Section 9405

Disposal Guidance for Washington State and Oregon State

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9405 Disposal Guidance for Washington State and Oregon State

9405.1 Washington State Disposal Guidance for Disposal of Waste from Spills of Oil and Other Potentially Hazardous Substances

Oil spill recovery and cleanup operations generate large quantities of recovered oil and oily waste. Overlooked waste management issues or delayed actions can result in the cessation of recovery operations, delays in re-deploying equipment, and potential violation of state and federal law. **A Disposal Plan should be developed by the Environmental Unit in coordination with the Operations Section for incorporation into the Incident Action Plan. The Unified Command should assign an appropriate Operations Section staff member (Disposal Group Supervisor) to ensure that the provisions of the Disposal Plan are enacted. Changes or amendments to the Disposal plan based on lessons learned from the Operations Section should be incorporated into this plan as needed.**

9405.1.1 Purpose

This guidance provides a "Guideline" and a "Sample Disposal Plan" for developing incident specific disposal plans at oil spills, more specifically, the treatment and disposal of wastes generated from the cleanup of oil spills. This document's "Guideline" describes how waste must be handled, designated, segregated, tracked, stored, transported, treated, and finally disposed. The "Sample Disposal Plan", provided at the end of this section serves as a model format for incident specific disposal plans. The "Sample Disposal Plan" is designed to directly correspond with the "Guideline".

9405.1.2 Applicability

This document should be used when formulating a waste disposal plan during oil spills and oil spill drills. This document covers all liquid and solid oil and oily debris recovered and generated during oil spill cleanup operations. Oily debris includes but is not limited to: sorbents pads/booms, protective clothing/gear, soil, sand, rocks, logs, kelp, litter, plastics, mousse, oil/water mixture and animal carcasses.

It is the expectation of Ecology that incident specific disposal plans, for oil spill response operations in Washington will be in accordance with the "Guideline" and will follow the "Sample Disposal Plan" format. As per the NWACP Section 4260, incident specific disposal plans should be developed by the Environmental Unit in coordination with the Operations Section. Disposal Plans must be approved by Unified Command.

Historically, since most oily debris generated from oil spills has not designated as dangerous waste in Washington State, this document is focused primarily on solid waste disposal options. This does not preclude the use of this document in the event of hazardous material spills or if hazardous materials are encountered during response clean up. If material is designated as extremely hazardous waste or dangerous waste the requirements for handling and treatment or disposal are more stringent, and it is essential to work with Ecology and local governments to ensure that the wastes are being managed appropriately and in accordance with applicable hazardous or dangerous waste regulations.

The sample plan is general in scope and can be expanded to ensure each waste stream is identified, segregated, and managed in accordance with the regulations.

9405.1.3 Regulatory Authority

Under the provisions of Chapter 90.56.340 RCW (Oil and Hazardous Substance Spill Prevention and Response Act) the **spiller** is responsible for immediately collecting and removing spilled oil and any contaminated debris and/or soil. It is important to recognize that, if the responsible party is unable or unwilling to fulfill this requirement, Ecology is authorized under the provisions of Chapter 90.56.350 RCW "to take such actions as are necessary to collect, investigate, perform surveillance over, remove, contain, treat, or disperse oil or hazardous substances discharged into waters of the state."

9405.2 Washington State Disposal Plan Guidance

9405.2.1 Section I – Waste Managers and Approved Waste Handlers

It is expected that the responsible party will be working closely with local approved waste handlers who are familiar with Washington State's rules and regulations as well as transport and disposal options in the state. The Washington State Department of Ecology Hazardous Waste Services Directory provides an online partial list of companies and the services that they provide (http://apps.ecy.wa.gov/hwsd/). This list is periodically updated. Updated lists can be obtained from any regional office. Only licensed transporters and approved (or permitted) treatment and disposal facilities are to be used for waste handling and disposition unless otherwise directed by Ecology.

