

Attachment D
Waste Storage, Processing and Tracking Plan

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1. Introduction

Triumvirate Environmental (Arizona) Inc. ("Facility") is a commercial hazardous waste management facility that accepts a wide variety of hazardous wastes from various industrial and commercial operations. These wastes include halogenated and non-halogenated solvents, waste oil, acid and alkali solutions, cyanide-bearing solutions, chemical compounds from laboratories, oily solids, metal hydroxide sludges, and other contaminated solids. The Facility only accepts wastes it is authorized to accept in accordance with its Part A Permit Application. General descriptions of these wastes are provided in Section 1.2 of Attachment B - Waste Analysis Plan.

The Facility's waste management activities consist of waste storage in tanks and containers, and waste processing that includes fuel blending, waste stabilization, cyanide destruction (liquid wastes only), chemical oxidation of wastewaters, consolidation (bulking), and truck-to-truck transfers. Wastes are received at the Facility in containerized and bulk shipments and are handled in accordance with procedures described below.

2. Waste Storage

2.1 CONTAINER STORAGE

Upon receipt of a load of containerized waste, the acceptance procedures described in [Attachment B - Waste Analysis Plan](#) are used to determine in which storage room the waste containers will be stored. Containers on pallets are typically unloaded from the vehicles and moved around the Facility using lift trucks (forklifts) with conventional forks. Non-palletized 55-gallon drums are also removed from the vehicle and moved around the Facility using a drum dolly (hand truck) or a forklift equipped with a specialized tool (i.e., drum grabber) designed to grab and lift drums. Other non-palletized containers are unloaded using drum dollies, forklifts, or drum hoists. Drums and smaller containers are palletized prior to being moved into their designated storage rooms. Table D-1 provides the schedule that is used to designate the storage room/area for waste containers:

Table D-1
Schedule for Designating Storage Rooms/Areas for Waste Containers

| Waste Type | Category Code(s) from the WAP | Storage Room(s)/Area(s) |
|--|-------------------------------|---|
| Flammable and combustible waste Liquids and Solids, except Class 1A flammable solids | 1a, 1b, 1c, 1d | Room 102 Room 124 Loading Dock 100 (containers and roll-offs) |
| Class 1A flammable solids | 1b, 1c, 1d | Room 124 |
| Corrosive waste liquids | 1a, 1c, 1d | Room 105 Loading Dock 100 (containers) |
| Corrosive waste solids | 1b, 1c, 1d | Room 105 Area 127 (roll-offs) |

Table D-1
Schedule for Designating Storage Rooms/Areas for Waste Containers

| | | |
|---|----------------|---|
| | | Loading dock 100 (containers and roll-offs) |
| Cyanide waste liquids | 1a, 1c, 1d | Room 103 Loading Dock 100 (containers and roll-offs) |
| Cyanide waste solids | 1b, 1c, 1d | Room 103 Area 127 (roll-offs) Loading Dock 100 (containers and roll-offs) |
| Toxic and highly toxic wastes | 1a, 1b, 1c, 1d | Room 103 Area 127 (roll-offs) Loading Dock 100 (containers and roll-offs) |
| Water Reactive waste liquids and solids | 1a, 1b, 1c, 1d | Room 121 |
| Pyrophoric liquids and solids | 1a, 1b, 1c, 1d | Room 120 |
| Lab Packs | 2 | Room 102 Room 103 Room 105 Loading Dock 100 (containers) |
| Consolidation containers | 3 | Room 103 Area 127 (roll-offs) Loading Dock 100 (containers and roll-offs) |
| Debris | 4 | Room 103 Area 127 (roll-offs) Loading Dock 100 (containers and roll-offs) |
| Consumer products, except compressed gases | 5 | Room 103 Loading Dock 100 (containers) |
| Compressed gases | 5 | Area 126 |
| Universal wastes (except lithium batteries) | 6 | Any room or area |
| Universal Waste Lithium batteries | 6 | Room 120 Room 121 |

If the containers cannot be unloaded on the day of arrival at the Facility, the vehicle is temporarily staged in Loading Dock 100.

