OTHER HAZARDOUS MATERIALS

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The South Annex Building did go through an extensive light retrofit project resulting in the replacement of most if not all existing light fixtures which may have ballasts present. As a result, it is expected most if not all ballasts are now electronic (this type is PCB free) or the manufacturers label on the ballast states "No PCBs". However, if any ballasts are found present which do contain PCBs or do not clearly state "No PCBs" the ballasts must be treated as containing PCBs until properly tested. Therefore, the following procedures and information is included for this project to provide the Contractor with information relevant to this possibility. Light fixtures also contain fluorescent tubes which contain Mercury. These tubes are classified as universal waste and must be removed prior to demolition. In addition, the building has existing HVAC, window A/C units, etc. present which may contain coolants which must be removed prior to demolition of the building. The Contractor is responsible for identification of, and removal of all hazardous materials prior to demolition of the building per Federal, State and local regulations. This specification section is provided to assist the Contractor in completing those requirements.

POLYCHLORINATED BIPHENYLS (PCB's) LIGHT BALLAST HANDLING PROCEDURES

Demolition of the building included in this project will require removal of light fixtures which contain light ballasts. These light ballasts typically contain PCBs in the oil used as coolant and lubricant. Any ballast containing PCBs is to be considered a "Hazardous Waste", and the Contractor is responsible for ensuring personnel who perform PCB related work (inspection, removal, clean-up) are trained and qualified to do so. All workers must also follow current OSHA regulations including 29 CFR 1910.120 and 8 CCR 5192, as well as other applicable federal, state and local laws and regulations.

PCB Light Ballasts

All light ballasts manufactured through 1978 are magnetic ballasts which contain PCBs. Installation of ballasts manufactured prior to 1978 continued for several more years. As a result it can be expected that any building constructed before 1980 which has not had a complete lighting retrofit is likely to have PCB containing ballasts. The South Annex Building did go through an extensive light retrofit project resulting in the replacement of most if not all existing light fixtures which may have ballasts present. As a result, it is expected most if not all ballasts are now electronic (this type is PCB free) or the manufacturers label on the ballast states "No PCBs". However, it is possible some light ballasts on this site contain PCB's, and must therefore be handled as a hazardous waste by the Contractor. The Contractor may have other options for disposal of any light ballasts found not to contain PCB's.

Light Ballast Inspection

Contractor shall inspect each ballast prior to its removal to determine if the ballast is leaking, if oily residue is present on the exterior of the ballast or the ballast has been damaged resulting in a leak. Upon discovering and prior to removal of any oil coated, leaking, or damaged ballast Contractor shall contact Owners representative to discuss work procedures, waste requirements, etc.

Handling Work Practices of Undamaged Light Ballasts

Handling of ballasts shall be consistent with existing ballast conditions. While a ballast may not initially indicate any damage or leakage to be present, it may become damaged or begin to leak for any number of reasons during the removal and handling process. Any skin contact will probably constitute overexposure to PCBs since they are easily absorbed through the skin. It is recommended any personnel who will perform PCB related work should at a minimum wear protective clothing, including chemically-resistant gloves, goggles, boots, and disposable coveralls.

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Handling Work Practices of Damaged Light Ballasts

Handling of damaged ballasts shall be performed in a manner consistent with existing and current federal, state and local laws and regulations. Clean-up of spills, or contaminated surfaces will require the use of specifically trained and properly protected personnel utilizing state of the art work practices, removal equipment, and materials. The Owners representative must be notified prior to the performance of this type of work.

PCB Containing Waste

All PCB containing light ballasts, removed by the Contractor, shall be placed in leak tight approved containers (metal barrels) until they are removed from the site by a waste transporter permitted to haul hazardous materials. Barrels must not be loaded in excess of their approved capacity. For most barrels this is 750 pounds. No other materials except, a sufficient amount of absorbent packing material, shall be included with the light ballasts.

The Contractor should contact their waste hauler prior to the start of work for information pertaining to recommendations or the waste haulers stated requirements for packing PCB containing ballasts. However, at a minimum, the absorbent packing material should be added to the bottom of the waste barrel prior to the first ballast. Absorbent packing material should then be added intermittently as necessary to encase the ballasts as the waste barrel is being filled. When the waste barrel is filled, or no more light ballasts will be added, additional absorbent packing material should be added to completely cover the ballasts and the container then sealed.

Contractor is also responsible for appropriate labeling of waste barrels and securing of lids to meet federal and/or state requirements while being stored on the site.

All leaking or damaged ballasts must be handled in accordance with federal and state disposal requirements and shall be separated from undamaged ballasts in preparation for incineration at an appropriately licensed facility.

The Contractor is responsible for all costs associated with the removal, packing, loading, shipping, and disposal of each barrel of waste generated during this project. The Contractor is also responsible for obtaining and properly completing any Uniform Hazardous Waste Manifests needed for the disposal of PCB waste. However, the Contractor **SHALL NOT** sign any Uniform Hazardous Waste Manifests for the Owner.

Non-PCB Light Ballasts

Non-PCB light ballasts are considered a hazardous waste in California and the contractor is responsible for collection, packaging, labeling, and holding this waste stream for proper disposal. Non-PCB light ballasts shall be shipped for disposal or recycle by the Contractor.

