PAINTING COMPANY

CHAIN OF CUSTODY
REQUEST FOR LABORATORY ANALYSIS

Long Painting Company
21414 - 68th Avenue South
Kent, WA 98032
www.longpainting.com
Phone: (253) 234-8050
Fax: (253) 234-0034

Generator EPA ID #: _____ Job Name: _____ Job #: _____
Generator Name: _____ Date of Sample: _____ PO#: _____
Generator Contact: _____ Sampler: _____
Generator Phone: _____ LPC Contact: _____

Generator Sample ID	LPC Sample ID	Process Generating Waste	# of Samples Each	Confirming Analysis Only Information Attached	D-Listed Metals by TCLP D004-D011	Other (please specify)

	Signature	Printed Name	Company Name	Date/Time	Special Instructions/Comments
Relinquished By:					
Received By:					
Relinquished By:					
Received By:					
Relinquished By:					
Received By:					
Relinquished By:					
Received By:					

Created: 7/30/2019 Form 654 KENT 1

3.10 TSDs, Disposal Plans

The Project Management Team is responsible for writing a Waste Disposal Plan for all Hazardous Waste generated on the job site. The Plan includes scheduling, profiling and transportation of the waste to a permitted and approved Treatment, Storage, and Disposal facility (TSD) for disposal.

All hazardous waste generated at LPC facilities will be transported by and to a TSD facility approved by the company's Environmental Manager.

3.11 Disposal Profiling for Hazardous Waste

A profile of the waste is required before a Treatment, Storage, and Disposal (TSD) facility is able to accept the waste for disposal. A profile is a description of the wastes and its individual characteristics. (Some profiles are already established for many hazardous waste streams. See the Environmental Manager to find out if a profile already exists that matches the waste.) The new profile is written by the TSD facility based on a representative sample being submitted to verify testing lab analysis. The method of disposal and required treatment or stabilization is determined from this procedure.

1. Obtain another representative sample in the same manner as the test sample was obtained including a new sample ID #. Label and prepare a Chain of Custody for the sample. Show the name of the TSD facility as the final destination.

2. The TSD facility will not perform the designation testing as this must be accomplished through an independent lab.

3. Profiling can take from 1-2 weeks to complete. Communicate to the TSD to shorten this time, if necessary.

4. The completed profile must be signed by the generator and returned to the TSD.

5. Scheduling for pickup by the TSD will be arranged between the TSD and the Project Management Team. It will be absolutely necessary for the generator to be present when the waste is picked up. The hazardous waste manifest must be signed by the generator. **LPC personnel do not sign as the generator on any hazardous waste manifest for field jobsites**.

6. A copy of the manifest is to be kept by the Project Management Team and copies forwarded to the Environmental Manager and to the job file. Original manifest documents must be sent to the generator.

3.12 Labeling of Drums, Containers

Drums and containers are to be clearly marked with the appropriate labels. Before placing any labels on the container, remove any existing labels to prevent confusion as to the actual contents of the container. **Labels must be placed on containers prior to filling the containers.**

- **Waste Pending Analysis Label**

Use the Waste Pending Analysis label to identify waste while the sample is being analyzed. Sampling of waste should be done within 24 hours of accumulating a drum or other container of any potentially hazardous waste.

Sampling of waste should also occur within 24 hours of discovering a mystery drum or other container of unknown waste material. Apply the Waste Pending Analysis label(s) to accumulation containers at the time of sampling. Fill in the label with as much information as is known. **At a minimum, the sample ID number and the date of sampling must be filled in.**

Additionally, the job logbook must have the following information recorded:

- Date of first accumulation (or discovery)
- Date when samples were sent for testing
- Testing facility name

Containers with the Waste Pending Analysis label must be kept secure as if the waste is known to be hazardous. If the site has a hazardous waste accumulation area, the waste should be moved to that area if possible.

When the lab results become known, the Waste Pending Analysis labels are to be removed and containers are to be relabeled with either the Non-Hazardous Waste label or the Hazardous Waste label with the appropriate hazard label.

- **Hazardous Waste Label**

  If the waste is designated as hazardous waste you will need to complete the hazardous waste label with the following information:

  1. Generator name.
  2. Generator side ID#.
  3. Proper name of waste.
  4. Accumulation start date. This is to be the date of the lab report, or the date the container was filled, whichever is later.

- **Secondary Hazard Warning Label**
  Hazardous waste containers are required to carry a secondary label showing the primary hazardous characteristic of the waste.

- **Non-Hazardous Waste Label**
  Wastes determined to be non-hazardous are to be labeled with the non-hazardous waste label. Clearly mark the job name and number, date, description of waste, and sample ID# on the label.

3.13 Storage of Hazardous and Non-Hazardous Waste

- **Hazardous Waste Accumulation Areas**

  The hazardous waste accumulation area is for the collection and temporary storage of paint, used solvents and other potentially hazardous waste. All paint waste, used solvents and waste that will be recycled or disposed of are to be collected in this area. Once there it will be determined by the Project Management Team or Hazardous

Waste Technician what is to be recycled or disposed of. Storage of hazardous waste is limited to 90 days.

Hazardous waste is to be stored in labeled, closed and sealed containers in a Hazardous Waste Accumulation Area. This area is to be secured from the public and requires containers of liquid hazardous waste to be placed in secondary containment within the area.

- **Inspections**

  The hazardous waste accumulation area is inspected by the Project Management Team or Hazardous Waste Technician weekly for compliance with federal, state and local environmental regulations. Inspection logs are filed in the office of the Environmental Manager. Job site hazardous materials storage will be inspected by the job site foreman. Job site inspection logs are filed in the job file. If issues are found, they must be immediately corrected.

- **Storage Time Limit**

  The hazardous waste storage time limit begins on the accumulation start date. Storage time limit is dependent upon the site status:
  - CESQG (Conditionally Exempt Small Quantity Generator) (no time limit)
  - SQG (Small Quantity Generator) (180 days)
  - MQG (Medium Quantity Generator) (180 days)
  - LQG (Large Quantity Generator) (90 days).

- **Configuration of Storage**

  All drums containing hazardous or non-hazardous products or wastes should be stored in double rows separated by an aisle way of 30 inches between each double row of drums.

- **Required storage for hazardous wastes**

  All drums and containers that have hazardous waste are to have the labels facing the aisle to help with identification.

