









Compliance Assistance & Green Incentives January 17, 2018

Agenda

Katie Bergfeld, Energy Office, DOEE Welcome	10:00-10:05
Stephen Ours and Joanna Vivanco, Air Quality Division, DOEE Air pollution sources in residential and commercial buildings. Permit and regulatory requirements for combustion equipment Regulations for demolition and renovation in buildings containing asbestos	10:05-10:30
Vickie North, Hazardous Materials, DOEE Regulations that apply to the management of hazardous waste (including used fluorescent light bulbs), EPA ID number requirements secondary containment and universal waste	10:30-10:55
Katie Bergfeld, Energy Office, DOEE EPA EnergyStar Benchmarking, news and due dates	10:55-11:10
BREAK	11:10-11:20
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DEPARTMENT OF ENERGY & ENVIRONMENT



Agenda

Brandon Conheim, District of Columbia Sustainable Energy Utility (DCSEU) Learn how DCSEU offers technical guidance to its customers, and how to take advantage of incentives for projects that lead to gas and electric savings	11:20-11:40
Upasana Kaku, Urban Ingenuity Introduction to Property Assessed Clean Energy (PACE) financing, the District's only green financing program, requirements for the program and case studies of DC PACE projects	11:40-12:00
Lauren Linville, Watershed Protection, DOEE Program services and incentives offered for your business	12:00-12:20
Danielle Nkojo, Urban Sustainability Administration Other waste issues	12:20-12:30









Stephen Ours Air Quality Division DOEE

Joanna Vivanco Air Quality Division DOEE

AIR QUALITY REQUIREMENTS 101

2018 Compliance Assistance and Green Incentives Workshop



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Common Sources of Air Pollution in the District















Air Quality Permitting – Basic Requirement

- If you plan to install equipment that would emit air pollution, you need to apply for and obtain an air quality permit <u>before you begin construction/installation of the</u> <u>equipment</u>.
- Examples:
 - » Boilers (>5MMBTU/hr heat input)
 - » Cogeneration Equipment
 - » Generators
 - » Paint Booths
 - » Anything else that will emit air pollution



Who Applies?

- Permits are issued to <u>owners</u> or <u>operators</u> of equipment who must subsequently maintain a <u>permit to operate</u>.
- Frequently the owners or operators ask construction companies, equipment suppliers/installers, developers, etc. to do the legwork for getting a permit as part of their construction duties.
- The owner or operator needs to sign the permit application.



What Kind of Permit Do I Need?

- Source Category Permits (aka general permits) fastest and easiest, but for limited categories of permits.
- Standard Chapter 2 Permits
- Nonattainment New Source Review (NSR)
- Minor New Source Review (MNSR)
- Title V (major source)
- See http://doee.dc.gov/service/airpermits



Engine Idling Program





On-road Engine Idling

- Idling of on-road <u>gasoline</u> or <u>diesel</u>-powered motor vehicles on public or private space for more than 3 minutes is prohibited while the vehicle is parked, stopped, or standing, <u>including for the purpose of operating air conditioning or</u> <u>heating equipment</u>
- Exceptions:
 - » Non-commercial private passenger vehicles.
 - » Idling to operate power take-off equipment such as dumping beds, cement mixers, refrigeration systems, content delivery, winches, or shredders.
 - » Idling up to 5 minutes when the temperature is at or below freezing (32°F).
 - » Private use, not for compensation.



Non-road Engine Idling

 Idling of Non-road <u>diesel</u>-powered engines for more than 3 minutes is prohibited.

Exceptions:

- » Idling for up to 15 minutes when queuing (i.e. intermittently moving forward to perform work).
- » Idling for safety, servicing, inspection, or emergency purposes.
- Idling up to 5 minutes to operate heating equipment when the temperature is at or below freezing (32°F).



Fugitive Dust





Fugitive Dust

- **Reasonable precautions** shall be taken to minimize the emission of any fugitive dust into the outdoor atmosphere.
- The emission of fugitive dust from the following is prohibited:
 - Any material handling, screening, crushing, grinding, conveying, mixing, or other industrial-type operation or process;
 - » Heater-planers in repairing asphaltic concrete pavements;
 - Portable tar-melters, unless close-fitting lids, in good repair, for the tar-pots are available and are used;
 - » The ventilation of any tunnelling operation; or
 - » The cleaning of exposed surfaces through the use of compressed gases.



Odor

An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life and property is prohibited.



Contact Information

Stephen S. Ours, P.E. Chief, Permitting Branch Air Quality Division Department of Energy and Environment (202) 535-1747 stephen.ours@dc.gov



DEPARTMENT OF ENERGY AND ENVIRONMENT AIR QUALITY DIVISION

COMPLIANCE & ENFORCEMENT BRANCH ASBESTOS ABATEMENT PROGRAM



Cecily Beall, Associate Director, Air Quality Division
Kelly Crawford, Chief of Compliance & Enforcement Branch
Ralph Knatt, Environmental Protection Specialist
Joanna Vivanco, Environmental Protection Specialist



Topics

- Responsibilities of building owners and property managers under federal and district asbestos-related regulations;
- Asbestos-Containing Materials Survey;
- Operations and Maintenance Plan;
- DOEE-AQD-Asbestos Abatement Notification/Permitting Process (obtaining a permit);
- Emergency asbestos abatement;
- Facility quantity thresholds;
- Clearance requirements for asbestos abatement and raze projects.



Where Could Asbestos Be Found?

