10.60 DISPOSAL OF CONSTRUCTION WASTES

10.61 DEMOLITION WASTE, CLEARING & GRUBBING

"Construction and demolition waste" means waste building materials including wood, metals, and rubble which result from construction or demolition of structures. Such wastes shall also include trees. Refer to *Construction Manual Chapter 6* for discussion about disposal of clearing and grubbing wastes.

Demolition Notice

Iowa DNR and U.S. EPA require a "Notice of Demolition" to be filed with them 14 calendar days prior to starting work. The Office of Location and Environment will prepare and submit these notifications as requested by project engineers. Contact Brad Azeltine (515-239-1938). Notifications do not happen automatically; project engineers must make a request.

To allow time for internal communication and processing, the specifications require the contractor to identify a start date and expected duration at least 25 calendar days prior to starting demolition. Project engineers then have 7 calendar days to provide this information to the Office of Location and Environment. Once notification is made to Ames, requests will typically take 1 to 2 working days to process and mail.

Note:

- Requests for demolition notifications shall include:
  Contractor Information - Name, mailing address, telephone number, contact person, and contractor's start date
  Project Information - Project number, listing of each parcel to be demolished, and estimated completion date (allow for rain days and delays)
  Parcel Information (for each parcel) - Parcel number, mailing address, list and description of buildings, approximate age of buildings, number of floors (2 story house), approximate building size (X m^2 [ft^2]), present/prior use
  Bridge information (when applicable) – Bridge maintenance number and location description (e.g. US Hwy 34 bridge over Sugar Creek 0.4 Mi. E. of Ottumwa)
  Most information should be available from the contractor, demolition plans, and contract documents in the project file.
- Project engineers will receive a file copy of notices submitted for their projects. It is recommended to check with the Office of Location and Environment if this copy is not received within a week of submitting the original request. Returning notices by fax will not be routine, however, in special situations project engineers may so request.
- Be careful when change ordering additional demolition. Regulatory notifications are parcel specific, not project general. If an additional parcel is added by Extra Work Order, another 14 calendar day regulatory notification is required.
- A Notice for Demolition is required before removing buildings and structures, including bridge projects involving the complete removal of the structure. It is acceptable to allow a contractor to start removal of miscellaneous items on a demolition contract at any time. (For example: remove fencing, sidewalks, driveways, septic tanks, clearing and grubbing, junk, etc.) A contractor cannot demolish a building without Iowa DOT having made notice to Iowa DNR.

  U.S. EPA has advised the Iowa DOT that the following <u>are not</u> considered to be regulated buildings and therefore <u>do not</u> require advance notice of demolition: outhouses, dog houses, garden sheds, pump houses, storm/root cellars, and similar appurtenances. Examples of buildings which are regulated and which do require advance notice of demolition include houses (including basements and foundations),

garages, barns, machine sheds, corn cribs, grain bins, hog houses, & chicken coops.

- Changes to the original notification. Note: All times and days noted below include no allowance for transmittals and communication lags between the field and Ames. (If something below says 14 days, it means 14 days from the time the Office of Location and Environment processes the paperwork, not 14 days from the time a project engineer or the contractor decide to request a change.) Project engineers need to decide what time allowance is appropriate for their situation.
    1. Delaying a notice's start date requires amending the original notice to Iowa DNR. Delaying a start date can be made anytime up to the original start date. After that time a new notice must be processed which means the 14 calendar day delay starts over. Project engineers are responsible to provide information about delays to the Office of Location and Environment for processing.
    2. Extending the notice's completion date by more than 1 or 2 calendar days requires amending the original notice to Iowa DNR. Project engineers are responsible to provide information about extensions to the Office of Location and Environment for processing.
    3. Starting earlier than a notice's start date shall not be allowed except for the following circumstance. Assume a contractor has provided a start date more than 25 days in advance as required in the specifications. A notice of demolition is processed. Now the contractor wants to start earlier than originally planned. Moving up a start date can be accomplished if at least 14 calendar days are available from the time the new request is made to the new start date.