9405.2.2 Section II – Designation

The process of classifying wastes, as solid or dangerous waste is known as "designation". Laboratory tests or knowledge of the material must be used to determine if the material designates as dangerous waste. Response personnel

working on sampling plans to characterize waste should coordinate with the disposal folks to organize sampling events and discuss waste profiles.

Based on the types of waste to be characterized, consult with spill contractors, chemical testing laboratories, and the Department of Ecology for advice on designating wastes as dangerous or solid. Designation procedures and waste management requirements are contained in Dangerous Waste Regulations (Chapter 173-303 WAC). The Dangerous Waste Regulations also apply to other wastes and are more stringent than Federal Hazardous Waste Regulations (40 CFR, Parts 261 to 279).

Petroleum products such as bunker, diesel, and kerosene generally do not designate as dangerous waste. Recovered oily liquids and other materials contaminated by oil that do not designate as dangerous waste may be recycled, burned, or blended for fuel, without following the requirements of hazardous waste. Recovered oily liquids may be managed as "off specification fuels" under the exemption in the dangerous waste rules, as long as it is used as fuel. Recovered oily liquids and other materials contaminated by oil that cannot be recycled, burned, or blended for fuel are considered solid waste and subject to designation. Testing is generally required to determine whether such mixtures designate as dangerous waste.

Oily waste may be designated as dangerous waste (dangerous waste or extremely hazardous waste) depending on characteristics such as: ignitability, corrosivity, reactivity, toxicity, and persistence.

Wastes may designate as "dangerous waste" because they are:

- listed (appear on lists for discarded chemical products or from specified industrial processes) or characterized as "dangerous waste" in the absence of knowledge of waste origination.
- ignitable (flash point <140 degrees F);
- corrosive (pH £ 2.0 or ³ 12.5) ;
- reactive (explosive, self-igniting, reactive with water);
- toxic (specific standards and test methods apply, i.e. Toxicity Characteristic Leaching Procedure (TCLP) and DW bioassay; and
- persistent (specific standards and test methods apply).

If a waste is classified as a dangerous waste the responsible party must ensure safe management procedures:

- the waste is placed in proper tanks or stored in closed compatible drums,
- has appropriate labels and markings,
- is transported by authorized haulers,
- is shipped using a Hazardous Waste Manifest,
- is delivered to an authorized recycler or permitted treatment, storage or disposal facility

If recovered oily liquids and other materials contaminated by oil do not designate as dangerous waste then they are classified as solid waste and subject to RCW 70.95.

For mystery spills or responses on derelict vessels: You may encounter many waste streams of unknown origin. If sampling identifies material which would cause the waste to designate as a listed dangerous waste "U, P, or F Listing", as defined in WAC 173-303-082 but there is ***no documentation or evidence*** *to define a known source you may choose not to apply the U-, P- or F-listing defined in WAC 173-303-082..*

If you choose not to characterize as listed waste then, representative samples of the waste must be taken to determine if the waste is characteristic or criteria dangerous waste, as defined in WAC 173-303-090 and -100. The analytical results must then be used to determine the proper route of disposal.

9405.2.3 Section III – Interim Storage, Segregation, and Tracking

9405.2.3.1 Interim Storage Sites

Interim storage sites shall be specifically designated in the incident specific disposal plan. The location of interim storage sites is dependent on the approval of the On-Scene-Coordinator (OSC) and local health department. Interim storage sites shall be established with the goal of preventing additional contamination from being reintroduced to the environment or posing a public health threat. Interim storage sites, and roll-off boxes within these sites, should be lined with plastic tarps or visqueen, and bermed to prevent runoff or leakage of oily material. In addition oily debris should be covered with secured tarps or visqueen to prevent rainwater infiltration. Continued use of interim storage sites beyond 90 days is subject to approval by Ecology. Interim storage sites should be returned to the maximum extent feasible to the sites original condition. Interim storage sites are subject to periodic inspections.

