

EXHIBIT G
Sunnyvale SMaRT Station
Hazardous Waste Exclusion Program

SMaRT Station Profile

The SMaRT Station is a materials recovery facility designed to serve the cities of Sunnyvale, Palo Alto, and Mountain View, all of which are located on the southwestern portion of the San Francisco Bay within Santa Clara County. The City of Sunnyvale, where the facility will be located, has a population of 117,000 with a strong manufacturing base. The Cities of Palo Alto and Mountain View are located north of Sunnyvale as shown in figure A-1.

Program Goal

The Hazardous Waste Exclusion Program for the Sunnyvale SMaRT Station is designed to detect and remove hazardous and other prohibited materials from solid waste entering the facility, thereby helping to protect the environment and the public from immediate and future health risks. The program will educate users of the SMaRT Station and the public about the proper disposal of prohibited materials.

Prohibited Materials

The SMaRT Station is prohibited from accepting hazardous wastes and other designed wastes, such as liquid wastes. These wastes are prohibited because they possess flammable, combustible, toxic, corrosive, and/or reactive characteristics.

A representative list of prohibited material categories is presented in Attachment A. While the list is not exhaustive, it contains many of the unacceptable products commonly encountered at sanitary landfills, transfer stations and material recovery facilities.

Public Information

Public information about the program will be distributed using two sources. The first will be through garbage bills and the second will be through information distributed at the SMaRT Station to its' users. This information will explain the purpose of the program and how it works, list prohibited materials, and how to properly dispose of them.

Signs at the SMaRT Station will also be used to warn users that hazardous and other prohibited materials are not accepted. Figure A-2 is an example of the sign that will be posted at the entrance of the station.

Users will be notified that they retain responsibility for any hazardous or other prohibited materials detected in their loads.

Load Checking Procedure

All handling, storage, and disposal of hazardous wastes will be in conformance with the California Code of regulations Title 22, Chapter 12, Section 6626.10, et al. The load checking program includes the routine questioning of drivers, random inspection of vehicle loads, and inspection of suspicious loads. Under this program, drivers will be questioned about the contents of their load as they enter the facility and during the load check. The list of questions which will be asked of each driver appears in Attachment B.

Random inspections will be performed on a variety of different vehicle types that enter the facility. Checks will also be performed on those vehicles which are more likely to contain prohibited materials, based on past experience, waste source, or suspicious behavior of the driver. A minimum of six formal load checks will be performed each week using the protocol described in Exhibit V. Two of the six vehicles will be of those transporting commercial waste, two will be of vehicles transporting industrial waste and one vehicle each of residential waste and publicly hauled waste. If staffing and the work level all, the frequency of inspections will be increased.

Vehicle load inspections will be performed uniformly, whether the inspection is random or at the discretion of the toll collector. The inspection will be performed using the following procedure:

1. Explain to the driver that an inspection of the load will be required to determine if prohibited materials are present.
2. If the driver refuses, let him or her know that the solid waste cannot be dumped at the SMaRT Station unless he/she cooperates with the load checking program. If the driver chooses to leave, the vehicle license plate number and company name will be recorded in the log book.
3. The driver will be asked to dump the load into a window at a designated tipping area where the inspection will be performed. The load checking area will be separated from the regular tipping area.
4. The inspection will entail sifting through the waste with a rake or other handheld tools looking for the products contained in Attachment A. Two samples from the load will then be taken using the protocol described in Exhibit V. The vehicle type, material found in the load, and the name of the person performing the inspection will be recorded on the load checking data sheet in Attachment C.
5. If no prohibited materials are found, the driver will be thanked for his or her cooperation and allowed to leave.