       This situation identifies the need for timely handling of requests from the project engineer to Ames. It is always better to process a notification identifying more than the minimum 14 calendar day requirement.

The Office of Location and Environment maintains a database on DOTNET that tracks the status of demolition notifications.

Demolition by Burning

Burning of buildings or structures shall not be allowed, as per Iowa DNR regulations. This is a specification change from past practice where we allowed local fire departments to conduct a training fire. The Office of Right-of-Way does have a procedure that allows fire departments perform training fires. This includes a standardized written agreement, and current policy is to have the training fire performed prior to the parcel being turned over to the Office of Contracts for a demolition letting.

Note: Burning of clearing and grubbing residue is still allowable. Refer to *Construction Manual Chapter 6* for more details.

Septic Tanks and Privies

It is not uncommon to have an item on a demolition contract that requires closing of a septic tank system. Since septic tank systems come in various styles, configurations, and construction materials, it is difficult to address their closure in other than general terms. The recommended method for closing a septic tank system:

- All contents and sludge shall be removed and hauled to a municipal wastewater treatment facility. *Chapter 68 of Part 567, Iowa Administrative Code* requires that commercial cleaning of a septic tank shall be accomplished by a licensed individual or company and removed material shall be taken to a facility which treats such material.
- Tanks shall be removed and disposed of by the contractor. Note: It is not required that a contractor remove the leach field tile.
- All lateral lines (in flow and out flow) shall be plugged at the tank.

Closing of privies (outhouses) is not specifically addressed by specifications because it was felt the frequency of encountering one was almost nil and costs associated with such closure would be minimal. If a privy is present on a demolition contract:

- Remove the building
- Have the contractor spread a 22.7 kg (50 pound) bag of "sweet" lime on the fecal sludge.
- Backfill the hole with any suitable backfill material or sand.

10.62 ASBESTOS

Background

Asbestos is the name for a group of natural minerals that separate into strong, fine fibers. The fibers are heat-resistant and extremely durable. There are a number of different types of asbestos including Chrysotile, Amosite, Crocidolite, Anthophylite, Actinolite, and Tremolite. The typical size of asbestos fibers is from 0.1 to 10 micrometers. This makes them usually invisible to the human eye. Because of their fine size, they can remain suspended in air for hours when disturbed. This increases the possibility of human exposure via inhalation.

From a regulatory and health standpoint, friable asbestos is of primary concern. Friable asbestos material is defined as any material containing more than one percent asbestos by area which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

Asbestos materials have been used in many building and industrial products. The following products represent the major uses of asbestos in the U.S.:

- Friction Products. Primary brake linings; generally nonfriable.
- Plastic Products. Floor and roofing coverings, cookware; generally nonfriable, but can emit fibers when broken or sawed.
- Cement Pipe and Sheeting. Asbestos-cement pipe and sheeting for roofing and siding; generally nonfriable, but can emit fibers when broken or sawed.
- Paper Products. A wide variety of products such as roofing felt, gaskets, and pipeline wrapping; generally friable.
- Textile Products. Fire-resistant curtains, blankets, protective clothing; when uncoated or torn, can release asbestos fibers.
- Insulation and Decorative Products. Including sprayed or trowelled asbestos coatings, molded or wet-applied pipe coverings, insulation board; highly friable.
- Pipe Insulation. Preformed pipe coverings for thermal insulation on steam pipes; highly friable.
- Insulation on Boilers and Hot Water Heaters. Friable and deteriorates easily.
- Other uses. Exterior shingles, spackle compound, artificial fireplace logs, etc.

Asbestos has been identified on bridges including expansion joint materials, bearing pads and packings, utility conduits, and pipe coatings.

