From:	Smith, Monica
To:	Martin, John; Brescia, Nicolas; Mason, Steve; Foster, Althea
Subject:	FW: Hurricane Harvey: Landill Observation Checklist/ Air Monitoring Plans
Date:	Friday, September 08, 2017 6:05:03 PM
Attachments:	Landfill Oversight document.docx EDSCloseoutChecklist_5.1.14.docx EDSInitialEvalChecklist_52714.docx EDSOversightAssmentChecklist_5.1.14.docx DisasterResponsePlan_ R04_06082016.docx Debris Management Plan 5 24 17.docx Debris Oversight Guidance Document 2017.docx

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From: Smith, Monica
Sent: Friday, September 08, 2017 1:25 PM
To: Vargo, Steve ; Lisa Price ; Craig Carroll (carroll.craig@epa.gov) ; Althea Foster ; Rauscher, Jon
Subject: FW: Hurricane Harvey: Landill Observation Checklist/ Air Monitoring Plans

From: Moore, Gary
Sent: Friday, September 08, 2017 12:52 PM
To: Smith, Monica <smith.monica@epa.gov>
Subject: FW: Hurricane Harvey: Landill Observation Checklist/ Air Monitoring Plans

Monica:

I got these from LDEQ. The checklists may or may not be useful. I am sure TCEQ may have something similar.

Thanks

Gary Moore

From: Daniel Lambert [mailto:Daniel.Lambert@LA.GOV]
Sent: Friday, September 08, 2017 12:06 PM
To: Moore, Gary <Moore.Gary@epa.gov>
Subject: RE: Hurricane Harvey: Landill Observation Checklist/ Air Monitoring Plans

Here's a little light reading for you that may help. We don't have a specific form for air monitoring at landfills.

From: Moore, Gary [mailto:Moore.Gary@epa.gov]
Sent: Friday, September 08, 2017 11:12 AM
To: Daniel Lambert
Subject: Hurricane Harvey: Landill Observation Checklist/ Air Monitoring Plans

Daniel:

Can you tell me if you guys have a template for landfill observations and landfill air monitoring?

Thanks

Gary W. Moore (6SF-ER)
Federal On-Scene Coordinator
U.S EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Cell: 214.789.1627
moore.gary@epa.gov

ATTACHMENT G

LANDFILL ASSESSMENT GUIDANCE

Assessment Procedures

The objective of the landfill assessments is to ensure first that no unauthorized waste is entering the landfill and the landfill is properly handling the unauthorized waste removed from the landfill, and secondly the landfill is operating according to their permit or Interim Operational Plan.

Below is a series of bullets to help inspectors conduct their assessments.

- Enter site, check-in at the office. If office is closed, see the site manager to log on-site.
- Ask to be introduced to other regulatory oversight personnel (i.e., FEMA, EPA, etc…) that are on site, if applicable.
- Duties to perform during the assessment
    - Monitor what is entering the facility. (see List of Unauthorized Wastes)
    - Review operations logs (waste received, removal of unauthorized waste manifests, "cover" logs). The list of records is found in Section C of the checklist.
    - Periodically, post yourself at the observation tower at the entrance and watch the staff perform their load inspection functions and what is visible in each truckload. Document if unauthorized waste is observed and landfills reaction to waste. Also, document if loads are rejected and "why" they were rejected. If loads are rejected, document information about the contractor, truck number, etc. This information will help determine if a pattern of sending unauthorized waste for a particular contractor is forming.
    - Monitor material that is being dumped on the landfill and make observations concerning unauthorized waste.
    - Walk near the dumping area to inspect what is lying on the ground (see safety concerns at end of document regarding traffic).
    - Complete a 214 daily.
- Report any unauthorized waste to your escort or site supervisor so that it may be removed for proper disposal.
    - If unauthorized waste is not removed from the landfill promptly, report it to the site manager.
    - Document concerns noted and any action taken by the staff on the Field Interview Form (FIF) and on the 214.
    - Take photographs as needed to document any areas of concern noted.
    - Report any uncorrected concerns to Team Leader.
- Report fires and other concerns requiring immediate action to the SPOC at (225) 219-3640 and Team Leader.
- At the end of the day if areas of concerns are noted, have the site manager sign/initial the FIF, leave him the first yellow copy of the signed form, and retain the other copies for the files.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
EMERGENCY DEBRIS SITE CLOSEOUT CHECKLIST