9405.2.3.2 Segregation

The segregation of wastes facilitates the determination of volume spilled and recovered. The purpose of segregation is to assist determining the volume spilled and recovered. It also helps simplify disposal procedures that may be required by incinerator or landfill operators. Material recovered must be segregated in the following manner unless otherwise directed by the State or Federal OSC:

- Oil collected from sources other than state waters/shorelines (e.g. on vessels or pier);
- Oil and oil/water mixtures recovered from state waters/shorelines;
- Oiled organic debris: wood, aquatic vegetation. Oily debris should be placed in **clear plastic bags** for ease of identifying contents and segregation. To the extent possible efforts should be made to homogenize recovered organic debris, e.g., heavily oiled eel grass should be kept separate from dissimilar debris;

- Oiled sorbent material: oil snares, pads, and booms; and
- PPE and other typically non-sorbent materials.

9405.2.3.3 Washington State Oil Recovery Credit for Natural Resource Damage

If the responsible party will seek credit for oil recovery under Washington State's Natural Resource Damage Assessment process, additional segregation is required for product collected during the first 48 hours after the oil release. Detailed guidance on the credit and segregation/measurement methods can be obtained from the Washington Department of Ecology document "Compensation Schedule Credit for Oil Recovery, RDA Committee Resolution 96-1".

9405.2.3.4 Tracking

Continually reporting and updating the Situation Unit with waste management data is a crucial aspect of response. Waste management data is used to assess the progress of the response and to determine potential response needs. Typically waste management data is summarized by the ICS Form 209, which includes total volumes recovered, stored, and disposed of. The Environmental Unit in conjunction with the Situation Unit must assure that this information is accurately reported. Clear lines of communication must be quickly established with Operations to assure that an adequate tracking system is in place. Waste disposal plans should describe the waste tracking system. The use of waste disposition tracking forms is required. The forms in the Sample Disposal Plan, Section IIID and Appendix 1 or forms specifically developed to meet the needs of the response must be used. .

9405.2.3.5 Decanting

Decanting is addressed in a separate section of the Northwest Area Contingency Plan (Section 4650). The decanting approval form should be attached to the Incident Specific Disposal Plan. The Environmental Unit should endeavor to assure that the intent of the decanting approval is followed.

9405.2.4 Section IV – Decontamination

Decontamination areas for personnel and equipment, including oiled booms, need to be addressed in the disposal plan. In addition, areas may need to be set up for the decontamination of oiled vessels. Each area designated as a decontamination site should be addressed in the incident specific disposal plan. The location and set up of each decontamination area should be described in the incident specific disposal plan.

9405.2.5 Section V – Wildlife Operations

A. Wildlife Rehabilitation

Oiled wildlife search and collection and rehabilitation activities generate various liquid and solid wastes. Examples include oily PPE, towels, caging, and wash water. Material generated from oiled wildlife response activities must be incorporated into the spill response waste management system.

B. Wildlife Carcasses

The disposal of animal carcasses may need to be addressed in the disposal plan. Carcass collection activities are overseen by the Wildlife Branch. The collection of migratory birds and sea otter carcasses is overseen by the United States Fish and Wildlife Service. The collection of marine mammals other than sea otters is overseen by NOAA Fisheries. The Washington Department of Fish and Wildlife will assist USFWS and NOAA Fisheries in carcass collection management and activities. Prior to the cleanup of any beach, an agent of the joint trustees should coordinate the removal of oiled carcasses. No oiled carcasses shall be disposed of until authorized by the Wildlife Branch.

9405.2.6 Section IV – Waste Disposition and Final Disposal

It is important that the responsible party work closely with approved waste handler(s) in formulating an Incident Disposal Plan (sample plan in appendix). Local approved waste handlers should be knowledgeable in the appropriate rules and regulations concerning proper waste management, transport, treatment, and disposal facilities. For clarification and assistance the regional office of Ecology and/or local government authorities should be consulted.