All containers are inspected when they are unloaded from the vehicle. If any container is found to be damaged or otherwise unsuitable for storage, the waste is repackaged in an appropriate container, or the damaged container may be overpacked.

2.2 BULK WASTE STORAGE

2.2.1 Flammable and Combustible Waste Liquids

Bulk loads of flammable and combustible liquids (and other organic-containing liquids) are received at the Facility in tank trucks and railcars. Bulk loads are normally be sampled prior to unloading the vehicles to verify the waste shipments match the approved waste profiles. Sampling and analysis follow the Waste Analysis Plan. Once verification is made, the vehicle is unloaded into one or more of the eight, 19,500-gallon storage tanks in Area 128. However, if a storage tank is not immediately available, tank truck(s) are temporarily staged Loading Dock 100, and railcar(s) will be temporarily staged at the railcar unloading rack until storage tanks become available.

Typically, the Facility resolves waste profile discrepancies prior to unloading the vehicle; however, there are instances in which a vehicle may be unloaded prior to resolution at the discretion of the Facility Manager. Similarly, at the discretion of the Facility Manager, a vehicle may also be unloaded prior to verification.

Tank trucks are unloaded by positioning the truck within the truck secondary containment located immediately to the north of the Area 128 tank farm. A hose extending from the tank truck is connected to the appropriate hard piping of the designated 19,500-gallon storage tank. Railcars are unloaded by positioning the railcar within the railcar secondary containment. A hose extending from the railcar is connected to the appropriate hard piping at the overhead pipe rack corresponding to the designated 19,500-gallon storage tank.

2.2.2 Corrosive Waste Liquids

Bulk loads of corrosive liquids are received at the Facility in tank trucks and railcars. Bulk loads are normally sampled prior to unloading the vehicle to verify the waste shipment matches the approved waste profile. Sampling and analyses follow the Waste Analysis Plan. Once verification is made, the vehicle is unloaded into one or both of the two, 19,500-gallon storage tanks in Area 125. However, if a storage tank is not immediately available, tank truck(s) are temporarily staged Loading Dock 100, and railcar(s) are temporarily staged at the railcar unloading rack until storage tanks become available.

In certain instances, corrosive waste liquids loads may be unloaded from the vehicle prior to sample collection or waste profile discrepancy resolution at the discretion of the Facility Manager.

Tank trucks are unloaded by positioning the truck within the truck secondary containment located immediately to the east of the Area 125 tank farm. A hose extending from the tank truck is connected to the appropriate hard piping of the designated 19,500-gallon storage tank. Railcars are unloaded by positioning the railcar within the railcar secondary containment. A hose extending from the railcar is connected to the appropriate hard piping at the overhead pipe rack corresponding to the designated 19,500-gallon storage tank.

2.2.3 Bulk Solid Waste

Bulk loads of solid wastes are received at the Facility in dump trucks, end-dump (pneumatic) trailers, and railcars. Bulk loads will be sampled prior to unloading the vehicles to verify the waste shipments match the approved waste profiles. Sampling and analysis follow the Facility's waste analysis plan. Once verification is made, the vehicle may be:

- Unloaded and stored in one of the two 80-cubic yard, solid waste storage tanks located in Area 107; or
- Unloaded into roll-offs and moved into storage in either Area 127 or Loading Dock 100; or
- Unloaded in one of the two, 80-cubic yard, solid waste storage tanks located in Area 107 and stabilized; or
- Unloaded into roll-offs and stabilized in Area 127 or the railcar unloading area.

Dump trucks and end-dumps are unloaded by dumping the load directly into one of the two solid waste storage tanks using the vehicle's dumping mechanism. Solid waste arriving in a railcar is unloaded at the railcar unloading area using a backhoe or excavator and transferred to roll-off bins. Solid waste arriving in a dump truck or end dump is also unloaded in Area 107 using a backhoe or excavator and transferred to roll-off bins.

3. Waste Processing

3.1 FUEL BLENDING

Hazardous waste accepted at the Facility for fuel blending includes flammable and combustible waste liquids and other liquids with appropriate organic content.