- Sprayed-on fire proofing and insulation;
- Pipe, Duct and Boiler Insulation;
- Wall and ceiling insulation
- Ceiling tiles and/or associated mastic;
- Floor tiles and/or associated mastic;
- Putties, caulks and cements (e.g. cement pipes, siding and panels know as "Transite");
- Plaster material (acoustical and decorative);
- Seam sealant on pipe and ducts;
- Sink under-coat;
- Roofing materials (e.g. membrane, flashing, seam sealant, cement, silver coat)



Asbestos-Related Regulations

- DOEE Title 20 DCMR § 800 (Control of Asbestos)
- EPA Title 40 CFR 61- Subpart M § 61.145
 National Emission Standards for Hazardous Air Pollutants (NESHAP)
 Asbestos Demolition and Renovation
- EPA Title 40 CFR 763 Subpart E Asbestos Hazard Emergency Response Act (AHERA) Asbestos-Containing Materials (ACM) in Schools
- OSHA Title 29 CFR § 1910.134 (Respiratory Protection)
- OSHA Title 29 CFR § 1926.1101 (Asbestos in Construction)



Building/Facility Owner Responsibilities

- Asbestos-Containing Materials Survey: prior to the commencement of the demolition or renovation, <u>thoroughly inspect</u> the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including location and quantity of Category I and Category II non-friable asbestos-containing materials (ACMs) (<u>40 CFR § 61.145</u>);
- Hazard Communication: Inform employers, employees, tenants, and others of the presence, location and quantity of any ACM (<u>29 CFR § 1926.1101</u>);
- **Response Actions:** Ensure that only trained individuals conduct work that may release asbestos fibers into the air (<u>40 CFR § 763.90-93</u>);
- DOEE Notification/Permit: Ensure that a DC licensed asbestos abatement contractor submits "Notification of Demolition and Renovation" to DOEE, ten (10) business days before starting the work, for projects involving 260 linear feet or 160 square feet or 35 cubic feet of ACM (20 DCMR § 800).



EPA NESHAP 40 CFR §61.145



- EPA Notification of Demolition and Renovation
- Visible Emissions;
- Definitions for Facility, Installation and Regulated ACM (RACM);
- ACM Quantity Thresholds:
 - 260 linear feet on pipes;
 - 160 square feet;
 - 35 cubic feet
- Transport/Disposal



DOEE/AQD - Asbestos Abatement Program Notification/Permitting Process - 20 DCMR § 800

DOEE Asbestos Abatement Permit for NESHAP-size projects

Required Documentation:

- 30-Day Notice to Tenants/Building Occupants; and
- 10-Business Day DOEE Asbestos Notification Form (original); and

Emergency Asbestos Abatement;

Revisions (changes on scope of work or schedule);

Variances (case-by-case basis);

- Permit Fee (\$641 or \$1,122 2600 linear feet or 1600 square feet);
- Blanket Permit Fee (\$1,122 valid for one year).





- Thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos.
- If any suspect ACM is uncovered during the demolition/renovation work, STOP any activity that may impact the suspect ACM; then, assume and treat it as ACM, or sample and analyze it for asbestos content.
- 3. Facility means any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units).

Installation means any building or structure or any group of buildings or structures at a single demolition or renovation site that are under the control of the same owner or operator.



ASBESTOS ABATEMENT PROJECT IN A FACILITY OR INSTALLATION



Comply with EPA, OSHA and District regulations, and submit to DOEE the required documentation for an Asbestos Abatement Permit

Regulated Asbestos-Containing Material (RACM):

- Friable asbestos material;
- Category I non-friable ACM that has become friable;
- Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading; or
- Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.



Final Clearance Air Sampling

Following asbestos abatement work within a regulated area:

- Transmission electron microscopy (TEM) air sampling must be performed in accordance with EPA AHERA regulation 40 CFR 763 Subpart E Appendix A;
- If the required EPA AHERA air sampling protocol cannot be followed, the DC licensed asbestos abatement contractor must submit to DOEE AQD Asbestos Abatement Program a Clearance Variance Request in writing;

NOTE: Must receive approval, in writing, from DOEE – AQD - Asbestos Abatement Program;

Within twenty four (24) hours after receiving final written results, the DC licensed asbestos abatement contractor must submit to DOEE – AQD - Asbestos Abatement Program the data indicating the asbestos structure (or fiber) concentration in the regulated area, before barriers are removed;

NOTE: Final clearance variance request and results can be submitted via email at **asbestos.permit@dc.gov**



Clearance Letter for Raze Permit

Submit to DOEE-AQD-Asbestos Abatement Program the following documentation:

- Copy of the <u>DCRA Raze Permit Application</u>; and
- Corresponding blank <u>Clearance Letter</u>, provided by DCRA, for approval and signature; and
- Asbestos-Containing Materials (ACMs) <u>Survey Report</u>, indicating that "exploratory demolition" was conducted. This exploratory work consists on selective demolition where ACMs are suspect to be hidden behind walls and/or hard ceilings:
 - If any ACM is identified or assumed to be present, provide an Asbestos Abatement <u>Final</u> <u>Clearance Sampling Report</u>, indicating that the ACM(s) has(have) been removed; and/or
 - If any Category I or II Non-Friable ACM (Non-RACM) will remain in place during demolition activities, provide a <u>Demolition Work Plan</u>, indicating current condition, handling and disposal of remaining ACM.
- Additional information may be requested based on the documentation that will be provide

NOTE: Required documentation can be submitted via email at <u>asbestos.raze@dc.gov</u>



THANK YOU!