3.14 Hazardous Waste Manifests

Hazardous waste manifests are the documents required to accompany and track shipments of hazardous waste. A signed hazardous waste manifest may commit the company to long-term liability for disposed waste. **A hazardous waste manifest is not to be signed by anyone in the company other than the Environmental Manager or their designated representative.**

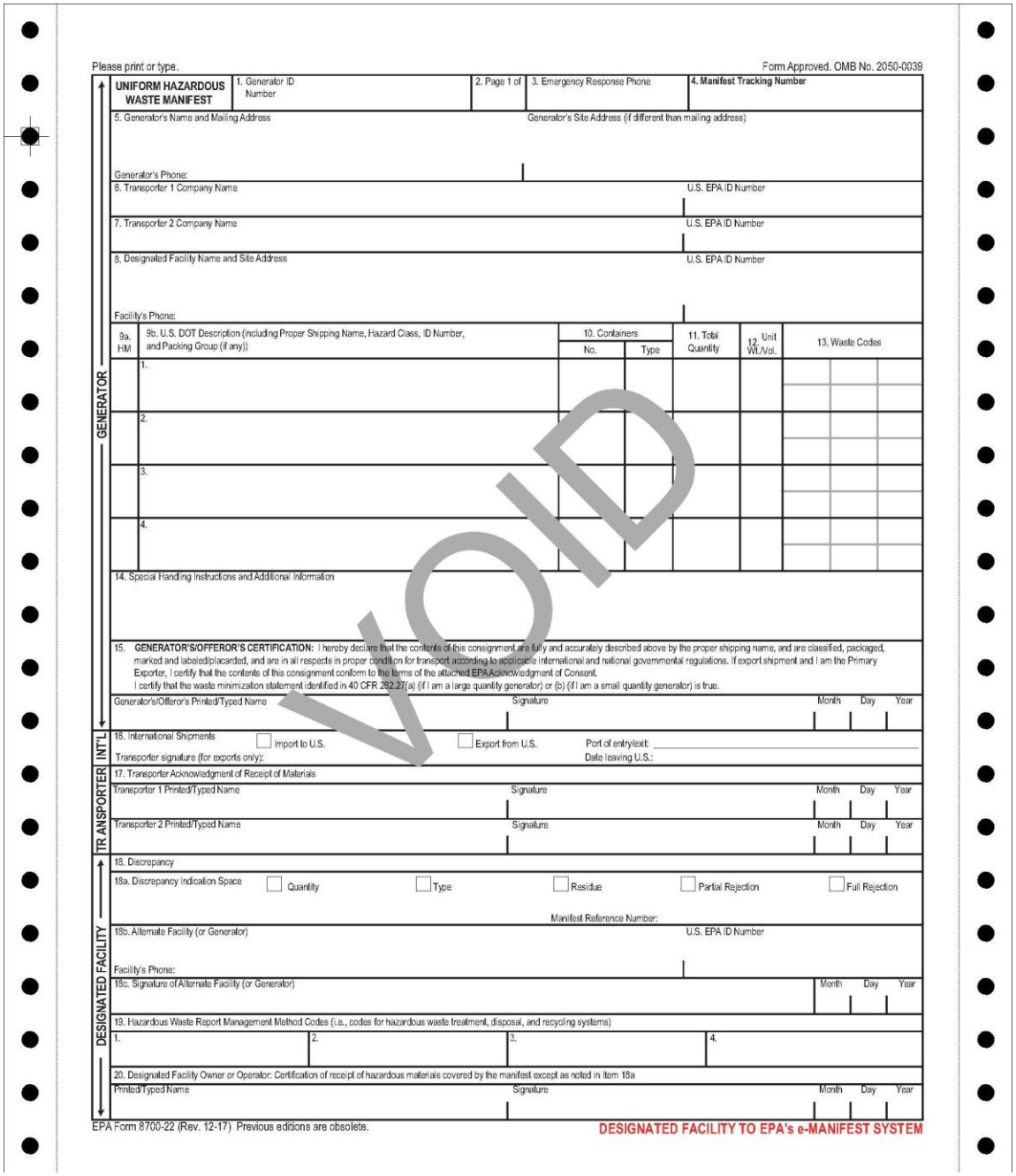
A manifest will need to be signed by an authorized LPC employee only for wastes that are generated at LPC facilities. Hazardous wastes generated at field jobsites will require the generator to sign as the hazardous waste generator. There are no exceptions to this rule.

A copy of the manifest is to be obtained by the Project Management Team and copies forwarded to the job file. Original manifest documents must be sent to the generator.

3.15 Instructions

1. Fill out the Manifest completely.
2. The generator number should be the site that the hazardous materials were collected from.
3. Many manifests are now done online through the approved hazardous waste collections company.

3.16 Manifest



Please print or type. Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number | 2. Page 1 of | 3. Emergency Response Phone | **4. Manifest Tracking Number**

5. Generator's Name and Mailing Address — Generator's Site Address (if different than mailing address)

Generator's Phone:

6. Transporter 1 Company Name — U.S. EPA ID Number

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number

Facility's Phone:

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1.					
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name — Signature — Month Day Year

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name — Signature — Month Day Year

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1. | 2. | 3. | 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name — Signature — Month Day Year

VOID

EPA Form 8700-22 (Rev. 12-17) Previous editions are obsolete. DESIGNATED FACILITY TO EPA's e-MANIFEST SYSTEM

3.17 Transportation of Hazardous Waste

Designated hazardous waste may only be transported from Medium and Large Quantity Generator sites to a TSD facility by licensed hazardous waste transporters. The LPC Service Center site is not a TSD facility and LPC is not a licensed hazardous waste transporter.

- **The company cannot transport non-recyclable hazardous waste from regulated jobsites.**
- **The Service Center cannot accept hazardous wastes from regulated jobsites**.

Small quantities of hazardous wastes from conditionally exempt generator sites (generation of less than 220 pounds/month) are exempt from this rule. Small quantities of properly packaged and labeled hazardous waste may be transported in company vehicles from exempt sites to the Service Center provided prior approval is obtained from the Environmental Manager.

- **Approval for waste acceptance at the Service Center is contingent upon having an established waste profile for the waste**.

3.18 Transportation of Non-Hazardous Waste

Properly tested and labeled non-hazardous waste may be transported in company vehicles from jobsites to disposal sites or to the Service Center for disposal**.** Non-hazardous waste must remain at the job site until it is approved as an acceptable waste stream to store at the Service Center for disposal, or approved for disposal at a landfill or recycle facility.

Prior approval of the waste and disposal plan is required for acceptance of the waste at the Service Center.

3.19 Waste Minimization

This procedure is intended to ensure proper job site materials management in order to minimize generation of waste and hazardous waste, and to keep our facilities and jobsites in compliance with all federal, state and local regulations.

1. The Project Manager is responsible for proper materials management.
2. Jobs are to be managed with the goal of minimizing unused and waste products to be disposed of.
3. Order 75% of paint products for initial use. Then calculate and order the amount needed to finish the project just before the initial supply will run out.
4. Unused water-based paint with be recycled through the Paint Care program in Washington and Oregon states.

LPC will not warehouse unused paints for unspecified future use. Service Center facilities hazardous material limits may not be exceeded.