Health Concerns

Medical studies have shown that the primary exposure route for asbestos is through inhalation. The following diseases can result from inhalation of asbestos fibers:

- Asbestosis - A noncancerous respiratory disease that consists of scarring of lung tissue
- Lung Cancer
- Mesothelioma - A rare cancer of the thin membrane lining of the chest and abdomen
- Other Cancers - Some studies have suggested that exposure to asbestos is

responsible for some cancers of internal organs such as esophagus, larynx, stomach, colon, and kidney.

Regulatory Programs

- OSHA controls workplace asbestos exposure *(29 CFR 1910.1001, 1910.134, and 29 CFR 1926.58)*
- EPA controls asbestos through:
  - Clean Air Act - *40 CFR 61, Subpart M*
  - Toxic Substances Control Act - *40 CFR 763*
  - Clean Water Act - *40 CFR 427 and 45 FR 79326*
  - CERCLA - *40 CFR 302* (Reportable quantity is 1 pound)
- U.S. DOT - *49 CFR 171, 172, and 173.216*
- Consumer Product Safety Commission
- Department of Labor's Mine Safety and Health Administration

Asbestos Removal

U.S. EPA regulates the removal of asbestos-containing material from buildings and structures which are being demolished or renovated. EPA regulations for removal, and subsequent disposal, are set forth in *40 CFR 61*. Generally speaking, certain procedures must be followed, including:

- Buildings and structures that are scheduled for renovation or demolition shall be inspected for the presence of asbestos. This includes bridge projects having the potential to encounter asbestos materials. Note: Moving of a building is considered renovation. Therefore, such instances must be investigated.
- Iowa DNR and Iowa Division of Labor shall be notified at least 14 calendar days prior to asbestos abatement activities. For the Iowa DOT, the asbestos services agreement requires the abatement contractor to provide this notification with copy to the project engineer.
- Regulated Asbestos-Containing Material (RACM) must be removed prior to any activities that would disturb the materials or prevent future access to them for removal.
- When RACM has been removed, it must be kept wet, contained in a leak-proof wrapping or bag, and properly labeled for disposal.
- U.S. DOT regulates the transportation of asbestos and identifies it as a hazardous material. Before accepting RACM for transportation, a transporter must ensure that it is properly contained in leak-proof containers, appropriately labeled, and has a waste shipment record properly filled out.
- Because asbestos is essentially immobile in soil, it need not be placed in a hazardous waste landfill. A sanitary landfill is sufficient.

  The Office of Location and Environment maintains a database available for viewing on DOTNET.

Abatement Process

Removal activities will be administered by the Office of Location and Environment. This office has statewide abatement contractors under “time and materials” contracts. Generally the process is outlined in *Appendix 10-12*.

Field Activities

General field contract oversight and coordination will continue to be required for this work. The service contract states that our abatement contractors shall do several things:

- Complete and file abatement notification to Iowa DNR and Iowa Division of Labor. A copy of this notification and proof of delivery shall be provided to the project engineer. A contractor shall not start work before the date specified on the notification form and that date must be at least 14 calendar days after the notice was postmarked, i.e. file

notice....wait 14 calendar days...begin abatement work.

- Notify the project engineer of the contractor's work schedule including start date and anticipated duration of site activities. Note: Start date must be the date stated on the notification. If it is not, an amended notification shall be submitted by the contractor to Iowa DNR and Iowa Division of Labor.
- Provide a final abatement report to the project engineer. This report shall contain copies of waste shipment records, all air monitoring test results, any daily work logs, and a signed copy of the Certification of Completion statement. (Blank form provided in *Appendix 10-13*. In addition, the final report shall contain a parcel-by-parcel inventory of mercury and PCB containing materials removed. Refer to *Construction Manual Section 10.64* for further details.

Since the service contract is written as "time and materials," some field monitoring and oversight will be required. This is envisioned as an occasional site visit to document that the contractor is working, number of individuals working, and how much waste is generated. Note: There is no specific field documentation required, site visits need only be noted in the inspector's daily diary.

