

LEXINGTON, KENTUCKY EECBG WASTE MANAGEMENT PLAN

As part of Lexington's Energy Efficiency and Conservation Strategy, energy improvements will be made to municipal buildings under our *Lead by Example* initiative and also to community buildings occupied by non-profit organizations under our *Empower Lexington* initiative. During these improvements, wastes will be generated which require proper handling both to protect the environment and to comply with applicable environmental regulations such as the federal Toxic Substances Control Act (TSCA). To ensure this waste material is managed properly, we have developed this waste management plan.

Where practical, items will be reused. Items that cannot be reused will be recycled if possible. Items that cannot be recycled will be disposed of in accordance with all applicable environmental regulations, usually in a permitted construction demolition and debris (CD&D) landfill or in a permitted contained landfill.

Wastes generated during improvements made at LFUCG facilities will in many cases be handled through existing mechanisms and programs, such as our internal Universal Waste Program. Wastes generated by contractors at buildings which are not owned by the LFUCG (such as nonprofit arts facilities under our Energizing the Arts initiative) will also be managed in a similar manner but not through LFUCG internal programs. Language requiring proper disposal will be included in bid invitations and contracts.

Specific details for managing materials likely to be generated are presented below.

Lamps

Any lamps removed during energy improvements at government buildings (retrofits) will be managed as Universal Waste in accordance with Kentucky regulation 401 KAR 43:050 and corresponding federal regulations. The LFUCG has had an internal Universal Waste Program in place for a number of years and is experienced in this area. These materials will be collected and shipped off site to a Universal Waste vendor, where they will be recycled to the extent possible (to include mercury from fluorescent bulbs which will be retorted for resale).

Batteries

Any batteries removed (from emergency lighting, etc) during energy improvements at government buildings (retrofits) will be managed as Universal Waste in accordance with Kentucky regulation 401 KAR 43:050 and corresponding federal regulations. The LFUCG has had an internal Universal Waste Program in place for a number of years and is experienced in this area. These materials will be collected and shipped to an off site vendor where they will be recycled to the extent possible.

Mercury Containing Equipment

Any mercury thermostats, thermometers, temperature gauges, manometers, barometers, switches and similar items removed during energy improvements at government buildings (retrofits) will be collected and shipped off site to either a Universal Waste vendor or, in the case of thermostats, to the nonprofit Thermostat Recycling Corporation where they will be recycled to the extent possible (to include mercury which will be retorted for resale).

Fluorescent Lamp Ballasts

The LFUCG has had an internal program in place to collect and manage both electronic and magnetic fluorescent light ballasts for a number of years and is experienced in this area.

Electronic light ballasts will be collected and shipped off site to a vendor where they will be recycled to the extent possible (as "escrap").

Electromagnetic ballasts manufactured prior to July 1, 1979 shall be considered to contain PCBs unless they are marked "Contains No PCBs." Electromagnetic ballasts manufactured between July 1, 1979 and 1991 shall be considered to contain di (2-ethylhexyl) phthalate or DEHP. Removed magnetic fluorescent light ballasts which contain DEHP or PCBs will be collected and shipped off-site for either recycling or incineration. Should short-term storage of these items be necessary, the LFUCG has filed the required one-time EPA PCB Notification that allows us to store PCB items for a limited time and will store these PCB and DEHP magnetic ballasts in a secondarily contained concrete storage area to minimize the chance of spills.

Radioactive Wastes

Smoke detectors can contain a small amount of Americium 241, a radioactive material. Self-luminous EXIT signs can also contain radioactive material such as tritium gas, a radioactive isotope. Items such as smoke detectors and self-luminous EXIT signs that are removed during building energy improvements and contain low level radioactive materials will be collected and shipped to a Nuclear Regulatory Authority (NRC) licensed vendor for proper off-site management in accordance with NRC requirements. Typically, these will be returned to the manufacturer for proper disposal.

Asbestos

Asbestos containing items (ACM) which are removed from LFUCG buildings will be managed in accordance with applicable EPA and OSHA requirements. The LFUCG has an asbestos abatement team trained to identify and remove asbestos (if needed). The LFUCG also has a written internal asbestos management policy (Policy # 26) which will be followed to help ensure asbestos is not unknowingly disturbed and that in cases where asbestos must be disturbed, it is removed and managed properly to protect workers and

the environment. Removed ACM will be disposed of in a landfill permitted to accept ACM.

Lead

The LFUCG has a Lead Compliance Program in place as well as a lead abatement team housed within our Division of Facilities and Fleet Management trained to identify and remove lead (if needed) at LFUCG facilities. This team is tasked with helping ensure lead is not unknowingly disturbed and that in cases where lead must be disturbed, it is managed properly to protect workers and the environment. Lead containing items which are removed from LFUCG buildings will be managed in accordance with applicable EPA requirements. Removed lead will be disposed of in a landfill permitted to accept this type of waste.

Electronics

The LFUCG has had an electronics recycling program in place for a number of years. Any electronics such as controllers, computers, etc, generated during EECBG improvements will be collected and shipped to an off site vendor for recycling.