

**Waste Stream Management Plan
Energy Retrofit Projects
Cobb County, Georgia
DE-EE0000803**

I. Background and Overview

Project: Cobb County Energy Efficiency Building Retrofits

Designated Project Coordinators: Cobb County Property Management Department, Cobb County Sheriff's Department, and Cobb County Parks and Recreation Department

This plan covers actions associated with the energy efficiency retrofit implementation to public facilities owned and operated by Cobb County, Georgia (County). Cobb County's energy retrofit projects were detailed in the County's EECBG application, and include projects for retrofitting lighting and HVAC systems in existing County facilities. The County will perform work using a combination of in-house staff and contractors. Compliance with this plan will be required from both County staff and contractors.

Specific actions the County and its contractors will perform include replacement of fluorescent lighting fixtures, lamps and ballasts, and HVAC systems replacement. The replacement of equipment should not require the disturbance of any hazardous materials excepting lighting products (trace mercury in fluorescent lamps, and some number of ballasts containing PCBs). However, this plan provides guidance on the handling of these materials, including asbestos, if discovered during site investigations or subsequent work.

Cobb County will require documentation for the handling, recycling and/or disposal of all materials. The County will retain all records regarding compliance with this plan. Records will include those initially collected and compiled by any contractors, as well as documentation of actions performed by County staff.

In addition to the specific actions specified above, the County and its contractors may also perform replacement or upgrades of building components collectively called "weatherization" items. These may include roofs, windows, doors, and roof and building insulation and infiltration remediation (weather stripping, etc.).

II. Waste Specific Disposal Processes

A. Lighting Retrofits

Recycling Contractors

Cobb County plans to use the following lighting products recycler for all fluorescent and HID lamps, and ballasts:

Southeast Recycling Tech, Inc.
2260 Moon Station Court, Suite 140, Building. 200
Kennesaw, GA 30144
Phone: 770-426-5000

Cobb County plans to use the following firm for the recycling of metals:

Marietta Recycling Corp.
311 Marble Mill Road
Marietta, GA 30060
770-425-6600

Procedures

- All ballasts and universal waste lamps (fluorescent and HID) will be source separated – e.g. collected in separate, material specific containers as they are generated on the job-site. The separated materials are hauled directly by a recycling contractor to their appropriate recycling and transfer station for processing.
- Universal Waste Lamps: The recycling contractor shall recycle discarded fluorescent and HID lamps to recover and recycle lamp components, including metals, glass, and phosphors. Mercury and lead will be recovered and recycled.
- Lighting ballasts: Ballasts will be divided into two recycling streams:
- Ballasts clearly identified as non-PCB: Where ballasts can be clearly identified on site as being PCB free, they will be separately collected for pickup by the recycling contractor who will disassemble and recycle the materials.
- Where ballasts are identified as containing PCB's or where they cannot be clearly determined to be PCB free, ballasts will be separately collected for pickup by the recycling contractor who will disassemble the ballasts, recycle non-contaminated components, and transfer contaminated components to an approved hazardous waste disposal site.
- Fixtures: As ballasts and lamps are removed, fixtures shall be collected on site for delivery to the designated metals recycling contractor for recycling.
- Misc. Waste: Non-recyclable waste, if any, shall be placed in building trash receptacles for delivery to a local landfill.
- Work Processes: Should any universal waste lamp break (new or used) during handling, work shall cease until the site can be cleaned and the product debris removed from the work location to a suitable container.
- Documentation: The lighting recycling contractor shall provide the County with documentation of the type and quantity of materials collected and a statement of disposition and compliance with this plan and all appropriate state and federal regulations. Such records will be retained by the County.

B. HVAC Equipment Retrofits

Recycling Contractor

Cobb County plans to use the following HVAC products recycler for all HVAC equipment removed from our properties. This contractor will handle all metals from the equipment, and will recover all refrigerants and lubricants for recycling where present.

Marietta Recycling Corp.
311 Marble Mill Road
Marietta, GA 30060
770-425-6600

Procedures

- *Evacuation of Refrigerant Gases and Lubricants from Existing Equipment:* The retrofit contractor shall make a determination regarding the best method for either retention or evacuation of refrigerant gases, and/or lubricants from equipment to be removed.
 - Where possible, the gases and lubricants will be retained in the equipment during removal and transport to an off-site recycling location.
 - Where this process is not deemed to be sufficient to protect against accidental releases during disassembly and transport, refrigerants and lubricants shall be recovered on-site, using approved recovery methods.
- *Recycling of Refrigerant Gases and Lubricants:* All refrigerant gases and lubricants, whether collected on site or off site, shall be recycled at an approved recycling center.
- *HVAC Equipment:* All used HVAC equipment will be delivered to our designated equipment recycling contractor.
- *Other Recyclable Building Waste:* Where recyclable metals are deemed waste during and following demolition and construction (ductwork, wiring, etc.), such materials will be aggregated on site and transported to a local metals recycling facility.
- *Non-Recyclable Waste:* All other non-recyclable and non-hazardous construction waste (fiberglass, etc.) will be collected on site and disposed of in accordance with procedures in Section II-C below for non-recyclable wastes.
- *Hazardous Waste:* Should County personnel or any contractor discover materials suspected of containing hazardous materials (HAZMAT), all work at the site that would disturb such materials will be halted. A HAZMAT testing firm licensed by the Georgia Environmental Protection Division (EDP) will be engaged to perform testing in compliance with the U.S. Environmental Protection Agency (EPA) testing guidance and procedures, using a NVLAP laboratory. Should materials be discovered that are not in compliance with EPA or EPD rules, a remediation contractor licensed by EPD will be engaged to develop a remediation plan compliant with all state and federal regulations and procedures, including notification to EPD in accordance with state regulation.