- **Hazardous Waste.** The following priorities for the collection, handling, and management of hazardous wastes are necessary, and should be followed in descending order as applicable (Chapter 70.105.150 RCW):
  - Waste reduction;
  - Waste recycling;
  - Physical, chemical, and biological treatment;
  - Incineration;
  - Solidification/stabilization treatment; and
  - Landfill.
- **Solid Waste.** The following priorities for the collection, handling, and management of solid wastes are necessary and should be followed in descending order as applicable (Chapter 70.95.010 RCW):
  - Waste reduction;
  - Recycling, with source separation of recyclable materials as the preferred method;
  - Energy recovery, incineration, or land filling of separated wastes;
  - Energy recovery, incineration, or land filling of mixed wastes
- **Waste Reduction.** Waste reduction is attainable through prevention and minimization of waste generated during cleanup operations. Waste reduction is the responsibility of the responsible party, cleanup contractors and workers.
- **Recycling.** Recovered liquid oil that is exempt from the dangerous waste regulations should be recycled at a licensed refinery or recycling facility. Pads saturated with oil can be wrung out for recovery of liquid oil for recycling.

  Certain solid wastes recovered and generated during cleanup operations can be treated and used again as useful materials. An example is the use of oiled sand, rock and gravel in asphalt production. The waste may be

handled at a treatment facility if it does not designate as a hazardous waste or extremely hazardous waste under Chapter 173-303-070.

Additional options put forth by Hazardous Waste regulation 70.105, include:

- Bioremediation;
- Thermal desorption
- Asphalt incorporation

- **Energy recovery, incineration, or land filling of separated wastes or mixed wastes.** Energy recovery facilities use the oily debris such as sorbent pads, booms, and oily rags, as a supplemental energy source in a rotary kiln. Incineration refers to burning at an approved facility and open outdoor burning. These both require the approval of Ecology and the local air pollution control authority. Controlled burning can be conducted at an approved energy recovery facility or hog fuel burner.
- **Thermal desorption.** With this method heat does not destroy contaminants but separates them from the media. Sufficient heat is applied to vaporize water, organic compounds, and some volatile metals. Vapors can then be destroyed in an afterburner or collected as liquid for further treatment.
- **Outdoor burning.** Open outdoor burning may be a viable option for disposal, if the waste is considered "dangerous material". Prohibited materials may only be burned in an outdoor fire when ordered by a fire protection authority and authorized by Ecology or the local air pollution control authority. However such approval may only be given when the material constitutes "dangerous material" (i.e. materials presenting a danger to life, property or public welfare) and no approved practical alternative method of disposal is available.
- **Land filling.** Upon attaining local health department approval, oily waste may be disposed of in accordance with landfill guidelines and regulations. Landfill disposition should be planned only for those wastes that other disposal options have been found to be unacceptable. Final approval and acceptance of waste material is at the discretion of the landfill operator.

9405.2.7 Final Report

In addition to daily updates of the disposal plan, at the conclusion of response activities and when all parties have signed off on the closure of the response, a final report shall be provided by the responsible party to Ecology within a timely manner. The final report should state in detail the amount of oily waste generated, disposed of and/or treated. The report should be broken down by how the oily waste material was segregated, e.g., oiled sorbents, free liquids recovered, contaminated soil and other material collected. Disposal receipts should be attached to the final report.

9405.2.8 Sample Incident Disposal Plan

Sample Incident Disposal Plan
Model Disposal Plan for Oil Spills in Washington State
(Incident Name)

Responsible Party: _____
Spilled Material: _____
Spill Volume (estimate): _____
Spill Location: _____
Spill Date/Time: _____
Report Update Time: _____

Disposal Plan Authorization
This plan is written at the request of the Incident Command. The maximum feasible amount of oil spilled during the incident will be recovered. In addition an unknown quantity of oily waste debris (including debris, sediment, etc.) will be recovered. All applicable state, local and federal laws and regulations will be followed when recycling or disposing of the recovered material. Disposed material will be tracked to provide an accurate means of estimating total oil recovered. All materials will be categorized and itemized for safe and efficient collection, staging, storage and recycling or disposal. Materials will be tracked to provide an accurate means of estimating the quantities of disposed or recycled materials. Each section of this incident specific disposal plan addresses and corresponds with the waste disposal "Guideline" found in Section 9620 of the Northwest Area Contingency Plan (NWACP).