3.20 TSCA Hazardous Waste: Asbestos, PCBs

Some hazardous waste such as PCB's and asbestos wastes are not regulated by the Resource Conservation and Recovery Act (RCRA) They are instead regulated by the Toxic Substances Control Act (TSCA).

LPC does not do work with asbestos materials or waste.

Waste paint that contains PCBs that do not leach will be handled as hazardous waste following our normal hazardous waste procedures. Any fluids containing PCBs will not be handled or disposed of by Long Painting.

3.21 Air Emissions

Solvent (VOC) Handling Procedures

1. All containers of Volatile Organic Compound (VOC) materials must be kept closed to prevent evaporation. **Containers of VOC materials may be open only when using the contents or filling the container.** Cover all containers and work-pots at the end of each shift, during lunch and rest breaks.

2. Cleaning solvents used to clean paint application equipment must be sprayed into a sealable container.

3. Emissions of VOC materials to the environment will be reduced by proper selection of paint spray application equipment. Use of high transfer efficiency spray guns and methods may result in less material consumption, lowering emissions of VOC chemicals into the air.

Lead Work Containment

See Lead Work in the LPC Safety Program and Form 954

Containment of Dust Particulate

Containment and/or control of emissions of dust and particulate materials are required. The job plan will include methods of controlling paint overspray and fugitive dust emissions to the atmosphere. Various methods of control include containment, dust collection equipment, wet methods, tools with vacuum shrouds, and electrostatic application.

The Project Management Team will include in the job plan the appropriate methods and equipment to minimize fugitive dust and comply with federal, state and local regulations.

3.22 Stormwater Protection, Wastewater Discharge

Any discharge to the public drainage system (or storm sewer system) of anything but storm water is not allowed. Any job site with activities near storm water drains or where general drainage flows into the public drainage system will require precautions and methods to preventing contaminants from entering the storm sewer system. This may include dikes, containment around the materials and / or blocking or sealing the drains.

Activities include but are not limited to sandblasting, power washing, equipment fueling, painting and hazardous materials abatement. The Project Management Team is responsible for including in the job plan methods, materials and equipment needed to protect the storm sewer system from contaminants due to Long Painting Company activities on the job site.

Latex Wash Water Disposal

Water used to clean up latex paint tools and equipment is generally a non-hazardous waste. This wash water does not require waste testing; however the containers do require labeling as non-hazardous waste per section 3.10 above. Send the wastewater back to the service center for disposal.

Latex wash water may not be disposed in the storm sewer system or through any drain having an untreated outlet to a ditch, creek, lake, river or other public waterway. DO NOT DUMP!

3.23 Power Washing Wastewater Disposal

Power washing of buildings or equipment can dislodge contaminants and carry them into the storm sewer system.

Power Washing Buildings

1. Allow non-hazardous wastewater to infiltrate into the ground in a pervious or vegetated area.

2. Block off yard drains, catch basins, roof drains etc. that could carry wastewater and contaminants into the storm sewer system.

3. Collect chips of paint/debris with filter fabric.

4. If a pervious area is not available to receive wash water, flow must be directed or pumped to a sanitary sewer system or be collected and transported to a disposal site.

5. Power washing wastewater may be allowed into the storm sewer system if no soap or chemical is used and:

    - Filter fabric is installed to collect all chips of paint and debris, and
    - An approved catch basin insert is installed in any catch basin that could receive water from the washing operation. The inserts must be regularly inspected and maintained during washing operations.

Truck and Equipment Washing

Washing of company trucks and equipment is prohibited outdoors at company facilities unless wastewater flows to sanitary sewer. Use a commercial vehicle wash facility or the indoor truck wash facility at the Kent Service Center. Job site equipment washing/flushing will follow the power washing procedure.

3.24 Portable Showers Wastewater Disposal

Wastewater from personnel shower and hand washing facilities at jobsites are to be collected, sampled and tested prior to disposal. **Non-hazardous shower and hand wash wastewater may be discharged to a sanitary sewer only.**

3.25 Standard Acceptable Wastes from Jobsites (profiles not required)

General Trash / Garbage (to dumpster)

- Food waste/trash

- Hardened/solidified latex paint/sludge

Recycling (to recycling dumpster)
- Dried used paint applicator tools, roller covers, stir sticks, etc.
- Used (empty) paint buckets, cans, workpots
- Used masking materials/poly sheeting
- Non-hazardous debris
- Non-toxic contaminated PPE (Tyveks, etc.)
- Painted, or bare scrap metal
- Non-refrigerant containing scrap appliances

Universal Waste (for recycling)
- Fluorescent, metal halide, mercury vapor light tubes/bulbs
- Waste oil/grease

Latex Paints, Non-Hazardous

Flammable Paint/Solvents, From Conditionally Exempt Generator Site (<220 lbs generated per year)
- Spent solvent/sludge
- Cured epoxy sludge
- Waste paint
- Waste solvent soaked rags, staining rags

Flammable Paint/Solvents, From Regulated Generator Site (>220 generated per year)
- Recyclable spent solvents
- Leftover, usable, recyclable paint

Wastewaters
- Tested Non-hazardous power washing wastewater
- Tested Non-hazardous latex paint cleanup/wash wastewater
- Tested Non-hazardous shower/handwashing wastewater

Spent Abrasives
- Tested Non-hazardous dust from dust collector
- Tested Non-hazardous spent copper slag, glass, green diamond, mineral abrasives

Spent Abrasives (recyclable)
- Steel grit/shot recyclable abrasives (metals total testing required)

Asbestos (for landfill)
- Do not accept asbestos

3.26 Outdoor Storage of Materials

Protect containers of materials from rainwater if possible. When containers are stored in open areas, place the covered containers so that rainwater may not get into the containers. Protect downstream catch basins from contaminant intrusion.

Clean up spent abrasives often. Protect piles of exposed loose materials like spent abrasives with plastic sheeting held down with sandbags, tires, or other anchors.

3.27 Mobile Operation/Fueling of Equipment

Protect storm water from petroleum contaminants during operation and fueling of equipment at jobsites:

1. A LPC competent person shall be present at all times during fueling operations.
2. Place a minimum 5-gallon capacity drip pan with an absorbent pad in it beneath the fueling location prior to and during dispensing operations.
3. Do not overfill. Leave an appropriate headspace for expansion or for out of level operation of the vehicle or equipment.
4. Maintain fueling pumps, hoses, and nozzles in good working order.
5. Place a secondary containment under all equipment that operates on or contains fuels, hydraulic fluid and other liquids. Long Painting has two standard sizes of spill kits, a 29 and a 14.5 gallon capacity.
    a) Have a spill clean-up materials adjacent to equipment that uses fuel: Absorbents capable of absorbing minimum of 14.5 gallons of fuel**.**
    b) A storm drain cover/plug kit.
    c) A minimum 10-foot containment boom.
6. Park equipment on jobsites inside a spill containment berm.