The County will rely on our licensed testing and remediation contractor(s) to develop and implement specific testing, notification, and abatement plans compliant with all applicable EPA, EPD, and OSHA statutes and procedures. In Georgia, EPD is charged with oversight and enforcement of activities involving hazardous materials. The governing statutes are the Georgia Hazardous Waste Management Act, O.C.G.A. 12-8-60, and Georgia EPD rule 391-3-11 "Hazardous Waste Management", both of which can be viewed at http://www.gaepd.org/Documents/index_haz.html. EDP licensed testing and remediation firms and landfill operators, as well as local NVLAP laboratories, can all be found at http://www.gaepd.org/Documents/regcomm_lpb.html#aa.

Any HAZMAT removed from the site by our licensed contractor will be delivered to a HAZMAT level 1 landfill licensed by the EPD for receipt of the specific material(s). The Eagle Point landfill can be used (see section II-C below). Documentation of all testing procedures and results, remediation, transport and disposal as required to comply with EPD regulations and/or to fully document these activities will be required of all contractors and will be retained by the county.

As it is anticipated that asbestos will be the sole HAZMAT anticipated, the following rules and procedures will be required of our testing and remediation contractors as they deem applicable to the materials and conditions found at specific sites.

- EPA's National Emission Standard for Hazardous Air Pollutants (NESAHP)
 - 40 CFR Part 763, "Asbestos Hazard Emergency Response Act" (AHERA)
 - EPA's "Guidance for Controlling Asbestos-Containing Materials in Buildings"
 - EPA asbestos testing procedures conforming to EPA Method 600/R-93/116
 - Additional testing if required conforming to the EPA 400 Point Count method
 - Testing methods appropriate to ensure compliance with OSHA Permissible Exposure Limits
- *Documentation:* All construction and recycling contractors shall provide the Owner with documentation of the type and quantity of materials collected and a statement of disposition and compliance with this plan and all appropriate state and federal regulations. Such records will be retained by the Owner.

C. Non-recyclable Waste and Asbestos

- *Contractors:* Cobb County will use one of two contractors for non-recyclable, non-hazardous construction debris.

For small volumes, Waste Management Corp. currently provides trash disposal services for County facilities at each site, utilizing the following landfill:

Pinebluff Landfill
13809 East Cherokee Drive
Ball Ground, GA 30107-4657
(770) 479-2936

Advanced Disposal Services (ADS) will be used for disposal of large volumes of non-recyclable construction waste for all the project locations. ADS provides on-site collection and transfer, or products can be delivered to their transfer station in Cobb County, listed here.

ADS Transfer Station

1897 County Services Parkway
Marietta, GA 30008.

Their landfill, which has a “20-year expectancy,” is:

Eagle Point Landfill

8880 Old Federal Road
Ball Ground, GA 30107
678-341-7140

Hazardous Waste –Asbestos: The **Eagle Point Landfill** is licensed by the Ga. EPD to accept asbestos. Should this become necessary, a hazardous waste transporter in compliance with 40 C.F.R. Part 263 (2007), as required by EPD, will be used (see section II-B “Hazardous Waste”).

- *Documentation*: All contractors shall provide the County with documentation of the type and quantity of materials collected and a statement of disposition and compliance with this plan and all appropriate state and federal regulations. Such records will be retained by the County. The sole exception will be County-generated waste that is disposed of in on-site trash containers.

D. Weatherization Retrofits

- *Re-Use*: Where possible, Cobb County will retain, either on site or at other County owned facilities, any reusable materials. This is anticipated to be limited to ballast rock from roof assemblies that are replaced. In addition, where it is determined to be good engineering practice, existing building components may be left in place and new components added to complement the existing components. This is expected to be limited to roofing with new roofing and insulation added over structurally sound existing roofing.
- *Recyclable, non-recyclable, and hazardous waste handling and disposal*: Refer to specific direction for handling these categories of waste in Section II-B and II-C of Cobb County’s WSMP. These sections specify procedures for the determination, handling, and remediation of all classes of waste, and identify approved disposal methods and sites for each category of waste.
- *Documentation and Communications*: All weatherization projects undertaken using EECBG funding shall adhere to the procedures, responsibilities and guidelines in Sections II-C and III of Cobb County’s WSMP.

III. Communication Plan:

- All bids and contracts shall include the written provisions and requirements for compliance with this plan. All contractors and subcontractors will be required to ensure all their crews comply with the Waste Management Plan.
- Prior to beginning work, all contractors and subcontractors shall identify recycling and disposal resources they will use, if different from those identified herein, with such resources subject to County approval.
- All County employees performing work described in this plan shall be familiarized with plan provisions, and project managers shall be accountable for compliance.
- Waste prevention and recycling activities will be discussed at the project kickoff meeting with each contractor and subcontractor, or, in the case of work performed by the County, with assigned County staff prior to commencement of work.
- All recycling containers will be clearly labeled.
- All Contractors, subcontractors, and County project managers will provide monthly reporting as necessary to document compliance with this plan.