3.1.1 Bulk Flammable and Combustible Liquids

Flammable and combustible liquids (and other organic liquids) that are unloaded and stored in the eight 19,500-gallon storage tanks described in [Section 2.2.1](#) are generally blended into supplemental fuel. Waste materials being stored in the tanks may be blended as a single batch of fuel, or co-mingled with compatible flammable and combustible waste liquids and other organic liquids in one or more tanks and processed into multiple batches of fuel.

3.1.2 Containers of Waste Flammable and Combustible Liquids

Containers of flammable and combustible liquids and other organic liquids that are scheduled for fuel blending remain in their storage locations until the full blending activities take place. At that time, the containers are relocated to the pump room and the contents are pumped into one or more of the eight, 19,500-gallon storage tanks. Containerized waste may be blended as a single batch of fuel, or co-mingled with compatible flammable and combustible waste liquids and other organic liquids in one or more tanks and processed into multiple batches of fuel.

3.2 STABILIZATION

Typical materials to be stabilized are inorganic wastewater treatment (WWT) sludges, media with metals, contaminated soils, sand blast grit, incinerator ash, incinerator slag, emissions control dust and debris. Waste material can be wet, sticky, cohesive, dusty; and could contain rock, concrete, rags, wire, or other debris. Wastewater from equipment wash down, treated wastewaters, or compatible hazardous and non-hazardous wastewater received at the Facility may be used as the water source in the stabilization process.

3.2.1 Bulk Loads for Stabilization

Bulk loads for stabilization are unloaded and stored the 80-cubic yard tanks in Area 107 described in [Section 2.2.3](#) are generally processed as individual batches in the same storage tank; however, smaller bulk quantities of solid waste that have similar characteristics, compatible EPA waste codes, and the same stabilization recipe may be combined to increase the batch size for processing. Bulk loads that are unloaded and transferred into one or more roll-off bins may be added to a larger batch in one of the 80-cubic yard storage tanks, or they may be stabilized as individual batches in the roll-off bins located in Area 107, Area 127, or the railcar unloading area.

3.2.2 Containerized Waste for Stabilization

Containers of material to be stabilized are added to larger batches that have similar characteristics, non-conflicting EPA waste codes, and the same stabilization recipe. The containers remain in their storage locations until the stabilization process takes place. At that time, the containers are relocated to the appropriate location (i.e., Area 107, Area 127, or the railcar unloading area).

3.3 CYANIDE DESTRUCTION

Cyanide-containing wastes that are accepted at the Facility include wastes with complex cyanide, wastes with free cyanide, and weak acid dissociable cyanides (i.e., cyanide complexes with metals such as cadmium, copper, nickel, and zinc). Both liquid and non-liquid waste containing cyanides are accepted at the Facility; however, only liquid (aqueous) cyanide bearing waste is treated onsite. Cyanide destruction is carried out via alkaline chlorine-hypochlorite oxidation.

3.3.1 Bulk Waste Cyanide Liquids

Bulk loads of waste cyanide liquids are received at the Facility in tank trucks. Bulk loads are normally sampled prior to unloading the vehicle to verify the waste shipment matches the approved waste profile. Sampling and analyses follow the Facility's waste analysis plan. Once verification is made, the vehicle is unloaded into one of the two, 19,500-gallon storage tanks in Area 125. However, if a storage tank is not immediately available, tank truck(s) are temporarily staged in Loading Dock 100.

Bulk loads of waste cyanide liquids may be unloaded from the vehicle prior to sample collection or waste profile discrepancy resolution at the discretion of the Facility Manager.

Tank trucks are unloaded by positioning the truck within the truck secondary containment located immediately to the east of the Area 125 tank farm. A hose extending from the tank truck is connected to the appropriate hard piping of the designated 19,500-gallon storage tank.

3.3.2 Containerized Waste Cyanide Liquids

Containers of waste cyanide liquids remain in their storage locations until the treatment process takes place. At that time, the containers are relocated to the pump room and the contents are pumped into one of the two 19,500 gallon tanks in Area 125. Containers of waste cyanide liquid may be added to a larger batch of compatible waste for cyanide destruction, or they may be bulked into a separate tank as an individual batch for cyanide destruction.