For more information contact the Asbestos Abatement Program at: <u>asbestos.permit@dc.gov</u> or visit doee.dc.gov/service/asbestosabatement





Vickie North, Hazardous Materials, DOEE

RCRA C HAZARDOUS WASTE

Environmental Compliance and Technical Assistance Session for Building Managers

> Victoria North Toxic Substances Division Hazardous Waste Branch victoria.north@dc.gov 202-535-1909





- This information was prepared specifically for building managers and may not be appropriate for other facilities.
- This information is highly condensed and does <u>not</u> include all regulatory requirements. It CANNOT be used as training material.
- This information includes best practices which may exceed the regulatory requirements.
- DOEE cannot attest to the accuracy of information provided at the links in the presentation. Providing these links does not constitute an endorsement by DOEE or any of its employees.



• Failing to get an EPA ID #

(also called an EPA Handler ID # or an EPA Generator ID #).

- Failing to identify hazardous wastes (HW).
- Failing to properly manage hazardous wastes (HW),

universal waste (UW), or used oil.

- Failing to properly dispose of hazardous wastes (HW), universal waste (UW), or used oil.
- Failing to keep paperwork to show you did everything right.
- Tenants...



PENALTIES!

- No EPA ID # is a \$2,000 fine.
- Not properly managing regulated wastes has fines ranging from \$500 to \$2,000 per infraction.
- Not submitting the annual renewal fee is a \$500 fine.
- Not submitting the annual self-certification of compliance is a \$500 fine.
- Clean-up expenses caused by not properly managing or disposing of regulated wastes cost many thousands of dollars.
- Failure to properly manage regulated wastes puts you, your staff, your family, and the environment at risk.



- 1. Get an EPA ID #.
 - All generators of hazardous waste, universal waste, or used oil in the District must have an EPA ID #.
 - An EPA ID # looks like this: DCR 000 500 109.
 - To get an EPA ID #, fill out EPA Form 8700-12 and submit it, with the registration fee, to the DOEE Hazardous Waste Branch.
- 2. Identify all the items in your facility that will be hazardous waste if you can't use them.
- 3. Properly manage and dispose of hazardous waste, universal waste, and used oil.
- 4. Train your staff to follow the rules.
- 5. Keep your paperwork to prove you did everything right!



The Resource Conservation and Recovery Act (RCRA) regulates ALL waste. Hazardous waste is regulated under RCRA C.

Household hazardous wastes (HHW) are excluded from the hazardous waste regulations. Households include apartment buildings, hotels, motels, condos, co-ops, military barracks, dormitories, homeless shelters, and summer camps. Wastes covered by the household hazardous waste exclusion must satisfy two criteria:

- 1. The waste must be generated by individuals on the premise of a temporary or permanent residence, and
- 2. The waste stream must be composed primarily of materials found in wastes generated by consumers in their homes.

All other businesses are regulated: all non-profits, non-boarding schools, Federal government buildings, and State government buildings, etc.



Regulated Hazardous Wastes Are:

- Listed wastes
- Characteristic wastes
 - » Ignitable (flash point below 140°F or 60°C)
 - » Corrosive (pH <2 or pH >12.5)
 - » Reactive
 - » Toxic
- Anything the Administrator or the Director says is HW
- Anything you say is hazardous waste


- Used oil
- Dry cleaning fluid
- Oil based paint and paint thinners (ignitable)
- Some concentrated cleaning products (corrosive)
- Most aerosol products (ignitable)
- Spoiled gasoline (ignitable)
- Car or forklift batteries
- Rechargeable batteries
- Fluorescent lamps
- Mercury thermostats



- 1. Decide if it is a waste. Remember, the regulations only apply to waste, not to products you are currently using.
- 2. Determine if the waste meets or exceeds one of the criteria in the regulation (see slides 7 & 11).
 - Review a current MSDS or SDS for the product, the flash point and pH will be listed. Also, many SDSs now state if the item will be regulated when it becomes a waste.
 - Ask the vendor for the flashpoint, pH, and ingredients.
 - Submit a sample for testing
- 3. Any waste which meets or exceeds one of the criteria, is a hazardous waste.



IT MIGHT BE A HAZARDOUS WASTE IF...





- If it says 'danger'
- If it says 'flammable'
- If it says 'toxic'
- If it says 'poison'
- If it says 'warning'





- If it has a picture of a fire
- If it is an acid
- If it is a base
- If it is a solvent
- If it has a picture of a skull and cross bones

These items should be evaluated to see if they must be managed as hazardous waste.

Note: this list is not exhaustive, it is intended to initiate the evaluation process.



OTHER RCRA C REGULATED WASTES







- Universal waste is a subcategory of hazardous waste. You may choose to manage certain items as universal waste, or you may manage them as hazardous waste.
 - » Spent fluorescent lamps (intact only, broken or crushed lamps are usually hazardous waste)
 - » Some batteries
 - » Some pesticides
 - » Mercury thermostats
- Used oil is also regulated





HOW TO MANAGE YOUR HAZARDOUS WASTE ITEMS - **SQGs ONLY**

- Identify it
- Label it
- Date it
- Close it
- Inspect it
- Dispose of it (correctly)
- Train staff



HOW TO MANAGE YOUR HAZARDOUS WASTE ITEMS - **SQGs ONLY** (continued)

- Identify it
 - Make a determination on all waste to identify all which require management under the regulation (see slide 9)
- Label it
 - With the contents if it is not waste
 - "Hazardous Waste" if it is hazardous waste
 - Universal waste allows several variants (see slides 14 and 15)
- Date it with the accumulation start date
- Close it keep it in a closed container
- Inspect it conduct weekly inspections, and keep a log
- Dispose of it (correctly). Arrange for appropriate disposal using a licensed contractor <u>on a schedule</u>. You will get a manifest. Keep the manifest for your records.
 - Using small bottles helps
- Train staff



HOW TO MANAGE YOUR HAZARDOUS WASTE ITEMS - **CESQGs ONLY**

- Identify it
- Dispose of it (correctly)
- Train staff



CESQG and SQG are generator statuses.