This plan may be amended as necessary to ensure compliance with all applicable laws and regulations, as new materials or waste streams are encountered, or alternative means of disposal are needed. Amendment may occur only upon mutual agreement of the responsible party, the Federal OSC (USCG/EPA), and/or the State OSC (WDOE/DEQ).

Submitted By: _____ Date: _____

Approved by WDOE: _____ Date: _____

Reviewed by USCG/EPA: _____ Date: _____

Approved by Responsible Party: _____ Date: _____

Approved by other Local Government Representative(s):

_____ Date: _____

Approved by other Tribal Government Representative(s):

_____ Date: _____

The Disposal Plan has been developed by the Environmental Unit in coordination with the Operations Section for incorporation into the Incident Action Plan. Changes or amendments to the Disposal plan based on lessons learned from the Operations Section will be incorporated into this plan as needed.

SECTION I: WASTE MANAGER AND WASTE HANDLERS

Describe the contractors assigned and key roles staffed to support disposal. Describe the responsibilities of each role. Roles may include:

- Disposal Group Supervisor
- Waste Tracking Coordinators
- Technical *Specialists*

Describe the licensed transporters and approved treatment and disposal facilities to be used for waste handling and disposition. Only approved and licensed facilities are to be used unless otherwise directed by Incident Command. Describe how all waste handlers will be briefed and working in accordance with this plan.

Name of Company	Disposal Functions	Company Representative (Name, Phone #)

SECTION II: DESIGNATION

The spilled material was deemed (non-) dangerous waste based on the following:

Describe whether the recovered product will be handled as a hazardous waste based on TSCA/RCRA, state or other regulations, and explain the basis for the decision.

SECTION III: INTERIM SOTRAGE, SEGREGATION, AND TRACKING

A. INTERIM STORAGE OF SOLID MATERIAL

Interim storage sites will be located at:

_____

_____

_____

Provide a description each site, lined roll-off boxes, etc. Describe processes for managing waste at each interim storage site. Describe how each site was constructed, bermed, covered, etc. to minimize infiltration of rainwater and prevent leaching. Describe measures that will be taken to return sites to their original condition.

B. SEGREGATION

Describe measures taken to ensure material recovered was properly segregated. Material recovered must be segregated in the following manner unless otherwise directed by Command:

- *Oil collected from sources other than state waters/shorelines (e.g. on vessels or pier)*
- *Oil and oil/water mixtures recovered from state waters/shorelines*
- *Oiled organic debris: wood, aquatic vegetation, etc. Oily debris should be placed in **clear plastic bags** for ease of identifying contents and segregation. To the extent possible efforts should be made to homogenize recovered organic debris, e.g. heavily oiled eel grass should be kept separate from dissimilar debris.*
- *Oiled sorbent material: oil snares, pads, and booms*
- *PPE and other typically non-sorbent materials*
- *Other*

C. WASHINGTON STATE OIL RECOVERY CREDIT FOR NATURAL RESOURCE DAMAGES

Detail measures taken to ensure segregation as per oil spill recovery credit. See Washington Department of Ecology document "Compensation Schedule Credit for Oil Recovery, RDA Committee Resolution 96-1".

D. TRACKING

Describe the waste tracking system used during this response. Include copies of waste tracking forms, (See Appendix 1 for example). Develop a process to communicate the waste tracking information from the field to the Command Post.

E. DECANTING

Describe decanting operations, if applicable. Decanting authorization form (if approved) should be attached.

SECTION IV: DECONTAMIANTION

Describe the areas designated for decontamination including location, set up, and pollution prevention measures. Example text:

> "A hot/decon/exclusion zone will be set up at each staging area. The decon area will be plastic lined to prevent pollution from oiled PPE and equipment. Oiled PPE and equipment will be collected in plastic barrels."