Entrance Sign

NO HAZARDOUS WASTES ACCEPTED AT THIS FACILITY

HAZARDOUS WASTE INCLUDE:

PAINTS-SOLVENTS-PESTICIDES-ACID & CAUSTIC SOLUTIONS-GASOLINE
EXPLOSIVES-PHOTOGRAPHIC & POOL CHEMICALS-COMPRESSED GAS,
CYLINDERS-INK-PHARMACEUTICALS-RADIOACTIVES & INFECTIOUS WASTE

ASK BEFORE YOU DUMP

COMPANY NAME

ALL LOADS SUBJECT TO INSPECTION FOR PROHIBITED WASTES

WE THANK YOU

White Backgr

4" Red

1 1/2" Black

1" Black

2" Red

1 1/2" Black

4" Black

2" Black

46"

36"

Handwritten signatures and initials

6. If any prohibited material is identified during the load check, the driver will be informed that the materials will not be accepted at the SMaRT Station, that the materials must be removed from the facility, and that arrangements for the proper disposal must be made.
7. If prohibited materials are found, the inspector will, at a minimum, record the individual's name, license plate number, company name (if applicable) and type of waste found, in the log book. If the material is suspected to possess an immediate danger to employees, its' users or the facility, the Public Safety Department's hazardous material response units and the Santa Clara County's Office of Environmental Health will be notified of the situation immediately.
8. Hazardous materials and other prohibited materials found during load checking will be returned to the driver for removal from the site, or moved to the hazardous materials storage area. This decision will be made by the onsite supervisor.
9. After the load has been checked, the driver will be given a slip that has been signed by the inspector which must be returned to the toll booth.
10. In the event that an excessive amount of prohibited material is found in the load, or if the same user or generator has made repeated attempts to dispose of prohibited materials, the operator will notify the proper regulatory agencies about the incident(s). More stringent measures, such as civil or criminal penalties, will be pursued at the discretion of the City of Sunnyvale and/or Station Operator.
11. A log for the load check program will be retained onsite for 18 months.

Equipment operators will also be trained to recognize possible illegal waste containers and push them to an area out of the disposal traffic pattern for further examination. Other employees who work in and around the public disposal area will be trained to recognize possible illegal waste containers and notify the load check team so that an inspection can be made. If any of the personnel observe unacceptable waste being unloaded, they will be trained to halt the unloading and summon the load check team for inspection of the load.

Storage of Prohibited Materials

The SMaRT Station is equipped with a hazardous material storage area which will be used for the temporary storage of prohibited materials recovered during the load check program. Caution will be used to make sure incompatible materials are not mixed together or stored next to each other. The storage area will be fenced and will be locked at all times unless an authorized SMaRT Station employee is present. Containers that will be used to store hazardous material will have secondary containment, security, ventilation, and fire resistant construction. Incompatible waste will be segregated and separated storage partitions that are divided by double metal walls. This will prevent

acids, bases, and flammable from coming in contact with each other. Containers will have a flammable bay where a fire extinguisher will be kept.

Materials that are not removed by the user or generator, or are abandoned by the unknown generator, will be removed from the Station by a hazardous waste hauling firm retained by the operator to collect, transport and dispose of all prohibited material.

Hazardous materials collected by the SMaRT Station will be stored on the property for no longer than 90 days.

Employee Training

All SMaRT Station employees will be required to attend a training program that teaches them how to detect, recognize and handle hazardous and other prohibited materials. The program will also teach them about emergency procedures, how to use equipment safely, and how to use the SMaRT Station's communication system. All employees will attend an annual review of the training program.

The load checking program will be performed by SMaRT Station employees that have taken and passed a 40-hour CAL-OSHA hazardous material training course. The program teaches them how to recognize and handle hazardous material.

SMaRT Station Record Keeping

The toll collector will maintain a log book onsite to record all persons, companies, and vehicles that are found to bring hazardous, or other prohibited materials into the SMaRT Station. The license plate number, name, and company name of drivers who refuse to undergo load checking will also be recorded in the log book.

The information in the log book will be compiled into two lists that will be updated quarterly. The first will alphabetically list the names of all the individuals and companies that either refused to undergo a load check or were carrying hazardous or other prohibited materials. The second list will contain the license plate numbers in numerical sequence of vehicles whose drivers either refused to undergo a load check or were carrying hazardous or other prohibited waste. These lists will be useful tools for identifying repeat violators and enforcing the Hazardous Waste Exclusion Program. The report will also include information regarding the amount and type of hazardous material that was collected and rejected at the facility. Copies of this information will be kept onsite and will be sent to the Local Enforcement Agency for their records.

Records of employee training for hazardous material handling will also be retained at the SMaRT Station.