The statuses are based on the weight of hazardous waste your facility generates or creates each month.

Note: This is not how much you <u>ship</u> each month. It is how much you <u>create</u> each month. It is <u>not</u> an average.



WHAT DO CESQG AND SQG MEAN? (continued)

- CESQG stands for Conditionally Exempt Small Quantity Generator.
 - CESQGs are exempt from SOME of the regulations, not all of them.
- To qualify as a CESQG, your facility must generate less than 220 lbs of hazardous waste each month <u>and</u> less than 2.2 lbs of acute waste each month.
 - A drum of crushed lamps weighs about 600 lbs, so if your facility generates more than 1/3 drum per month, your facility is a SQG.
- CESQGs do not have a time limit on how long they can store hazardous waste. However, there is a limit of 2,200 lbs that can be stored onsite.



- SQG stands for Small Quantity Generator.
- To qualify as a SQG, your facility must generate less than 2,200 lbs of hazardous waste each month <u>and</u> less than 2.2 lbs of acute waste each month.
- SQGs can usually only store hazardous waste onsite for up to 180 days, although there are special circumstances that allow storage for up to 270 days.



HOW TO MANAGE UNIVERSAL WASTE LAMPS

- Contain it put spent lamps in a drum, box, or carton
- Label it "Universal Waste Lamps" or "Waste Lamps" or "Used Lamps."
 - You can't call them tubes or bulbs, only lamps.
- Date it with the accumulation start date
- Close it keep it in a closed container
- Dispose of it correctly. You may store universal waste at your site for up to 1 year.
- Arrange for appropriate disposal by a licensed contractor <u>on a schedule</u>
- Train staff
- Incandescent lamps and LED lights are not universal waste
- Remember that broken or crushed lamps are never universal waste; they are usually hazardous waste.





HOW TO MANAGE UW BATTERIES

- Label it "Universal Waste Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)."
- Date it with the accumulation start date
- Dispose of it correctly. You may store universal waste at your site for up to 1 year.
 - Arrange for appropriate disposal by a licensed contractor <u>on a</u> <u>schedule</u>
- Train staff
- Alkaline batteries are not universal waste



HOW TO MANAGE YOUR USED OIL

- Label it "Used Oil"
- Close it Keep the container closed
- Contain it Use secondary containment
- Train staff
- You <u>cannot</u> burn used oil in the District
- Cooking oil is not regulated by DOEE. It is regulated by DOH.



OTHER REGULATORY BODIES

- DOEE
 - » Water Quality Division
 - » Lead Program
 - » Air Quality Program
- OSHA
- WASA / DC Water
- Fire Marshall
- DOT
- Others



- Each site must maintain current information on file with the DOEE Hazardous Waste Branch
 - Remember to send in a revised 8700-12 when the contact person changes, the mailing address changes, the waste streams change, or the generator status changes.
 - It's free to update the information!
- The annual fee is due <u>every</u> March 1st.
- The annual self-certification of compliance is due <u>every</u> March 1st.



As of October 23, 2015, the annual fee for conditionally exempt small quantity generators (CESQGs) will be \$250 unless the generator has less than 8 employees. For CESQGs with less than 8 employees, the fee is \$100.

This was added to the regulations to assist smaller businesses. In order to qualify for the \$100 CESQG fee, you must have less than 8 employees <u>company wide</u>.



EXAMPLES



8/18/17 | SLIDE: 53

WHAT NOT TO DO



Universal waste lamps must be:

- » in boxes
- » which are closed
- » are labeled
- » and are dated



WHAT NOT TO DO



Labels must be meaningful!

Hazardous waste containers must bear the words "Hazardous Waste" and the date it was determined to be a waste.



SECONDARY CONTAINMENT FOR **SMALL** CONTAINERS OF USED OIL

Secondary containment does not have to be fancy or pretty, it just needs to work!

You may have something appropriate onsite already.







SECONDARY CONTAINMENT FOR **SMALL** CONTAINERS (CONTINUED)





A flammables or corrosives cabinet is often suitable.

Confirm that the unit you have has a tray in the bottom, older units may not have one.

Also, check the tray occasionally to make sure it is not rusted out.



SECONDARY CONTAINMENT FOR **LARGE** CONTAINERS OF USED OIL





These are suitable for use outdoors.

There are different styles available.



SECONDARY CONTAINMENT FOR **LARGE** CONTAINERS OF USED OIL (CONTUNUED)



These are <u>not</u> suitable for use outdoors.

A variety of configurations are available, pick one that works in your space.



SECONDARY CONTAINMENT FOR ABOVE GROUND STORAGE TANKS OF USED OIL





USED OIL LABEL EXAMPLES

Handmade and hand written labels are ok!









Don't forget that used oil must be in secondary containment, this example is <u>not</u> in secondary containment.



UNIVERSAL WASTE BATTERY LABEL EXAMPLES

Handmade and hand written labels are ok!



It may be easier to put small batteries in a container and label and date the container rather than labeling and dating each individual battery.