UNIVERSAL WASTE LAMP HANDLING PROCEDURES

The Contractor shall remove light fixtures which contain lamps which are designated as "Universal Waste" during demolition/renovation activities specified in the contract documents. Contractor is instructed to remove such fixtures using the following handling procedures.

Universal Wastes

Universal wastes are hazardous wastes that are more common and pose a lower risk to people and the environment than other hazardous wastes. Federal and State regulations identify universal wastes. The regulations, called the "Universal Waste Rule," are in the California Code of Regulations (CCR), title 22, division 4.5, chapter 23.

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Universal Waste Lamps

Universal Waste Lamp, also referred to as "lamp" is defined as the bulb or tube portion of an electric lighting device. A lamp is specifically designed to produce radiant energy, most often in the ultraviolet, visible, and infra-red regions of the electromagnetic spectrum. Examples of common universal waste electric lamps include, but are not limited to, fluorescent, high intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps. Any lamp which is not spent and has been designated to be reused is not classified as a waste and does not meet the requirements of a hazardous waste or a universal waste.

Mercury-added lamps

Mercury-added lamps (effective February 9, 2004): Fluorescent tubes and several other types of lamps (not incandescent light bulbs) contain a small amount of mercury that is necessary for their operation. Currently, most fluorescent lamps contain enough mercury to be a hazardous waste.

Universal Waste Lamp Disposal

Spent lamps typically contain concentrations of mercury exceeding the established Total Threshold Limit Concentration and/or the Soluble Threshold Limit Concentration values. Therefore, these lamps must be sent to an authorized recycle facility, or to a universal waste consolidator for shipment to an authorized recycling facility.

At a minimum the lamps must be packaged in boxes/packages/containers which are structurally sound, adequate to prevent breakage, and compatible with the content of the lamps. These packages must remain closed and be free of damage which could cause leakage under reasonably foreseeable conditions.

Each container shall be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)." or "Used Lamp(s)".

Documentation in the form of a log, invoice, manifest, bill of lading or other shipping document is required to be submitted to the Owner's Representative for each shipment of waste from the project site. This documentation shall include: name and address of generator and address of site waste is generated on, quantity of lamps to be shipped, date of shipment, name and address of hauler, and name and address of waste facility receiving the waste.

Hazardous Waste Designation

Any lamp which is not designated for recycling or continued use in a different fixture for which the lamp is manufactured for use in must be handled, managed, and disposed of as a hazardous waste in accordance with Cal/EPA Title 22. Since all spent lamps are required to be recycled the Owner will not approve of the disposal of lamps as hazardous without consultation and review of the specific circumstances which warrant this change in designation.

MERCURY SWITCHES

Thermostat switches that contain mercury are considered a hazardous waste if present within the building they must be removed and disposed. If present and removed the contractor shall follow all requirements for packaging and disposal of these mercury containing wastes.

SMOKE DETECTORS WHICH MAY CONTAIN A RADIOACTIVE ELEMENT

The Contractor shall be responsible for the removal of any and all smoke detectors which may contain a

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radioactive element, which may be present in any building or corridor prior to the demolition of the building included in this project. These types of detectors are easily identified by reviewing the label which is usually found on the back of the detector. Older units may display the international radiation symbol (three bladed propeller) and the radioactive content. Newer units state the radioactive content and their Nuclear Regulatory Agency (NRC) license number.

The Contractor shall be responsible for contacting the manufacturer of any smoke detector with a radioactive element present to determine their return policies. The California Department of Toxic Substance Control (DTSC) has stated that it is a condition of the manufacturers NRC license that they must accept returned units for disposal. The Contractor shall be responsible for all costs associated with removing, packaging, and shipping of the detectors in compliance with the manufacturers policies and procedures.

Contractor shall submit to the Owner a letter from the manufacturer which includes the number of units received, date received, and acceptance of the shipment for disposal by that manufacturer.

Additional Waste Management Requirements

The Contractor is responsible for managing lamps in a manner which prevents release of any universal waste or component of a universal waste to the environment. The Contractor is also responsible for the immediate clean up of materials (mercury or other hazardous constituents) released by a lamp broken during removal or otherwise damaged while being handled into a container or containers designed to accommodate the resulting waste and its contents.

The Contractor is responsible for training employees in proper handling, packaging, storing and labeling the universal waste, as well as, how to respond to releases (66273.13). This may be accomplished by providing employees written instructions or posting these instructions in the area where the universal waste lamps are being stored.

The Contractor is responsible for all costs associated with the removal, packing, loading, shipping, clean up and disposal of hazardous materials removed during this project, and any waste generated due to breakage during this project. The Contractor is also responsible for obtaining and properly completing any Uniform Hazardous Waste Manifests needed for the disposal of lamp waste. However, the Contractor **SHALL NOT** sign any Uniform Hazardous Waste Manifests for the Owner.

It **SHALL** be the responsibility of the Contractor to contact the Owner in advance of the scheduled pick up time and date so the waste materials can be visually inspected for proper packing, and to have the Uniform Hazardous Waste Manifest properly signed by a Owner representative.

FREON

All systems containing Freon and other fluorocarbon products associated with heating, ventilating, and air-conditioning (HVAC) systems, etc. shall be removed from the mechanical systems and recycled in accordance with Cal/EPA requirements prior to demolition of the building included in this project.

Prepared By:

Douglas R. Colley, Project Manager Entek Consulting Group, Inc. December 30, 2011

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