4. CONTAINER LABELING

4.1 Container Labeling Protocol

- Remove labels from previous use if not the same material.
- Apply correct labels prior to filling container.
- Use permanent marker pen to write labels.
- Place labels so they are clearly visible.

4.2 Label Examples

Material Matches Original Labeling From Manufacturer *No Relabeling Required*

Material Contains a VOC or is Flammable

Label With Description of the Materials

Material is Corrosive

Label With Description of the Materials

Material Has Other Hazardous Charateristics

Label With Description of the Materials

Material is Designated Hazardous Waste

Choose From Label Above

Material is Non-Hazardous Waste

Material is Non-Regulated Hazardous Waste

Material is Being Tested to Determine the Type of Waste

5. HAZARDOUS WASTE ACCUMULATION AREAS

5.1 Facility Inspection Form (Form 650)

LONG PAINTING COMPANY

Weekly Inspection Checklist for Central Accumulation Areas

- Answer "yes" or "no" for each question, every week.[1]

	Date	Time	Inspector's printed name	Signature
Week 1:				
Week 2:				
Week 3:				
Week 4:				
Week 5:				

Questions	Week 1		Week 2		Week 3		Week 4		Week 5	
1. Is the accumulation area free of leaks and spills?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
2. Are all containers in good condition (no severe corroding, rusting, flaking, scaling, or structural defects)?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
3. Is the secondary containment system free from deterioration (such as cracks, gaps, or corrosion)?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
4. Are all containers marked or labeled as "hazardous waste," "dangerous waste," or "waste pending analysis?"	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
5. Are all containers marked with the hazards associated with the waste (ignitable, reactive, corrosive, and toxic)?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
6. Are all containers (excluding satellite accumulation containers) marked with the accumulation start date?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
7. Are all containers within the large quantity generator 90-day or medium quantity generator 180-day timeframe?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
8. Are all container labels visible and readable?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
9. Are all containers closed?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
10. Are there 30 inches of aisle space between rows of containers?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
11. Are rows of containers at most two containers wide and allow for unobstructed inspection of each container?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
12. Is secondary containment clean and free of debris, contamination, spills, leaks, and standing water?	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

Actions Taken: If you responded "no" to any of the questions, describe on the back how you fixed the problem and include the date you took action to solve it.

Created 2-2023 Rev. 9-23 Form 650 Page 1 of 1

5.2 Kent Facility

A. Room H2: Small Hazardous Storage Room, SE Corner of Kent Service Center-Use, Mixing, Dispensing Rules

1. All containers properly labeled.
2. All containers of flammable materials properly closed and sealed unless adding to or subtracting from the contents.
3. Rollup door to storage room H3 to be fully closed prior to opening any containers of flammable materials.
4. Pumping operations to be attended at all times.
5. Fire doors to be allowed to close freely unless moving a load in or out of the room. Exception: The door to the outside may remain open while the room is occupied to allow better air ventilation. Close this door when leaving to maintain security.
6. Maintain 30” inch aisles and free access to escape doors.
7. Do not exceed 1 drum quantity of any product or waste stream in this room at one time.
8. Use grounding straps on all containers/pumps during transfer of any flammable materials. Make contact between cans, nozzles and containers while pouring or pumping flammable materials.
9. Explosion proof tools only. No electric devices, radios, extension cords etc. allowed inside this room unless explosion proof rated.

B. Room H3: Large Hazardous Storage Room, SE Corner of Kent Service Center - Flammable Storage Rules

1. All containers properly labeled.
2. All containers of flammable materials and hazardous waste properly closed and sealed at all times. **Do not open containers of flammable materials in this room.**
3. Fire doors to be allowed to close freely unless moving a load in or out of the room. Exception: The rollup door to the outside dock may remain open while the room is occupied. **Close this door when leaving to maintain security**.
4. Maintain 30” inch aisles and free access to escape doors.
5. Explosion proof tools only. No electric devices, radios, extension cords etc. allowed inside this room unless explosion proof rated.
6. Do not leave hazardous materials on the outside dock, move them inside for storage.
7. Use secondary containment pallets for storage of all “hazardous waste” containers inside this room unless explosion proof rated.

C. Hazardous Materials Loading Dock Rules, Outside Room H3

1. All containers properly labeled.
2. All containers of flammable materials and hazardous waste properly closed and sealed at all times. Do not open containers of flammable materials on the dock.
3. Keep the dock clear. Not a material storage area.
4. Do not leave hazardous materials on the outside dock, move them inside for storage. See Service Center personnel to be sure hazardous materials are moved into the H3 storage room immediately.
5. Use secondary containment pallets for temporary placement of all hazardous material and “hazardous waste” cans and buckets.
6. Non-hazardous general waste in the garbage receptacle only.