UNIVERSAL WASTE LAMP LABEL EXAMPLES



Make sure the date is included

Handmade and hand written labels are ok!

Remember to write the date on each label!



HAZARDOUS WASTE LABEL EXAMPLES

HAZARDOUS WASTE
CONTENTS
HANDLE WITH CARE! CONTAINS HAZARDOUS OR TOXIC WASTES

Remember to write the date on the labels!

Handmade and hand written labels are ok!





CONTAINERS OF USED OIL MUST BE CLOSED

A self-closing funnel may be used with above ground storage tanks or 55-gallon drums of <u>used oil only.</u>





This funnel is not self-closing



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This is what a "Uniform Hazardous Waste Manifest" looks like

SQGs are required to use manifests, CESQGs are not.

You will get one copy when your hazardous waste items are picked up.

A final copy will be mailed to you when it arrives at the TSDF.

Both CESQGs and SQGs are responsible for the waste "from cradle to grave", the final manifest copy is your proof that the waste was delivered.

Manifests are a great tool for tracking waste "to the grave".

8/18/17 | SLIDE: 66

Universal waste items are not required to be transported with a manifest, a bill of lading or other document may be used.

This is an example of a "certificate of recycling" for universal waste items.

Note that you are responsible "from cradle to grave", and this example does not show the "grave" (where the items were delivered to).

CERTIFICATE OF RECYCLING

This certifies that the items/wastes listed below were received for recycling/processing by

and the transportation, receipt, storage, and

processing methods employed are in accordance with local destination facility permit parameters, the Toxic Substances Control Act, The Resource Conservation and Recovery Act, the Hazardous Materials Transportation Act, the Occupational Health and Safety Act, and all applicable federal, state, and local laws.

Items Received

DESCRIPTION	QUANTITY	
Misc. Office Machinery	78 lbs	
Alkaline Batteries	95 lbs	
Non-PCB Ballast	57 lbs	
55 Gallon Drum Crushed Lamps	302 lbs	

Certificate Issued to:



City, State, Zip:

Per our contract with aforementioned destination facility, the above materials have been received for recycling/processing on date noted below.

12/12/2014 Preside









WHERE IS THE INFO ON AN SDS? This is what the first page of an SDS looks like:





WHERE IS THE INFO ON AN SDS?

PH AND FLASHPOINT ARE **ALWAYS** CALLED OUT

9 – Physical and Chemical Properties						
Appearance:	Light amber liquid	Flammable Limits: (Solvent Portion)	LEL: 0.6% UEL: 8%			
Odor:	Mild petroleum odor	Vapor Pressure:	95-115 PSI @ 70°F			
Odor Threshold:	Not established	Vapor Density:	Greater than 1 (air=1)			
pH:	Not Applicable	Relative Density:	0.8 – 0.82 @ 60°F			
weiting/Freezing Point	Not established	Solubilities:	Insoluble in water			
Boiling Point/Range:	361 - 369°F (183 - 187°C)	Partition Coefficient; n- octanol/water:	Not established			
Flash Point:	122°F (49°C) Tag Closed Cup (concentrate)	Autoignition Temperature:	Not established			
Evaporation Rate:	Not established	Decomposition	Not established			

3	HAZARDS IDENTIFICATION				
3.1	Fire and Explosion				
	Flash point:	Tag open cup 44° Celsius (minimum)			
	Flammable/explosion limits:	(Low) 0.6% (High) 8.0%			
		(Solvent portion)			
	Extinguishing media:	CO ² , dry chemical, foam			



13 - Disposal Considerations

If this product becomes a waste, it would be expected to meet the criteria of a RCRA ignitable hazardous waste (D001). However, it is the responsibility of the generator to determine at the time of disposal the proper classification and method of disposal. Do not puncture or incinerate containers, even empty. Dispose in accordance with federal, state, and local regulations.



RESOURCES

Questions can be answered by contacting DOEE Hazardous Waste Branch at: (202) 671-3308

District Regulations and Law may be viewed online at: <u>http://doee.dc.gov/node/14732</u>

EPA Form 8700-12 can be found here: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/publication/attachments/Form%208700-12%20notification.pdf

Guide: How to Determine if Solvents That Can No Longer Be Used in the Workplace Are Hazardous Waste <u>https://www.epa.gov/hwgenerators/guide-how-determine-if-solvents-can-no-longer-be-used-workplace-are-hazardous-waste</u>

Department of Energy and the Environment website: <u>www.doee.dc.gov</u>

EPA Regulations may be viewed online at: <u>https://www.epa.gov/rcra/resource-conservation-and-recovery-act-rcra-regulations#haz</u>

EPA Assistance document for Managing Hazardous Waste for Small Businesses. This addresses only the Federal requirements: <u>https://www.epa.gov/sites/production/files/2014-12/documents/k01005.pdf</u>

Webinar about Federal RCRA C (hazardous waste) requirements only, hosted by WSPPN, and the State of Hawaii: <u>http://wsppn.org/webinars/</u> <u>http://wsppn.org/wp-content/uploads/2011/09/Haz-Waste-Webinar-March-20131.pdf</u>

Link to ECHO, a national database listing all registered hazardous waste sites: <u>http://echo.epa.gov/</u>





Katie Bergfeld Energy Office DOEE


DEPARTMENT OF ENERGY & ENVIRONMENT

DC Energy Benchmarking

Katie Bergfeld Department of Energy & Environment Government of the District of Columbia

August 22, 2017

DOEE HQ 1200 First St NE Washington DC

Toward a Sustainable DC

- Overall Vision:
- In just one generation—20 years—the District of Columbia will be the healthiest, greenest, and most livable city in the United States.