SECTION V: WILDLIFE OPERATIONS

A. Wildlife Rehabilitation

Oiled wildlife search and collection and rehabilitation activities generate various liquid and solid wastes. Examples include oily PPE, towels, caging, and wash water. Material generated from oiled wildlife response activities must be incorporated into the spill response waste management system.

B. Wildlife Carcasses

The disposal of animal carcasses may need to be addressed in the disposal plan. Carcass collection activities are overseen by the Wildlife Branch. The collection of migratory birds and sea otter carcasses is overseen by the United States Fish and Wildlife Service and the collection of marine mammals other than sea otters is overseen by NOAA Fisheries. The Washington Department of Fish and Wildlife will assist USFWS and NOAA Fisheries in carcass collection management and activities.

Prior to the cleanup of any beach, an agent of the joint trustees should coordinate the removal of oiled carcasses. No oiled carcasses shall be disposed of until authorized by the Wildlife Branch.

SECTION VI: WASTE DISPOSITION AND FINAL DISPOSAL

Refer to ICS form 209 for a summary of recovered waste volumes.

Include copies of waste tracking forms and waste profiles used for final disposal, (See Appendix A for example). Also, include copies of receipts from disposal facilities.

A. RECOVERABLE OIL

Oil recovered will be transported by _____ to _____.

Company Names and contacts

_____

_____

_____

B. BURNABLE MATERIAL

Burnable material includes oil wood, debris, PPE, sorbents, oil snares, and other suitable organic material collected during cleanup operations. The debris will be transported from the interim storage site by _____ to _____.

Transporters	Facility
_____	_____
_____	_____
_____	_____

C. OTHER MATERIALS

This material may consist of sand and tar balls and other assorted material that has been collected from the cleanup effort and has been stored at interim storage sites. All of this material will be transported to a licensed facility.

Transporters	Facility

9405.3 Oregon State Disposal Guidance

The general policy of the Department of Environmental Quality is that, whenever possible, recovered oil and oily debris be recycled and reused, thereby reducing the amount of oily debris to be burned on-site or disposed of at a solid waste landfill. Spilled oils and oil contaminated materials resulting from control, treatment, and clean up shall be handled and disposed of in a manner approved by the Department. General guidelines for the handling, storage, and recycling/reuse or disposal of wastes are discussed below.

9405.3.1 Classification and Segregation

The state of Oregon will utilize its access to federal samples taken by the Coast Guard. As necessary, the state will also utilize sampling capabilities of the DEQ laboratory. All oily waste and debris is classified as a specified waste in the state of Oregon.

The segregation of oily waste and debris is a key part of the disposal process. Oil recovered from an aquatic area will typically contain large amounts of water and debris. Excess water needs to be removed; it increases the amount of material to be transported and can cause problems for disposal facilities. It is most productive to segregate the waste on site to facilitate transportation and disposal. An oil/water separator or a vacuum truck should be available on site to complete this process. Oiled debris needs to be separated out as well. Oil and oily debris should be segregated into the following categories:

- Reuse/Recycle;
- Incinerate;
- Burn on site; and
- Landfill.

9405.3.2 Reuse/Recycle

Whenever possible, recovered oil and oily debris should be recycled and reused, thereby reducing the amount of oily debris to be burned on site or disposed of at a solid waste landfill.

9405.3.3 Incineration

Facilities are available which are capable of burning combustible, oiled debris, subject to any emission limits or restriction of the Air Containment Discharge Permit and Solid Waste Disposal Permit, if applicable.

A 60-day letter permit can be obtained immediately from the Air Quality Division of the Department of Environmental Quality in Portland by the facility to change fuel. In order to obtain this permit, a written request must be submitted including a statement of anticipated emissions based on the petroleum product contaminating the debris to be burned. Consecutive permits may be issued, but an evaluation will be conducted by DEQ prior to combustion.