3.4 CHEMICAL OXIDATION

Wastewaters accepted at the Facility include those that contain elevated concentrations of organic constituents. These wastewaters may be treated by advanced oxidation to reduce the overall organic content at the discretion of the Facility Manager.

3.4.1 Bulk Loads of Wastewater

Bulk loads of wastewater with elevated concentrations of organics constituents are received at the Facility in tank trucks and railcars. Bulk loads are normally sampled prior to unloading the vehicle to verify the waste shipment matches the approved waste profile. Sampling and analyses follow the Facility's waste analysis plan. Once verification is made, the vehicle is unloaded into one or both of the two, 19,500-gallon storage tanks in Area 125. However, if a storage tank is not immediately available, tank truck(s) are temporarily staged in Loading Dock 100, and railcar(s) are temporarily staged at the railcar unloading rack until storage tanks become available.

Tank trucks are unloaded by positioning the truck within the truck secondary containment located immediately to the east of the Area 125 tank farm. A hose extending from the tank truck is connected to the appropriate hard piping of the designated 19,500-gallon storage tank. Railcars are unloaded by positioning the railcar within the railcar secondary containment. A hose extending from the railcar is connected to the appropriate hard piping at the overhead pipe rack corresponding to the designated 19,500-gallon storage tank.

3.4.2 Containerized Wastewater

Containers of wastewater remain in their storage locations until the treatment process takes place. At that time, the containers are relocated to the pump room and the contents will be pumped into one of the two 19,500-gallon tanks in Area 125. Containers of wastewater may be added to a larger batch of compatible waste for treatment, or they may be bulked into a separate tank as an individual batch for treatment.

3.5 CONSOLIDATION

Wastes that are to be consolidated into bulk prior to shipment are stored in their appropriate storage rooms until consolidation activities take place.

3.5.1 Consolidation of Solid Hazardous Wastes

Compatible solid hazardous waste stored in containers which can be disposed together at an offsite facility may be consolidated into a single roll-off container for transportation to the offsite disposal facility.

Only hazardous waste that has passed the acceptance procedures described in the Waste Analysis Plan will be bulked into roll-off containers to ensure that all bulked hazardous wastes are compatible and will not react when placed into the roll-off containers.

Prior to loading a roll-off, the Facility assesses the type of waste designated for the outgoing shipment. Except for oily solids, the deciding factor to loading any roll-off is pH. If, for example, the Facility has received a large quantity of solids from an acid spill, the next outgoing roll-off will be limited to wastes that exhibit a pH of 7 or less. Conversely, if the Facility has taken in a large quantity of metal hydroxide sludge, the next outgoing roll-off will be limited to wastes that exhibit a pH of 7 or higher.

When bulking oily solids (e.g., waste oil-contaminated soils), the Facility follows the applicable acceptance procedures in the Waste Analysis Plan to ensure that the oily solids do not exhibit hazardous waste characteristics or contain PCBs.

3.5.1.1 *Roll-off Container Preparation*

The Facility uses roll-off containers that range in size from 10 to 50 cubic yards. All roll-offs are visually inspected for integrity and mechanical malfunctions prior to being filled. A roll-off that fails inspection is replaced with another roll-off that meets inspection requirements.

Approved roll-offs are placed into the storage bays by either the delivering vehicle or by a forklift. Tar or other sealing compounds may be used on the inside of the roll-off to ensure water-tightness of the gasketed door. After the gate of the roll-off is sealed, a 6-mil poly liner is placed into the roll-off to eliminate the need to decontaminate the roll-off and to act as an additional barrier in the event that some free liquid settles out of the bulked waste during shipment.

3.5.1.2 *Consolidation Process*

Drums of hazardous waste solids are consolidated into the roll-off using forklifts equipped with hydraulic clamps that enable the operator to empty the contents of the containers mechanically rather than by manual labor. The process starts by removing the bolt, ring, and lid of the open-head drum. If solids remain in a tight-head drum after liquid is removed, the drumhead is removed by cutting it with a non-sparking drumhead cutter.