Targets: By 2032...

- Cut citywide energy use 50%
- Cut citywide greenhouse gas emissions 50%
- Increase use of renewable power to 50%

Purposes of a Benchmarking Law

- 1. Help Owners and Managers understand and their energy use and compare to peers
- Help Policymakers and DSM Program Administrators with analysis, planning, & program design
- 3. Drive Market Transformation

Building Energy Use in DC

Buildings are DC's largest source of Greenhouse Gas Emissions:

Utilities are the largest non-fixed expense for DC building owners.











DC BENCHMARKING LAW

•Green Building Act of 2006 & Clean and Affordable Energy Act of 2008. DC Official Code 6-1451.02, .03(c). Also 20 DCMR 3513.

- All large existing buildings must annually benchmark energy and water usage in ENERGY STAR® Portfolio Manager® and report to DOEE by April 1st of each year
- (Large New Buildings must model and report projected energy use in ENERGY STAR® Target Finder™)
- Adopted in 2008, implemented 2013
- Benchmarking data disclosed beginning in 2nd year



U.S. Building Benchmarking and Transparency Policies



What Buildings?



Prepare	•December - January •Publish Covered Building List, Updated Guidance Documents
Support	•February – March: "Reporting Season" •Building owners compile data, enter in Portfolio Manager •Benchmarking Help Line Provides Support
Report	•April 1 st •Annual Reporting Deadline
Review	•April-May •DOEE reviews data completeness and quality; follows up •Initial Data shared with Partners
Warn	•May-July •Notices of Violation (NOVs) issued; sets 30-day warning period
Fine	•July-Fall •Notices of Infraction (NOIs) issued •Fines of \$100/day; usually \$1,000 for 10 days
Disclose	•Late Summer / Early Fall •Public Disclosure published •Summary Analysis published

Enforcement Cycle

Keys to Success

- 1. Common Standards
- 2. Transparency
- 3. Data Quality
- 4. Training & Engagement
- 5. Data Access
- 6. Enforcement

Common Standards



The most-used energy measurement and tracking tool for commercial buildings.

Benefits of using Portfolio Manager:

- Free
- Accessible (web-based)
- Industry-standard
- Provides 1-100 score to help building owners easily assess energy usage



Transparency

Ratings for all buildings

Efficiency of existing building stock continuously improves

> Owners improve efficiency to compete

Ratings disclosed to market

Market compares building performance

Market rewards energy-efficient properties

Image courtesy of



BUILDSMART DC

ENERGY USE ADDS UP

Over **400 DGS facilities** serve nearly **100,000** people every day.



DELIVERING RESULTS

Innovative programs **create savings** and **lower emissions** by finding **new and unique** sources of power.



Dunbar High School Rooftop Solar Panels

Last school year, DGS - Sustainability & Energy proudly presided over the launch of a 463 kiloWatt solar panel installation at Dunbar High School. This installation is the largest rooftop solar panel array in the District, and helped Dunbar receive the highest LEED certification score ever for an American high school. LEED POINTS

343,400 SF

\$735,088

ANNUAL ENERGY COST

91

SIZE

BUILDINGS	
	Wilson Building 1350 PENNSYLVANIA AVENUE NW 1350 PENNSYLVANIA AVENUE NW 1350 PENNSYLVANIA AVENUE NW 1350 MILLION

The John A. Wilson Building, popularly known simply as the Wilson Building or the JAWB, houses the offices and chambers of the Mayor and Council of the District of Columbia. Originally called the District Building, it was renamed in 1994 to commemorate former Council Chair John A. Wilson. Show More



annual energy cost \$705,502.28	ANNUAL GHG EMISSIONS (TONS) 3,572.74		
	328,760	63	
BUILDING TYPE	SIZE (FI ²)	EUI (KBTU/SF/YR)	

Data services and analytical graphics provided by

NEW CITY



FIND YOUR BUILDING

Transparency

DOEE launched new map in September 2017



www.energybenchmarkingdc.org

Data Quality



Data Quality

Complete and Accurate Reports for Private Buildings by Sector (2013-2016)



Training & Engagement •Benchmarking Help Center

- 2013-2014, @ DCSEU: Over 3,000 email & phone requests
- 2015-present @ DOEE: Over 4,000 email & phone requests
- 20+ in-person trainings
- Assistance both before and after reporting

Partners are key



Utility Data Access: Protecting Privacy



Utility Data Access: Expanded Access

- <u>Partial Solution</u>: DOEE requires non-residential tenants to provide their landlord access to data
- <u>Better Solution</u>: Aggregated whole-building consumption data, with direct automated upload to ENERGY STAR Portfolio Manager
 - Mandated in the *Sustainable DC Act of 2014*
 - Pepco (Electricity): Aggregation & Upload Available Now
 + Next-day Green Button Interval Data Feed
 - Washington Gas: Aggregation Now, Upload in 2018





Increasing Enforcement



Reminders	Any Data	Complete	Accurate
Only		Data	Data
• 2012 data	 2013 data 2015	 2014 data 2015	 2015/16 data 2016/17
	enforcement	enforcement	enforcement

Thank You!