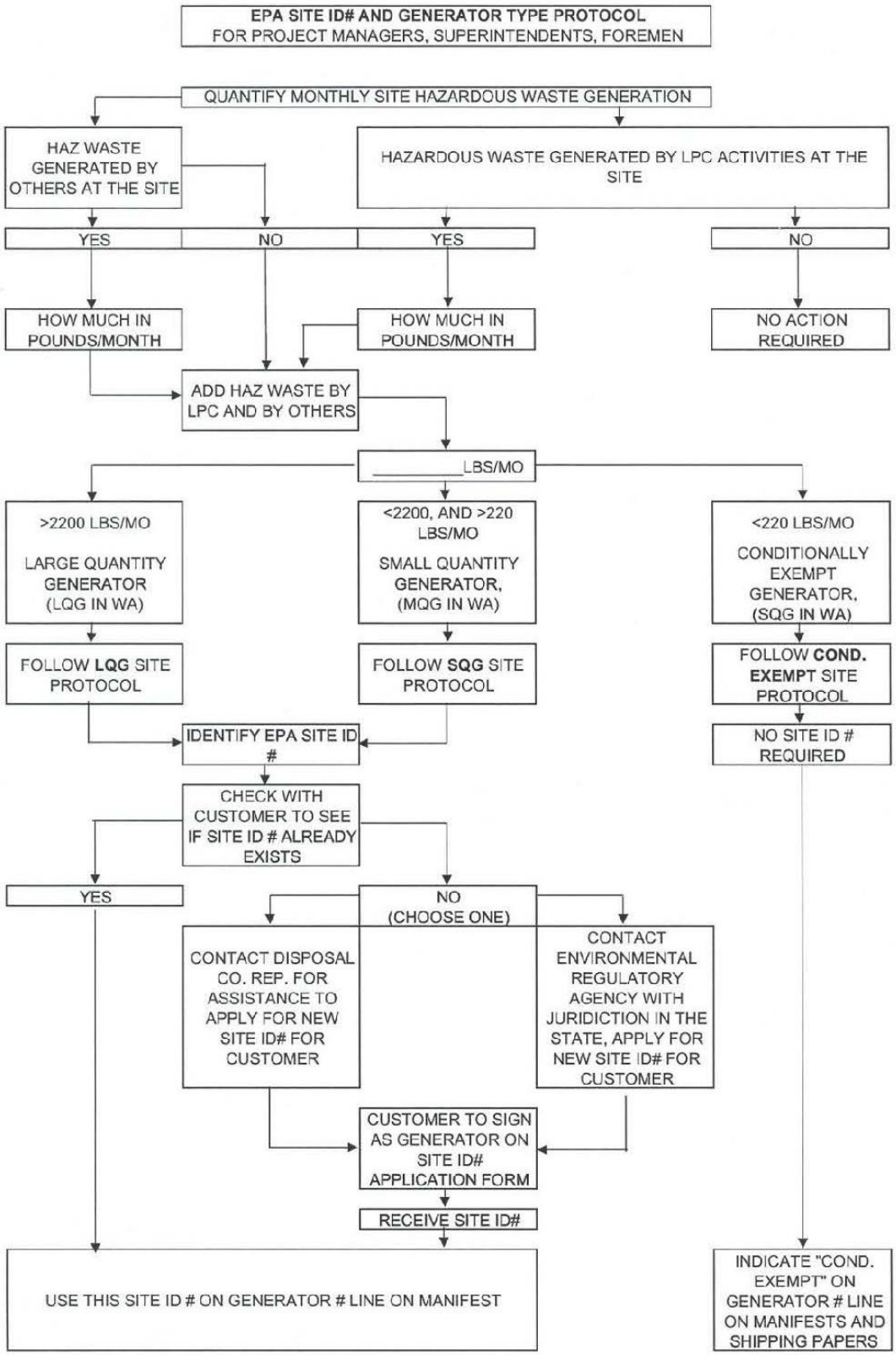
5.3 **Vancouver Facility**

D. Hazardous Material Storage Container

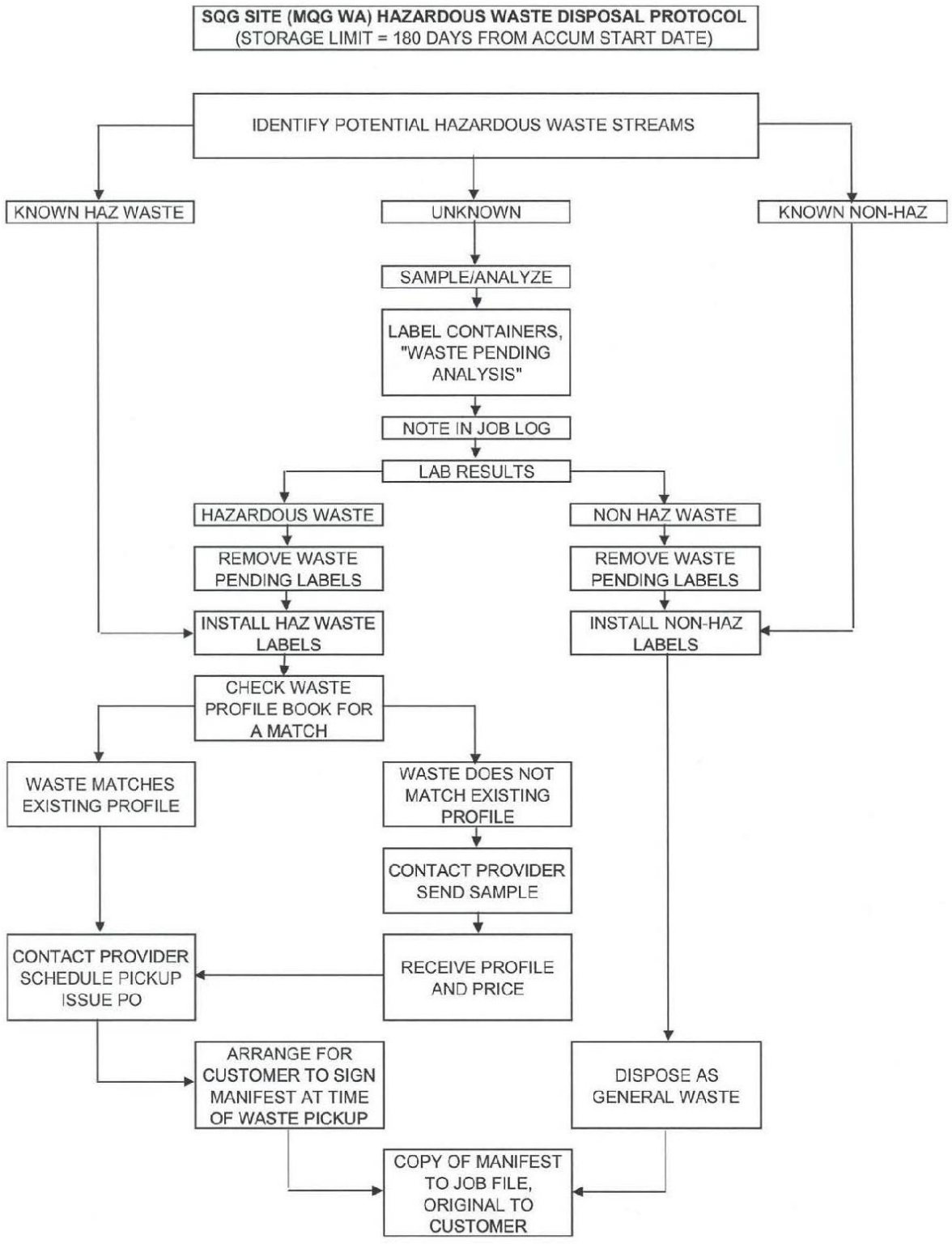
1. All containers properly labeled.
2. All containers of flammable materials and hazardous waste properly closed and sealed at all times. Do not open containers of flammable materials inside the Storage Container.
3. Maintain 30” inch aisles and free access to container doors.
4. Explosion proof tools only. No electric devices, radios, extension cords etc. allowed inside this room unless explosion proof rated.
5. Do not leave hazardous materials outside, move them inside for storage.