The operator of the forklift will then pick up the drum with the clamps and position the drum over the roll-off. Once in position, the operator engages a hydraulic piston on the forklift, which causes the drum to rotate away from the operator approximately 180 degrees. Typically, most of the hazardous waste will fall out of the drum into the roll-off. After the contents are removed from the drum, the forklift re-engages the hydraulic piston, which causes the drum to return to its original upright position. The drum is then positioned on the dock by the forklift operator where a worker removes the residue that remains in the drum using a shovel or similar hand tool and transfers the residue into the roll-off container. Any spillage from this process is immediately cleaned up and placed in the roll-off.

When cubic yard containers are bulked into roll-off containers the same process is used with slight modification. Rather than using the hydraulic clamps to grab the container, the forks are used because the cubic yard containers are always nailed to pallets. The cubic yard box set up is one quarter-inch of corrugated cardboard surrounding a 6-mil poly bag into which waste is placed. The poly-bag acts as a buffer to keep the dampness of the waste from coming in contact with the cardboard, which would otherwise weaken the structural integrity of the container.

Cubic yard boxes are brought from storage to the loading dock where the waste is bulked into roll-offs. One side of the cardboard box is cut using a razor or other cutting tool, and then the box is lifted above the roll-off. When the cardboard is cut, the waste remains in the container because of the plastic liner. Once the container is above the roll-off, the operator tilts the forklift and the waste, along with the box's liner falls out of the box into the roll-off. The remaining cardboard cubic yard box is disposed of as a non-hazardous solid waste if the box has not been contaminated. If there is evidence of contamination, the entire cubic yard box is cut up and put into the roll-off for disposal.

On rare occasions, roll-off containers are emptied at the Facility when wastes are transferred from one roll-off to another. This scenario could take place if either a roll-off was delivered as a transient shipment and was found to be leaking, or a 10-yard roll-off was used at a site of generation due to space limitations and such waste was transferred into a larger roll-off containing compatible waste.

Roll-offs are always covered with a tarp when not in use or during non-working hours. Aluminum "bows" are used on the roll-off in order to limit the amount of contact between the waste and the tarp which covers the roll-off and to prevent rainwater from entering the roll-offs.

Waste released from the roll-off during the consolidation process are contained by the surrounding bermed area. The sealed concrete surface under the roll-off is impenetrable to both water and/or oil. The Facility's use of liners in the roll-offs mitigates the need to decontaminate roll-offs after the waste has been removed from the roll-off. Before roll-offs are re-loaded, a new liner is placed inside the roll-off, which eliminates the potential for a reaction with residues from the previous load.

3.5.2 Consolidation of Liquid Hazardous Wastes

Hazardous waste liquids may be consolidated from drums or pails into larger containers or a single storage tank. Similarly, small bulk loads may be consolidated into a single storage tank. Prior to consolidation, all

materials go through applicable screening and analytical processes identified in the Waste Analysis Plan. Containers and tanks used for the bulking of flammable and combustible waste are bonded and grounded. Reactive wastes are never consolidated with flammable or combustible wastes.

3.5.2.1 Bulking Hazardous Waste Liquids in a Container

Typically, the container into which liquid hazardous waste will be bulked will be clean. Prior to bulking operations, the container will be verified to be clean and empty. However, if a container is used that previously held a hazardous material or hazardous waste is used, verification will be made that any residue remaining in the container is compatible with the waste to be added to the container.

Hazardous waste to be bulked will be identified by trained personnel, composite sampled and tested for compatibility. Any change in temperature or other evidence of chemical reaction observed during compatibility testing (prior to bulking) will disqualify the material for bulking.

Liquid hazardous waste may be pumped into the container using hand pumps or mechanical pumps, depending on the volume of liquid waste to be transferred.

3.5.2.2 Bulking Hazardous Waste Liquids in a Tank

Prior to bulking in a storage tank, personnel will verify that the liquid hazardous waste to be bulked is compatible with the batch of waste previously stored in the tank. Hazardous waste to be bulked will be identified by trained personnel, composite sampled and tested for compatibility. Any change in temperature or other evidence of chemical reaction observed during compatibility testing (prior to bulking) will disqualify the material for bulking.