Payments will be initiated by the asbestos coordinator in the Office of Location and Environment. When the abatement work is completed:

- The final abatement report needs to be filed in the project engineer's office, by county and parcel number, in a general asbestos file and retained for 3 years.
- The contractor's Certification of Completion statement needs to be initialed by the project engineer (in the space provided) and forwarded to the Office of Location and Environment c/o Asbestos Coordinator. This will be the coordinator's trigger to accept the project and issue final payment.

10.63 PAINT WASTE

Refer to *Construction Manual 10.54* for disposal of paint wastes.

10.64 LIGHT BULBS, THERMOSTATS, & BALLASTS

EPA identifies bulbs and possibly ballasts, transformers, and/or capacitors from the following as regulated waste:

Fluorescent lights	Mercury Vapor lights
High Pressure Sodium lights	Metal Halide lights

Also included in the regulations are heating and cooling thermostats which have mercury thermometers and/or an internal mercury filled switch. Therefore, these items must be removed and disposed of properly before demolishing a building or structure. Removals will be accomplished in one of two ways:

Situation 1 - Parcel has been abated for asbestos.

One portion of our statewide asbestos abatement contract requires the abatement contractor to remove mercury and PCB-containing materials. In this situation, the inspector needs to verify regulated materials have been removed prior to the actual demolition.

Situation 2 - Parcel was initially found to contain no asbestos.

In this situation there will not be an asbestos abatement contract. The project engineer will be responsible to check for mercury and PCB-containing materials and have them removed prior to demolition.

Regulations

A. Bulbs

EPA regulations state that "... mercury-containing lamps ..." and thermostats are to be considered a “universal” waste because of mercury. The bulbs from lights noted above and thermostats with mercury thermometers and/or mercury switches CANNOT be disposed of in a landfill, but are to be sent to a lighting materials reclamation facility or to an out-of-state hazardous waste landfill.

B. Ballasts

Some lights contain ballasts which (inside the metal outer jacket) have oil to facilitate cooling. Cooling oil, at one time, had PCBs as an admixture. Since the early 1980s, PCBs have been banned from use in the U.S. Thus, ballasts are required to be PCB free and to be labeled with a statement saying something like: **Contains no PCBs**. (Refer to *Appendix 10-10, Photographs #7 & 9*.) However, ballasts typically have a long "life" and it will not be uncommon to find pre-1980 ballasts still in service. PCB wastes are regulated by EPA and considered a hazardous waste.
NOTE: EPA waste code for PCB's is *PCB-2*.
REMEMBER: The word ballast as used above, has a broad interpretation. Refer to definitions.

Project Requirements

A. Bulbs

Bulbs from the 4 types of lights noted above shall be:

- removed from the lighting unit.
- packed in a way to prevent breakage during handling, transportation, and storage.
- quantified as to the number of bulbs from each parcel.
- itemized on a field inventory sheet to identify the number(s) and parcel(s) where bulbs came from.
- transported and temporarily stored in a "safe" designated temporary storage area.

NOTE: Bulbs can be packaged together provided there is some positive protection from breakage and the bulbs are identifiable by quantity of bulbs from each parcel. Cardboard boxes (grocery store variety) can be used for smaller bulbs. Obviously, longer fluorescent bulbs will be a problem. One option is to have the reclamation facility provide containers for fluorescent bulbs. (Boxes could be delivered ahead-of-time via our freight trucks.) Another is to have the contractor provide appropriate storage containers. ("Appropriate" could be fiber boxes, fiber barrels, or other container suitable for protecting bulbs from breakage.)

If a bulb breaks during removal or in handling, the broken material shall be cleaned up, placed in a separate secure container, marked as "Broken bulb(s)," and transported with other bulbs to the temporary storage area.