Contact the DOEE Benchmarking Help Center:

Website: http://doee.dc.gov

Email: info.benchmark@dc.gov

Phone: (202) 671-3300

Twitter: <u>@DOEE DC</u>

Brandon Conheim, PE, CEM, LEED-AP DC Sustainable Energy Utility (DCSEU)

DC SUSTAINABLE ENERGY UTILITY

Brandon Conheim, PE, CEM, LEED-AP Account Manager, CRE & Rick Fleury Trade Ally Manager

January 17th & 24th, 2018

AGENDA

- DCSEU Overview
- Program Overview
 - Available rebates & incentives
 - Available support resources
 - Step-by-step process for applying and estimated timeline

What Is the DC Sustainable Energy Utility?

- Technical Assistance and Rebates for District Residential, Commercial and Institutional Customers
- Performance-Based Goals:
 - -1% Energy Reduction in the District
 - Create Green Jobs
 - Provide Support to Low-Income Communities

Working with the DCSEU

Self Service

- Instant Rebates: Lighting
- Business Energy Rebates: Lighting, HVAC, Refrigeration, Food Service Equipment
- Value: Up to \$50,000 in rebates per fiscal (per client site)

Custom Service

- Energy Management Support: Assistance with custom analysis, incentives, obtaining project financing
- Value: Varies by project; typically capped at 50% of project cost

Income Qualified Efficiency Fund

- Value: Project management, higher incentives,
 - Low-Income Communities can be classified as Multifamily Buildings, Clinics, or Shelters that serve low-income households
 - Must use a DCSEU Qualified Contractor for work performed

No-Cost Technical Support

IDENTIFYING OPPORTUNITIES

Site walkthroughs

Capital planning assistance

No-cost technical assistance

Interval data analysis

Peer-to-peer information exchange

New technology seminars

FINDING SOLUTIONS

Project planning & prioritization

Unbiased review of vendor quotes

Data logging baseline energy usage

Guidance on operations and maintenance adjustments

PROJECT ANALYSIS

Cash flow and ROI analysis

Post-installation data logging

Project savings regression analysis

CALCULATING IMPACT

Demonstrating value to decision makers

Analysis of reduced operations and maintenance costs

Increased comfort and employee performance

Guidance on PR and marketing opportunities

Rebate Program Overview

	Product Category	Rebates	Standard Rebate	Contact DCSEU
	Interior LEDs	\$3 to \$15	Х	
	Exterior LEDs	\$3 to \$80	х	
Lighting	Controls	\$20 to \$40	Х	
	Screw-Based LED Bulbs	\$3 to \$5	Х	
	Ambient Light Fixtures and LED Tube Lighting	\$2 to \$60	Х	
	Condensing Boiler 75-225 kBtu/hr AFUE >= 90%	\$2.50 per kBtu/hour	Х	
	Condensing Furnaces <225 kBtu/hr AFUE >= 95%	\$2.75 per kBtu/hour	Х	
	Condensing Boiler > 225 kBtu/hr	Custom		Х
Heating and	Variable Frequency Drives (VFDs) > 15hp	Custom*		Х
Ventilation	Demand Controlled Ventilation	Custom*		Х
	Chillers	Custom**		Х
	Steam Trap Replacement	Custom		Х
	Heat Pumps	Custom***		Х
	ENERGY STAR [®] Reach-in Refrigerators up to 80 cubic feet	\$75 to \$225	Х	
Refrigeration	ENERGY STAR Freezers up to 80 cubic feet	\$100 to \$350	Х	
	ECM Motors for Walk-in Coolers and Freezers	Custom		Х
	Steam Cooker	\$750 (gas) / \$400 (electric)	Х	
	Hot Food Holding Cabinet (electric)	\$300	Х	
Food Service	Combination Oven	\$750 (gas) / \$600 (electric)	х	
Equipment	Convection Oven (electric)	\$225	х	
	Griddle	\$300 (gas) / \$250 (electric)	Х	
	Fryer	\$500 (gas) / \$150 (electric)	Х	
	Spray Rinse Valve (<= 1.6gpm)	\$40	Х	

Custom Rebate Process

- 1. Provide DCSEU with project details:
 - Scope of work; old and new equipment specs; utility data; and answer additional questions
- 2. DCSEU engineer calculates or verifies estimated energy savings:
 - Retrofit savings = new equipment vs. old equipment
 - Market Opp. savings = new equipment vs. minimum code
 - New construction
 - Old equipment beyond ASHRAE life expectancy
- 3. DCSEU provides Incentive Agreement for signature
- 4. DCSEU conducts visual inspection
- 5. Check mailed within 4 6 weeks

Energy Efficiency First-Steps

- LED Lighting
 - Quick payback: approx. 2 10yrs
 - Upstream lighting pilot program with participating distributors
- VFDs
 - 15HP and below, rebate incentive = \$150/HP
 - 15HP+, custom rebate incentives available
- Steam traps
 - Assistance with conducting steam trap survey
 - Rebate incentives for replacing inefficient/failing traps
- Pay-for-Performance (Pilot)
 - Sub-metering/Building Automation Systems
 - Identify problems and opportunities

Additional info available at: www.dcseu.com/for-my-business

CONTACT INFO:

Brandon Conheim - Account Manager, CRE mobile: (202) 420-8317 I email: <u>bconheim@dcseu.com</u>

Rick Fleury - Trade Ally Manager office: (202) 677-4836 I email: <u>rfleury@dcseu.com</u>



Upasana Kaku Urban Ingenuity

DC PACE: Financing Energy, Water, and Infrastructure Upgrades



PACE: A New Use for an Old Concept



<u>DC PACE</u> is the District's clean energy financing program for building upgrades.