Protective Equipment

Employees that perform load checks will wear protective clothing including Tyvek suits, orange safety vests, hard hats, gloves, protective goggles, respirators, and boots. After each load check Tyvek suits will be disposed and all other equipment will be cleaned.

The facility will keep mitigation equipment, such as brooms, shovels, and absorbent, onsite for use of an emergency.

Emergency Plan with Government Agencies

A map of the SMaRT Station will be issued to the Sunnyvale Public Safety Department. The map will indicate where the hazardous material storage area is located, all roads to and inside the facility, and possible evacuation routes. The SMaRT Station will also have a map to the nearest hospital posted at the toll booth for use in the event of an emergency. An emergency evacuation plan for the facility will be modeled after the emergency evacuation plan that is being developed by the Sunnyvale Water Pollution Control Plant, which is located on the adjacent site. The emergency plan being developed for the Sunnyvale Water Pollution Control Plant is to guard against a possible leak of chlorine gas.

The SMaRT Station's emergency evacuation plan will be added as an addendum to this report when it is finalized.

Program Review

Load check records and operating experience will be reviewed quarterly for two quarters, then semi-annually for one year, and annually thereafter. This review will focus on the following areas:

- * Is the program working? Is less hazardous or designated material being found over time?
- * Is the program being implemented in a safe manner?
- * Do drivers tend to cooperate, and if no, why not?
- * Have any behavior patterns emerged that could be used to improve the program? For example, do drivers who answer "no" to all questions tend to be carrying hazardous or other prohibited materials more often than those who answer "yes"? These reviews will result in specific recommendations for changes in the program.
- * Is more public education about the program needed?
- * What types of waste are most commonly detected?
- * What types of loads most commonly carry hazardous waste?
- * How much waste is being rejected and what is the cost per ton of rejected waste?

Attachment A
Generic Product Categories Potentially Containing Hazardous Waste

<u>Product</u>	<u>Potential Hazardous Constituent</u>
Paints and Allied Products	
Solvent-based paints	Solvents, heavy metals
Oil-based paints	Heavy metals
(Dried water-based paints are acceptable)	
Thinner	Solvents
Paint recoverers	Solvents
Pesticides	Solvents & toxic hydrocarbons
Insecticides	
Fungicides	
Rodenticides	
Herbicides	
Molluscicides	
Automotive Products	
Batteries	Heavy metals, acids
Coolant	Ethylene glycol
Lubricating oils	Solvents, heavy metals
Degreasers	Solvents
Household Cleaners and polishes	
Cleaners	Solvents, acids, bases
Drain openers	Solvents, acids, bases
Detergents	Solvents, bases
Polishes, waxes	Solvents, acids
Glues and Solvents	
Glue	Solvents
Solvents	Solvents
Treated Wood	Pentachlorophenol, dioxins
Demolition Debris	
Floor tile, linoleum	Asbestos
Roofing materials	Asbestos
Ripe/duct insulation	Asbestos
Ceiling tiles	Asbestos
Excavated Soils	Solvents, fuel oils Pesticides, some metals

Attachment B
Hazardous Waste Exclusion Program Questions

If a "yes" response is received to any of the following questions, the toll collector or inspector must determine the source of the load.

- 1) Are you carrying any paint, thinners, or solvents?
- 2) Are you carrying any automotive waste oils, coolant fluid, or batteries?
- 3) Are you carrying any household cleaners, polishes or waxes?
- 4) Are you carrying any pesticides, e.g. snail or slug bait, rat killer, insecticides or fungicides?
- 5) Are you carrying any treated wood or contaminated soil?
- 6) Are you carrying any floor tiles, pip/duct insulation, ceiling tiles, or roofing materials?
- 7) Are you carrying any medical waste? Any red bag wastes? Any dead animals?

Attachment C
SMaRT Station Hazardous Waste Exclusion Program

Date: _____ **Sheet Control Number :** _____

Type Of Vehicle: _____ **Vehicle License Plate # :** _____

Drivers Name : _____ **Drivers License # :** _____

Transport Company : _____

Source(s) or Origin of Load : _____

Description of Material Checked

Prohibited Materials Found

Course of Action Taken

Inspector's Signature and ID#