B. Thermostats

Thermostats which control heating and/or cooling systems must be checked for mercury thermometers and an internal mercury filled glass bulb/ampule switch. A thermostat which contains either (or both) shall be removed and added to the mercury-containing materials. Note: Removal of the “entire” thermostat is required. Do not attempt to tear the unit apart and remove just a component part.

C. Ballasts

Each ballast shall be visually checked to see:

1. If the unit's product label or case has verbiage stating something like "**Contains no PCB**," OR
2. If the unit was so constructed as to preclude the need for oil cooling, e.g., lacking an outer metal jacket. *Appendix 10-10, Photograph #3*.

However if there is no such statement, or if the label is unreadable, and the unit is enclosed in a sealed metal jacket, it shall be considered hazardous and:

- Removed from the lighting fixture by disconnecting or cutting attached brackets and/or wiring,
- Placed in a sealable metal container,
- Quantified as to the number of units from each parcel,
- Itemized on a field inventory sheet to identify the number(s) and parcel(s) where units came from,
- Transported and temporarily stored at a designated temporary storage area.

Ballasts which are **PCB Free** are not regulated by EPA and may be taken to an Iowa landfill or scrap metal facility. However, it would be wise to check because many landfills will not accept "any" such material. (Usually because landfills are not equipped to check in-coming wastes and want to preclude PCB units from being incorporated into their landfill.) If no viable disposal option exists for NON-PCB ballasts, include them with the PCB items for reclamation processing.

NOTE:

1. Ballasts, transformers, and capacitors can be containerized together, but obviously must be containerized separate from the bulbs.
2. Ballasts, transformers, and capacitors should be containerized in quantities that facilitate reasonable handling and in a manner such that puncturing or crushing is prevented.
3. Storage containers for ballasts, transformers, and capacitors shall be a durable, sealable, metal container like an 18.9 L (5 gal) pail or a 208.1 L (55 gal) barrel. This is to prevent uncontrolled leakage of PCB oil should a unit get punctured.

Care in handling ballasts needs to be stressed. Metal jackets on some of these components are thin and can be easily punctured. If a ballast is found to be leaking oil during removal:

- Don rubber gloves for dermal protection. (Rubber gloves are available from Central Warehouse.)
- Place that unit in several plastic bags.
- Containerize separately.
- Mark container as "***Leaking PCBs***."

If a unit is found to be leaking in the storage container:

- leave it alone,
- place the lid on the container,
- mark container as having "***Leaking PCBs***," and
- start filling another container.

In either case, contact the Office of Location and Environment.

Paperwork and Labeling

As with almost anything else we do, there is documentation and labeling requirements here too.

A. Bulbs & Ballasts - **Field Documentation**

As noted in *"Project Requirements"* an inventory of removed bulbs and ballasts needs to be kept by parcel. This field inventory can be as simple as a sheet in the loose leaf field documentation which would contain a listing such as:

Parcel 240
2 ea 381 mm (15") fluorescent tubes
6 ea 1.2 m (4') fluorescent tubes
2 ea 2.4 m (8') fluorescent tubes
1 ea 500 watt Mercury Vapor bulb
Bulbs from Parcel 240 are in shipping container #1.

6 ea Ballasts (2 have PCBs, 4 UNK)
1 ea capacitor (PCBs UNK)
Ballasts from Parcel 240 are in shipping container #2.

Parcel 310
2 ea 1.2 m (4') fluorescent tubes
Bulbs from Parcel 310 are combined with parcel 240 in shipping container #1.

1 ea Ballasts (PCBs UNK)
Ballasts from Parcel 310 are combined with parcel 240 in shipping container #2.

A sample field inventory form is found in *Appendix 10-14*.

The original inventory listing shall be retained in the project file; a copy shall be attached to (or included with) each container prior to transporting containers to the temporary storage area. It is recommended to obtain some "sticky backed" Packing List envelopes from Office Supplies. Field inventories can then be placed into a Packing List envelope and stuck onto the container. (Inventories on storage containers will be needed to complete a shipping manifest, later. Refer to "Hazardous Waste Manifest" which follows.)