For a list of facilities capable of incinerating oily debris, consult the appropriate Geographic Response Plan.

9405.3.4 On-Site Burning

Although no specific sites have been identified, the DEQ may authorize a 60-day letter permit for controlled open burning of combustible, oiled debris on the Oregon Coast and portions of the Columbia River in accordance with Oregon Administrative Rules, Division 23. The 60-day letter permit may be obtained from the Air Quality Division of the DEQ in Portland. A written request is required to obtain the permit, and must include the anticipated emissions based on the petroleum product contaminating the debris to be burned. Controlled open burning is defined as follows from most to least preferable:

- Forced air pit incineration;
- Tall stack burning with auxiliary air supply;
- Pile burning with auxiliary air supply; and
- Pile burning.

The DEQ would generally intend to require forced air pit incineration for burning proposed in or near any population center or sensitive area. Combustion efficiency enhancement through utilization of an air curtain or fan devices is generally recommended. There are several areas in Oregon currently regulated by local authorities. They are listed in Division 23 rules for open burning.

9405.3.5 Landfills

There are several landfills which may receive oiled debris, subject to the rules for disposal of spill cleanup materials, any restriction of the Solid Waste Permits, any franchise restrictions, and the concurrence of the owner/operator. See Oregon Administrative Rules Chapter 340, Division 61 on solid waste management.

9405.3.6 Interim Storage

Interim storage site selection will be made on a case-by-case basis. Oregon Administrative Rules Chapter 340, Division 61 on solid waste management addresses the definition of and guidelines for a “disposal site” which includes temporary storage sites.

A letter of authorization for six months can be obtained from the DEQ by written application. The application must contain specific criteria regarding the site; these criteria can be found in Oregon Administrative Rules Chapter 340, Division 61, page 5.

Recovered oil should be stored in sealable containers such as 55-gallon drums, portable pillow tanks, empty fuel storage tanks, tank trucks, barges, or any other available container that can be sealed to prevent spillage. If necessary, a pit can be dug to hold the waste and lined with plastic or polymeric sheeting to prevent leaching.

Oily debris should be placed in leak-proof containers, such as plastic bags or debris boxes, provided they are lined with plastic. Debris should be stored on impermeable sheeting to prevent penetration into the soil should a breach of the container occur.

Temporary storage sites should be located with good access to the cleanup operations and nearby streets and highways. Good sites are flat areas such as parking lots or undeveloped lots, with a minimum of slope to reduce potential contamination from leaching oil. Sites should be at least three meters above mean sea level. A 1- to 1-1/2 meter high earth berm should be constructed around the perimeter of the site and the site lined with an impermeable liner to the top of the berm.

After oiled debris is in storage, a monitoring program should be set up to ensure that oil is not escaping outside the berm. Free oil accumulation within the bermed area should be monitored as well. For specific guidance on hazardous waste determination see 'How to Determine if Your Waste is Hazardous' at http://www.deq.state.or.us/lq/pubs/factsheets/hw/HazardousWasteDetermination.pdf

9405.3.7 Transportation

Transportation of oiled debris to its disposal destination is the contractor's responsibility. Certified haulers should be used. Trucks should be lined with plastic or otherwise made leak-proof in order to prevent leakage during transport.

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Appendix 9405 A Waste Management Tracking Forms

WASTE MANAGEMENT TRACKING FORM FOR INCIDENT: _____ Update

Time: _____

Recovery Location(s)	Time Recovered		Volume (Gallons*)	Type of Waste	Projected Interim Storage Demand **
	From:	To:			

* Cubic Yards for Solids

** Means to address demand per location per time.

INTERIM STORAGE TRACKING

Interim Storage Location(s)	Received From Location(s)	Time Received	Volume (Gallons *)	Type of Waste

* Cubic Yards for Solids.

FINAL DISPOSAL

Disposal Facility Location(s)	Received From Location(s)	Time Received	Volume (Gallons *)	Type of Waste

* Cubic Yards for Solids.