3.6 TRUCK-TO-TRUCK TRANSFERS

In connection with the Facility's 10-day transfer activities, it may be necessary to conduct truck-to-truck transfers of hazardous waste containers between two vehicles in a designated truck transfer area at the Facility. Truck-to-truck transfers are sometimes necessary to achieve a full load of containers destined for the same designated treatment/storage/disposal facility. Truck-to-truck transfers are performed in Loading Dock 100, which provides secondary containment in case of container rupture.

During truck-to-truck transfers, containers of hazardous waste on a "staged vehicle" are unloaded and immediately reloaded onto a second vehicle. A "staged vehicle" is a vehicle that is carrying a shipment of hazardous waste in containers that is manifested to a designated facility other than Triumvirate. The second vehicle can be a second "staged" vehicle carrying a load of hazardous waste containers to the same designated facility, or it can be an empty vehicle into which containers from two or more staged vehicles are loaded.

A “staged vehicle” is vehicle that is carrying a shipment of hazardous waste in containers that manifested to a designated facility other than Triumvirate, and which does not show Triumvirate as the generator in section 5 of the manifest. A fully loaded, staged vehicle will remain in one of the Facility’s designated 10-day transfer areas until departure, which is typically five days or less, not including weekends or holidays. The designated 10-day transfer areas include the southernmost truck bay in Loading Dock 100 and the 20 truck parking spots located on the west side of the Facility.

Each truck-to-truck transfer is documented in the operating record (transfer log) identifying the vehicle numbers, date of transfer, number of containers transferred, and manifest numbers involved. Once the container transfer is complete, the accompanying manifest(s) is modified, as necessary, to reflect the continuing transport of the transferred containers, and the vehicles continue their shipments to their next intended destination within the allowable timeframe.

Partial transfers of containers identified on a single manifest, and truck-to-truck transfers of bulk hazardous waste are not performed.

4. Waste Tracking

The Facility uses two computer applications to track and account for waste shipments as they are received stored, processed, treated, handled, repackaged, consolidated, and shipped out of the Facility. The first application is a custom-made application called “Wasteland.” This application tracks profile approvals/history and incoming manifests. The second application is called “Barcode” which is used to track the movement of waste shipments through the Facility. Collectively, the information maintained on these two systems is referred to as “The Inventory.” Wasteland, Barcode, and their associated databases are housed on a server that is located at Triumvirate’s office in Somerville, Massachusetts. A general description of the tracking process and how it functions is provided below.

When the Facility accepts a shipment of waste, basic shipping information and physical/chemical characteristics of the waste shipment are entered into Wasteland and Barcode. The entry of basic shipping data into Barcode, which is referred to as “adding waste to the inventory,” may be performed manually or through automatic data import from Wasteland.

After the basic shipping data have been entered into Barcode, it automatically assigns a unique numeric ID and barcode to the bulk shipment, and in the case of a containerized shipment, a unique numeric ID and barcode to each individual container. The application gives Facility employees the ability to print adhesive-backed barcode labels which are applied to the appropriate tank (for bulk shipments) and containers before the containers are moved to the designated storage areas.

A barcode of each unique tracking number will be printed for each container and affixed to that container. For a bulk shipment, the barcode is affixed to a placard attached to the designated storage tank. The barcode will have generator name, date received, Waste Profile Form (WPF) approval number and a waste process code. The waste process code identifies the onsite storage and/or processing that will be

utilized to handle the waste material. The process code will also identify the offsite treatment/disposal facility to be used if the waste is not processed/treated onsite.

Facility staff members are responsible for updating the information in the barcode system to reflect the location of each container and bulk shipment in the Facility. If containers are consolidated, or if a bulk shipment is transferred from one tank to another, the system is updated and new barcodes with updated location information are printed and affixed to the designated tank(s).

The inventory is updated via computer whenever waste (bulk or containers) is shipped out of the facility. The process of shipping waste out of the Facility is referred to as “removing waste from the Inventory”. Daily backups of data collected using Wasteland and Barcode are formed to an offsite server. A current record of all waste present at the Facility is maintained electronically as well as in the administration office and/or the laboratory.