B. Bulbs - **Storage Documentation**

A “Used Lamp” Label shall be attached to each container when that container is delivered to the designated temporary storage area. The label shall contain the following information:

- "ACCUMULATION START DATE" is the date when bulbs are first placed in a container in the temporary storage area.
- “Location” is the temporary storage area.

C. Ballast - **Storage Documentation**

When storing containerized ballasts in the temporary storage area, two (2) labels are required:

1. Hazardous Waste Label, AND
2. PCB Notification Label

Both labels shall be attached to each container for ballasts when that container is delivered to the temporary storage area. The Hazardous Waste Label shall contain the following information:

- "Name" will be Iowa Department of Transportation
- "Accumulation Start Date" is the date when ballasts are first placed in a container in the temporary storage area.
- "EPA WASTE NO." for ballasts is ***PCB-2***.
- Blank lines on the bottom shall state:
  RQ, Polychlorinated Biphenyls, 9, UN2315, PG II (EPA Waste Code PCB-2) (ERG-31)

PCB Notification Label is completed by entering:

- "Also Contact" ***Mary Kay Solberg***
- "Tel. No." ***(515) 239-1741***

(*Refer to Appendix 10-10, Photographs #11 & 12*)

NOTE: Used lamp labels, Hazardous Waste labels and PCB notification labels are available from Office Supplies.

Storage and Shipping Requirements

A. Temporary Storage

The Department has contracted with a reclamation facility to take mercury containing bulbs and thermostats, and PCB (and non-PCB) ballasts, transformers, and capacitors. It is recommended to make prior arrangements for storage at a local Iowa DOT maintenance garage. If a job will generate more than 100 kilograms (220 pounds) of removed bulbs and ballasts, call the Office of Location and Environment. Most likely a "project specific" temporary storage area will be designated and arrangements will be made for the reclamation facility to come directly and pick up at the site.

Project engineers who opt to store at locations other than at an Iowa DOT maintenance garage are responsible to ensure bulbs and/or ballasts are delivered to the approved reclamation facility within 90 days from the date a container is placed in temporary storage. (That is, from the date placed on the Hazardous Waste Label as noted above.)

NOTE: The reclamation facility will not accept a whole light fixture, only bulbs, ballasts, transformers, and capacitors.

B. Labeling of Storage Containers

Storage at RCE or project field office:
Project engineers are responsible to fill out and attach labels noted above when bulbs and/or ballasts are in the temporary storage area.

Storage at a maintenance garage or maintenance facility:
Project engineers are responsible to ensure proper labeling of bulbs and/or ballasts generated from a project. For example assume:

1. Maintenance has an existing storage container, that container is used to store project-related items, and that container has proper labeling - no further action is required.

2. Maintenance does not have a container and the project supplies/provides a container. In this case, either Maintenance or Construction will have to label. It is the project engineer's responsibility to work-out an agreement for labeling.

BOTTOM LINE: Containers which have bulbs and/or ballasts stored in them and are in a temporary storage area HAVE to be properly labeled. Project engineers need to be sure wastes from construction projects are properly labeled.

C. Shipping Arrangements

If bulbs and/or ballasts are stored anywhere other than at a local Iowa DOT Maintenance facility, the project engineer shall make arrangements for shipment to the designated reclamation facility. Shipping arrangements can be made by contacting the Office of Location and Environment and make arrangements for the reclamation facility to pick up. This option incurs additional freight expense, but may be necessary in very special circumstances.

Shipments of bulbs and thermostats no longer require manifesting. Shipments of all other electrical components from a temporary storage area to the reclamation facility do require manifesting. In cases where removed materials are NOT temporarily stored at a local Iowa DOT Maintenance facility, project engineers (or their designated representative) are responsible to sign a Uniform Hazardous Waste Manifest when an Iowa DOT freight truck (or private waste hauler) picks up removed materials.