6. HAZARDOUS WASTE PROTOCOL, FLOW CHARTS, Maps

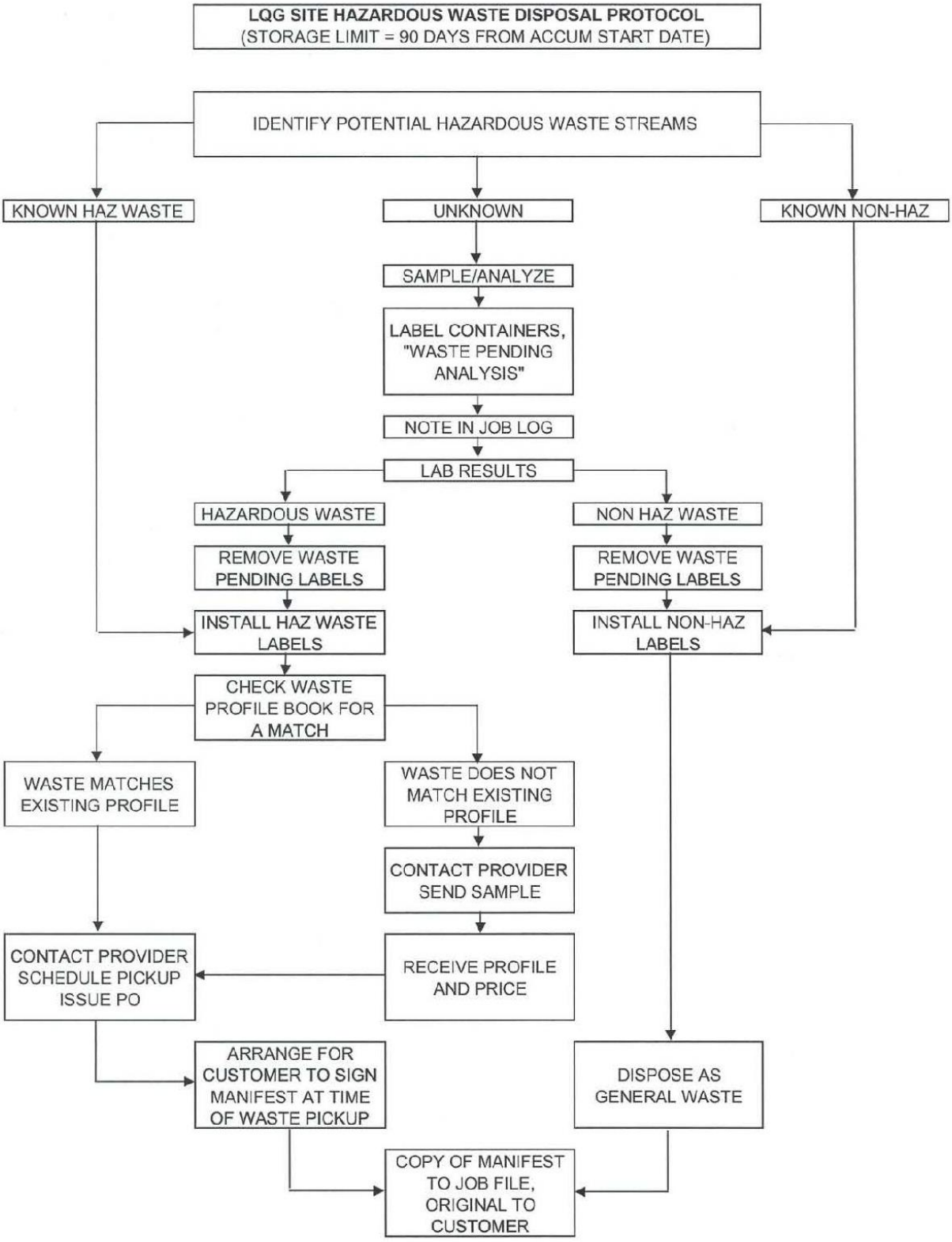
6.1 EPA Site ID# and Generator Type Protocol