<u>**Urban Ingenuity**</u> is the DC PACE program administrator, under contract to DOEE



Philadelphia first used this mechanism for an opt-In Fire District in 1736

About Property Assessed Clean Energy

- Zero Dollars Out-of-Pocket: PACE provides property owners with up to 100% financing for energy and water upgrades at long (15 - 20 year) terms
- **NOI Positive**: Owners realize savings immediately, and use those savings to pay back the cost of the measures through a special assessment that is placed on the property
- Off-Balance Sheet: Extend the capital budget and finance comprehensive projects with potentially off-balance sheet financing PACE is not conventional debt

Commercial PACE Programs Nationwide

- Commercial PACE available in 32 states + DC (19 active programs)
- \$400+ Million funded for 1030 C-PACE projects


What projects can be financed?





Office

Institutional

Properties

- Most commercial properties in the District of Columbia (many MD counties too)
- Both for profit and tax-exempt properties are eligible
- Stand alone / part of larger capital stack
- Must be current on taxes
- Not owned by govt. (but groundlease may be okay)





Multifamily

Industrial

Measures:

- Almost anything tied to an energy or water saving
- Large multi-measure retrofits
- Single-measure like solar panels, boiler replacements, etc.
- Clean energy improvements
- Energy efficiency upgrades (HVAC, lighting, envelope, controls, etc.)
- Water conservation measures
- Rehab or new construction

How it works: DC PACE transaction structure



How PACE Works: Case Study

Customer: Downtown office building with energy-conscious anchor tenant

- High annual energy spend
- Building constructed in 1980s, due for capital upgrades

Challenge: Finance large retrofit project without adding debt

Project: EE, water conservation measures, roof replacement



How PACE Works: Sizing the Financing

ECMS	Cost		
Lighting	\$150,000	Annual Savings	
Water conservation	\$25,000	Energy	\$100,000
HVAC improvements	\$775,000	Water	\$10,000
Roof rehab	\$550,000	0&M	\$60,000
Building controls	\$100,000	Total	\$170,000
Total	\$1,600,000		

PACE
Eligibility

Savings can offset annual payments up to \$170,000 That finances up to \$1,950,000 (20 year term)

How PACE Works: Project Cash Flow

Project Basics

- PACE Eligibility: Up to \$1,950,000
- Actual Project Size: \$1,600,000
- Annual PACE Payments: \$140,000
- Improved building performance, lower operating costs, and improved NOI for owner
- PACE includes cost of structural improvements, key infrastructure upgrades with no out-of-pocket cost

Annual Cash Flow				
Utility Savings	\$110,000			
O&M Savings	\$60,000			
Total Savings	\$170,000			
PACE Payments	-\$140,000			
Net Cash Flow	\$30,000			
\$600K net cashflow over 20 years				

Note: Project financials have been simplified for illustrative purposes.

How PACE Works: Economic Case

	Self-Funded	PACE
Investment by Property Owner	\$1,600,000	\$0.00
Annual Utility Savings	\$170,000	\$170,000
Annual PACE Payment	\$0.00	\$(140,000)
Net Benefit Year 1	\$(1,430,000)	\$30,000
Annual Net Benefit Years 2-20	\$170,000	\$30,000
5-year NPV of Cash Flows (@ 6% discount rate)	\$ <mark>(793,000)</mark>	\$136,000
10-year NPV of Cash Flows (@ 6% discount rate)	\$ <mark>(2</mark> 58,000)	\$221,000
5-year IRR	-18%	Infinite
10-year IRR	1%	Infinite

PACE increases NOI & property value with Zero dollars out-of- pocket for the owner

Note: Project financials have been simplified for illustrative purposes.

Some Recent PACE Projects



DC PACE Process



Thanks!



DC PACE Program Administrator

Upasana Kaku

www.urbaningenuity.com 202-796-8925 ukaku@urbaningenuity.com



Lauren Linville Watershed Protection DOEE









DC's RiverSmart Programs

Green infrastructure incentives

- Provides financial and technical incentives to help District property owners install green infrastructure
- Some offer a site evaluation and up-front funding; others provide rebates or discounts after projects are installed
- Incentives cannot be used to meet regulatory requirements

DC's RiverSmart Programs







Other related programs:

- RiverSmart Homes
- RiverSmart Schools
- RiverSmart Rewards
- RiverSmart
 Educational Boat
 Tours
- Stormwater
 Retention Credit
 Trading Program



- Reduce quantity and improve quality of stormwater runoff
- Encourage community watershed engagement
- Recharge groundwater
- Increase habitat diversity
- Promote conservation

Riversmart REbates

<u>Eligibility</u>: multi-family unit buildings, commercial buildings, houses of worship & non-profit institutions







Rebates

- All private property types welcome – even commercial
- \$2/gallon rebate for rain barrels/cisterns
- Up to \$100 per tree
- \$3/sq. ft. of treatment area for rain gardens
- \$10/sq. ft. for pavers
- \$5/sq. ft. for re-vegetation

Comm

<u>Eligibility</u>: houses of worship & nonprofit institutions

unities

Design/Build

- Limited to houses of worship and non-profit institutions
- Will pay entire cost of project
- Includes significant education and outreach requirements



Riversmart Rooftops

\$10/sq. ft. rebate city-wide; \$15/sq. ft. rebate in priority watersheds

No maximum on size of projects

Funds available to defray cost of a structural assessment for buildings with a footprint of 2,500 sq. ft. or less

<u>Eligibility</u>: all properties of all sizes, including residential, commercial, and institutional











Questions?

END