Removals and Project Costs

A. For removals, project engineers may:
   1. Have project inspectors remove bulbs, ballasts, transformers, and/or capacitors. Iowa DOT inspectors may remove, containerize, inventory, and transport these materials to the temporary storage area. There is no special hazardous waste training required for Iowa DOT employees. However, employee health & safety issues are involved, such as: Being sure the "juice" is off, being careful of broken glass, and other "common sense" items. If, for any reason project engineers do not want inspectors to be involved - go to the next two options.
   2. Issue Change Orders for a demolition contractor to remove, containerize, label, and transport bulbs and ballasts to the designated temporary storage area. The project engineer needs to provide some assurance inspection to ensure removal has occurred "prior" to demo and that the bulbs, ballasts, transformers, and capacitors were removed, counted, inventoried, containerized, and delivered to the designated temporary storage area. Bulbs and ballasts not removed or removed and broken or lying on the floor are NOT acceptable.
   3. External voucher removals to "someone competent." It is recommended to hire a local electrician, if this option is used. (Costs would most likely be time and materials and should be paid by an external voucher to the project using **Function Code 593**, and **Object Code 438**.) As noted above, the project engineer needs to provide some level of assurance inspection.

B. Shipping and Reclamation Costs

Costs associated with reclamation will be a project cost when the project engineer opts to store bulbs and/or ballasts at the RCE or project field office. The project engineer will process an external voucher, to the project, using **Function Code 592**, and **Object Code 438** to pay these costs.

Hazardous Waste Manifest

(The following is for shipments which originate from the RCE or project field offices.)
A Uniform Hazardous Waste Manifest is required for all shipments of hazardous waste. As of September 2006, the US EPA requires the use of a revised manifest with a unique

nation-wide, tracking number and only EPA approved registrants are allowed to print manifests. Manifests will be provided by the waste hauler/disposal facility. Project engineers (or designated representatives) are required to ***sign***, ***date***, and enter the ***project number*** on a manifest at the time of shipment.

Manifest Disposition:
After the manifest is signed by the project engineer (or authorized representative) and the truck driver:

- The "Generator Copy" page is removed and retained in the project files.
- Remove and retain (in the project files) all copies of field inventories attached to, or accompanying, the storage containers.
- The truck driver takes the original manifest and all remaining copies.

After shipments have been delivered to their final destination, the "Original – Return to Generator" copy, signed by the disposal facility, will be returned to the Office of Location and Environment, who in turn will forward a copy to the appropriate RCE or maintenance facility where the shipment originated. A copy shall be placed in the project files to document closure of the completed shipment.

NOTE: The "Generator Copy" collected at the time of shipment may be thrown away at this time. Retain the original field inventory sheets as a permanent project document.

Paperwork Reality Check:

A. During Storage:
   For temporary storage at maintenance garages, the RCE's office, or a project field office;
   - Project files contain the "original" field inventory.
   - Containers in storage shall have copies of the field inventory attached.

B. Immediately after shipment, a project file will have one of the following:
   1. When temporary storage was at a DOT maintenance garage;
      - Project files contain the "original" field inventory.
   2. When temporary storage was at the RCE's office or project field office;
      - Project files contain the "original" field inventory.
      - "Generator Copy" of the manifest with the field inventory copies attached.

C. After completion of the shipment, the project file will have one of the following:
   1. When temporary storage was at a DOT maintenance garage;
      - Project files contain the "original" field inventory.
   2. When temporary storage was at the RCE's office or project field office;
      - Project files contain the "original" field inventory.
      - The "Original – Return to Generator" copy of the manifest, with Box "20" signed and dated. This copy is returned to the Office of Location and Environment by the reclamation facility. It will be forwarded to the project engineer. The process usually takes 35 to 40 days after shipment.

      NOTE: The "Original – Return to Generator" copy shall be retained with the project files for 3 years.

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