6.2 Small Quantity Generator Site



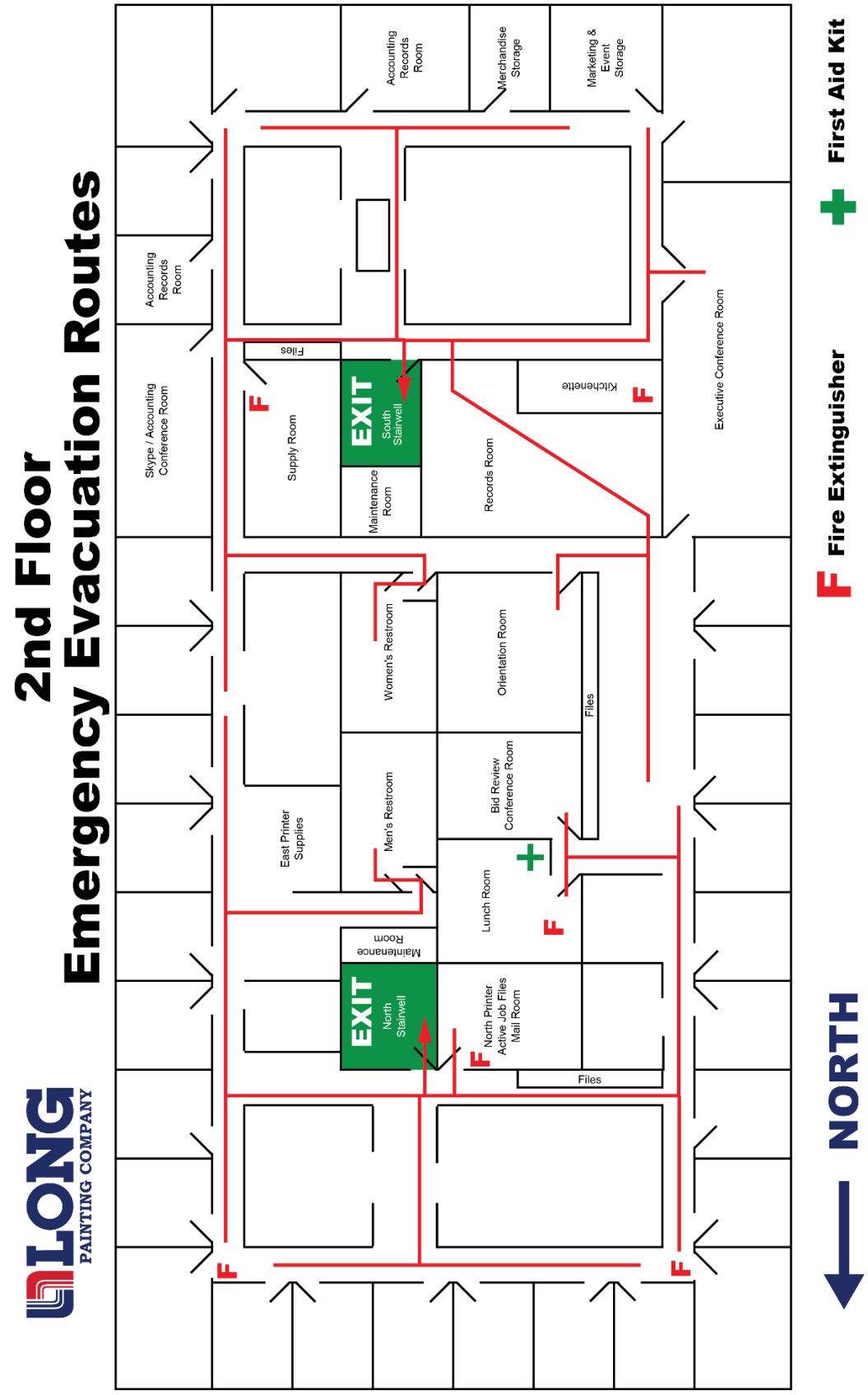
6.3 Large Quantity Generator Site



Paint Related Waste Streams

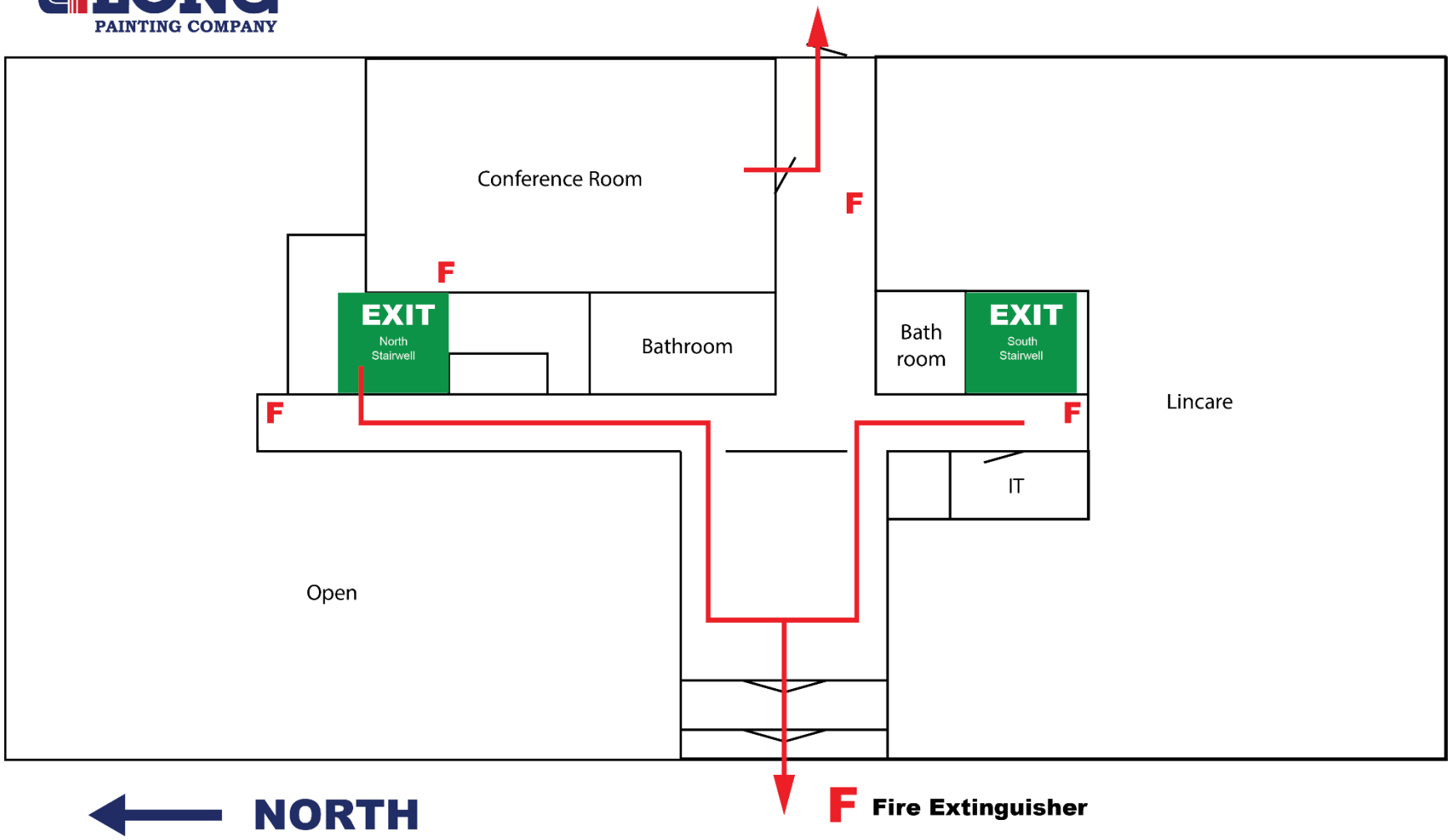
Latex Paint Wastes		Flammable Paint Wastes
Non-Hazardous	**Non-Hazardous General Waste**	**Hazardous Waste**
Wash Water (Sanitary Sewer)	Used Applicator Tools	VOC Containers With > 3% Contents
Latex Wash Water (Landfill)	Used Roller Covers	Used Spill Cleanup Materials
Recycle Latex Paint (Paint Care)	Used Stir Sticks	Hardened / Kicked VOC Paint
Hardened / Kicked Non-VOC Paint (General Waste)	Unusable Roller Screens	Left Over, Non-Usable, Non-Return VOC Product
Misc. Paint Debris (General Waste)	Empty Cans / Buckets	Spent Solvents / Sludges
	Painted Masking Materials	Solvent Rage, Staining Rags, etc.
	Misc. Debris	Items Contaminated With Toxic Materials (Antifoulant Type Coatings for Example)
	Tyvek, Personal Protective Equipment	
	Painted / Oversprayed Plastic Film	
	Wiping Rags	
Transport in Safe Manner to Prevent Spills		Collect for Transport in Properly Labeled and Sealed Containers.

6.5 Site Map Kent Facility

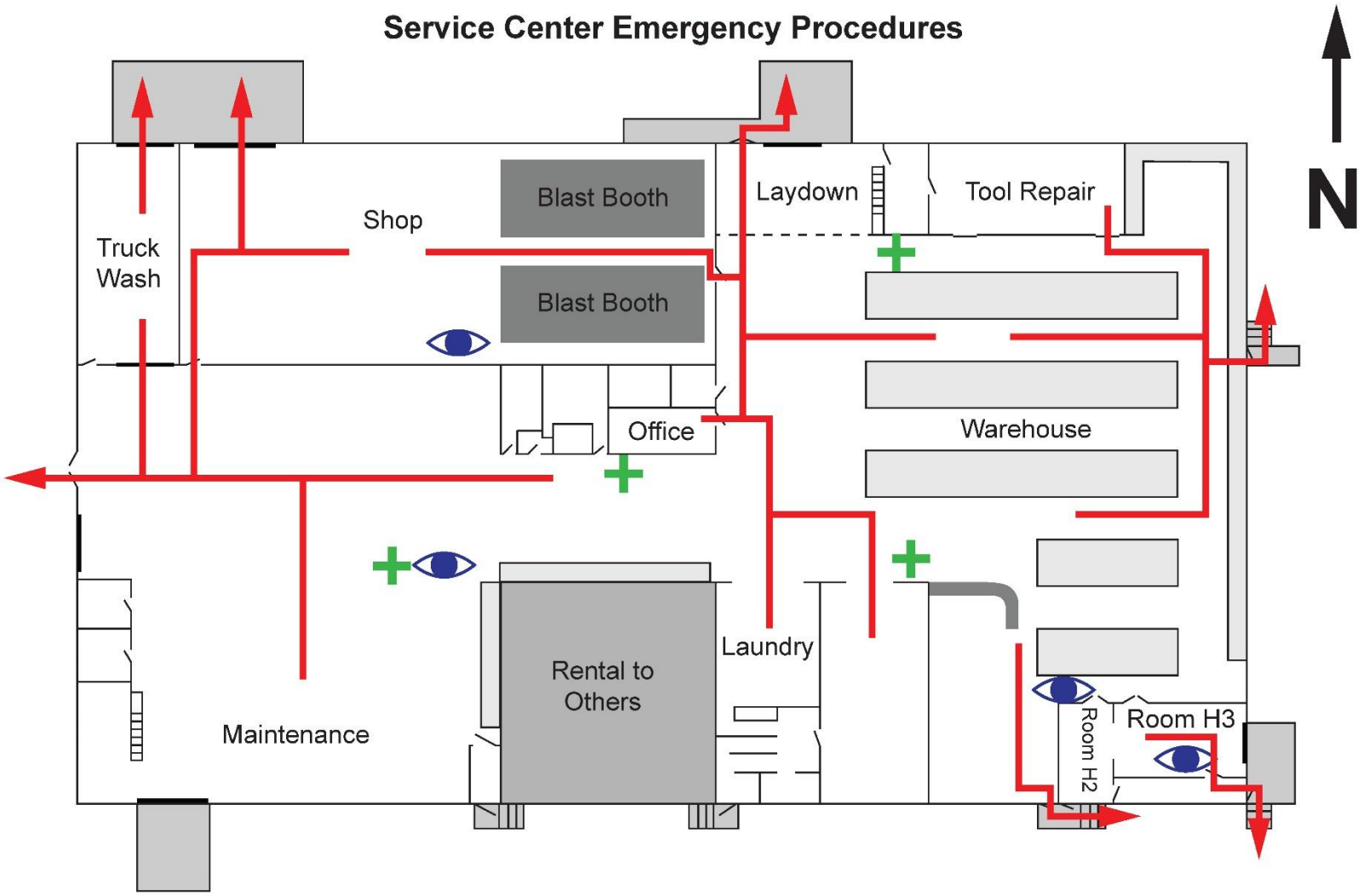


LONG PAINTING COMPANY

First Floor Emergency Evacuation Routes



Service Center Emergency Procedures

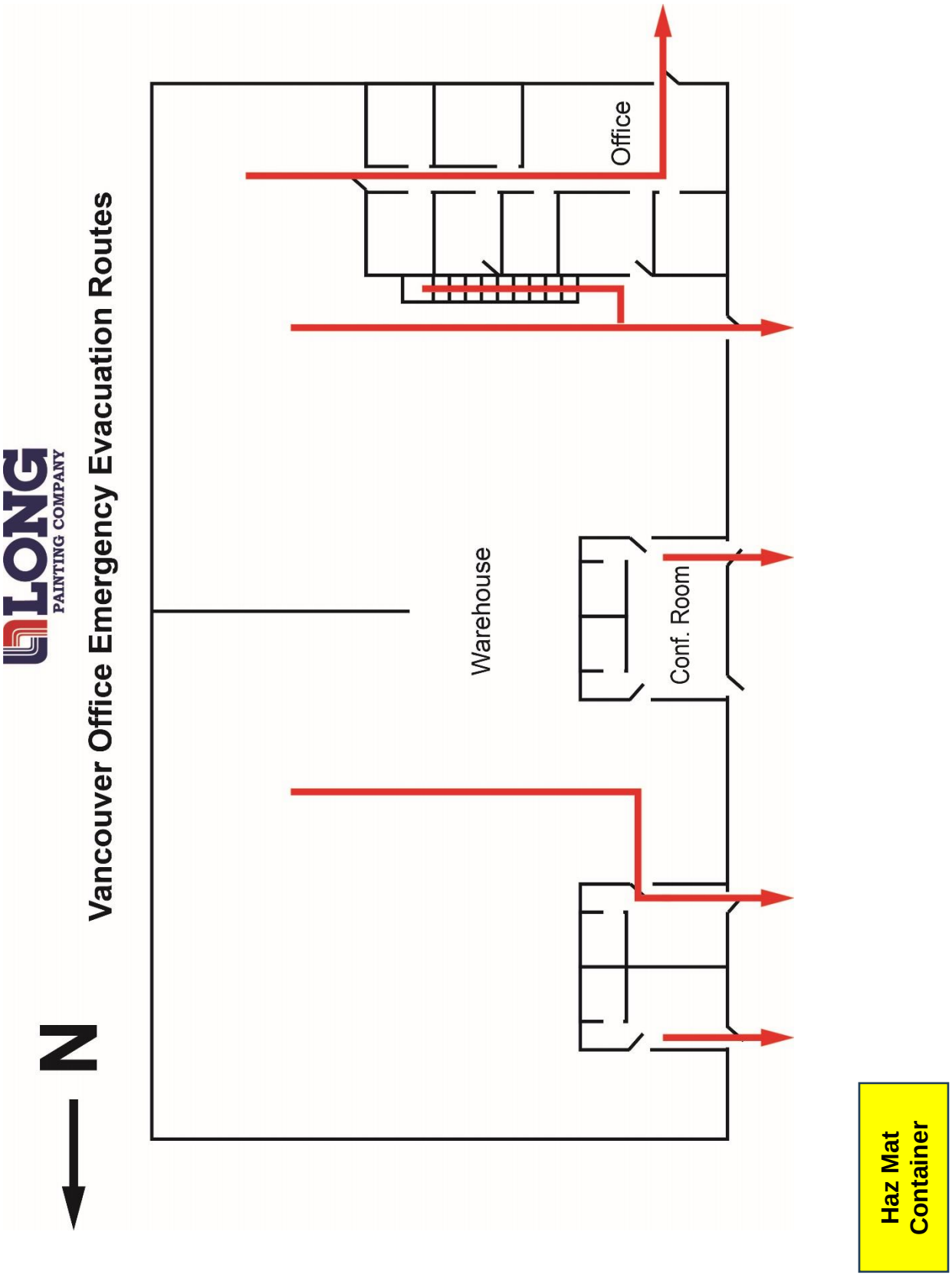


LONG PAINTING COMPANY

First Aid Station

Eye Wash Station

6.6 Site Map Vancouver Facility



N

LONG PAINTING COMPANY

Vancouver Office Emergency Evacuation Routes
Upstairs