Facility Name:	**Arrival Time:**
Agency Interest Number:	**Departure Time:**
Parish:	
Address/Location:	
Debris Site Type (check all that apply):	

[ ] Staging	[ ] Vegetative debris [ ] Woodwaste [ ] Other _____	[ ] C&D debris [ ] Electronic waste	[ ] White Goods [ ] Tires	[ ] Metals [ ] Vessels/Vehicles	[ ] HHW [ ] Orphan drums
[ ] Chipping & grinding	[ ] Vegetative debris [ ] Woodwaste	[ ] Other _____	**[ ] Composting**	[ ] Vegetative debris [ ] Other _____	
[ ] Burning	[ ] Vegetative debris [ ] Other _____		**[ ] Disposal**	[ ] C&D debris [ ] Other _____	

Is there any debris remaining at the location? If yes, list _____	**[ ] Yes**	**[ ] No**
Are there any recyclable items remaining at the location? If yes, list _____	**[ ] Yes**	**[ ] No**
Are there any ash piles remaining at the location?	**[ ] Yes**	**[ ] No**
Was ash land applied on-site (from your observations)?	**[ ] Yes**	**[ ] No**
Was the site an approved Temporary C/D Disposal site?	**[ ] Yes**	**[ ] No**
If yes, was it closed in accordance with the Interim Operational Plan?	**[ ] Yes**	**[ ] No**
Can the site be recommended for final disengagement and verified as being properly closed?	**[ ] Yes**	**[ ] No**

Comments:

_____ _____

DEQ Site Evaluator **Date**

EMERGENCY DEBRIS SITE EVALUATION

Date:	**Arrival Time:**	**Departure Time:**
Site Name:		**AI #:**
Debris Site Contact:	**Title:**	**Phone:**

Evaluation Type: ☐ Pre-Approved Debris Site ☐ Temporary Debris Site (requested at onset of emergency)

Site Status: ☐ New ☐ Previously-approved ☐ Change in activity or modification

Requested Activities

Staging/ Segregation:	☐ C&D debris ☐ woodwaste	☐ metals ☐ tires	☐ white goods ☐ electronic waste ☐ vegetative debris	**Composting:**	☐ vegetative debris
				Chipping & Grinding:	☐ vegetative debris
Preparation:	☐ white goods	**Burning:**	☐ vegetative debris (open)	☐ vegetative debris (air curtain destructor)	

☐ **Other (Include debris types & associated activities)** _____

Verification of Site Location by Inspector

Verification of Physical Location: The city name must be for the closest city in the same parish as the requested site. If the site does not have a 911 address, detailed directions must be provided from the nearest town/city and indicate specific street, road, highway, interstate, and/or location names. Indicate any landmarks and/or mile markers, if necessary.

Address: **City/Zip Code:** **Parish:**

Detailed directions:

GPS Verification for Site Entrance:	LAT:	LONG:
GPS Verification for Debris Activities:	LAT:	LONG:

Site Criteria

1. If this site has previously been evaluated, since the last evaluation have there been any changes at the site and/or surrounding area? If yes, explain.	☐ Yes ☐ No ☐ N/A
2. Are there any obvious environmental issues associated with the site such as potable water wells, archaeological/historical deposits, endangered species, wetlands or flooding? If yes, explain.	☐ Yes ☐ No
3. Are there nearby residences and/or businesses that will be inconvenienced or adversely affected by use of the site? If yes, explain.	☐ Yes ☐ No
4. Are there any site safety issues? (e.g., power lines, pipelines) If yes, explain.	☐ Yes ☐ No
5. Are any erosion and/or rainwater runoff control measures needed at the site? If yes, explain.	☐ Yes ☐ No ☐ N/A
6. Is additional containment necessary for any wastes that have a potential for leaking? (e.g., white goods leaking Freon) If yes, explain.	☐ Yes ☐ No ☐ N/A
7. Are the roadways and entrance to the site suitable for trucks hauling debris? If no, explain.	☐ Yes ☐ No
8. Is the site fully accessible to fire personnel and equipment? If no, explain.	☐ Yes ☐ No
9. Is the size of the site sufficient for its intended use? If no, explain.	☐ Yes ☐ No
10. Is the general terrain of the site suitable for the proposed activities? If no, explain.	☐ Yes ☐ No
11. Are chipping & grinding activities more than 300 feet to residences, businesses, schools, hospitals, clinics, and roads? Are burning activities more than 1,000 feet? If no, explain.	☐ Yes ☐ No ☐ N/A
11. Are debris activities more than 100 feet to property boundaries and on-site structures? If no, explain.	☐ Yes ☐ No
12. Are debris activities more than 100 feet to nearby surface waters? If no, explain and provide the name of the nearest surface water, if it is named.	☐ Yes ☐ No
13. Are debris activities more than 10,000 feet to the nearest airport? If no, explain and provide the name of the airport.	☐ Yes ☐ No
14. Are there specific conditions necessary to ensure protection of surrounding human health and environment, such as wind direction, waivers, or notifications? If yes, explain.	☐ Yes ☐ No

Comments: (Explain any answers from above. Include any other pertinent information regarding the suitability of the site for its requested activity. Include justification for denial or specific conditions needed to be added to the approval.)
Attach additional comment page, if needed.

Inspector Recommendation: ☐ Site is recommended for ALL activities ☐ Site is NOT recommended for any activities
☐ Site is recommended for SOME activities (see comments) ☐ Site is recommended with conditions (see comments)

Inspector Name (PRINT): **Signature:**

EMERGENCY DEBRIS SITE EVALUATION		
Date:	**Arrival Time:**	**Departure Time:**
Site Name:		**AI #:**
Additional Comments:		

ATTACHMENT 3

Photograph Template

Facility Name:		AI#:
Location:		Parish:
Date:	Reason:	Photographer:

Photo#: 1 of	Time:
Description:	

Photo #: 2 of	Time:
Description:	

Photo #: 3 of	Time:
Description:	

Emergency Debris Site
Assessment Checklist

AI No.: _____ Alternate ID No.: _____

Assessment Date: _____ Arrival Time: _____

Incident Name: _____ Departure Time: _____

Site Name: _____

Physical Location: _____

_____ LA ____ Parish: _____
(City) (State)

GPS coordinates Latitude: _____ Longitude: _____

Facility Representative/Title: _____

Representative Telephone No.: _____

LDEQ Lead Inspector: _____

Other Inspectors: _____

ASSESSMENT INFORMATION

Please use the Additional Comments Section or FIF to further explain any Observations of Concern and include photographs for these observations.

Section A. General Site Information				
1. Does the site have an approval letter from LDEQ for activities at the site? Approval Date:				☐ Yes ☐ No
2. What activities and debris have been approved for the site? (Check the appropriate activities)				
☐ **Staging**	☐ Vegetative debris ☐ Woodwaste ☐ Other _____	☐ C&D debris ☐ Electronic waste ☐ White Goods	☐ Tires ☐ Metals	☐ HHW ☐ Orphan drums ☐ Vessels/Vehicles
☐ **Chipping & grinding**	☐ Vegetative debris ☐ Woodwaste	☐ Other _____	☐ **Composting**	☐ Vegetative debris ☐ Other _____
☐ **Burning**	☐ Vegetative debris ☐ Other _____		☐ **Disposal**	☐ C&D debris ☐ Other _____
3. Is the site active? If No, what is the current site status?				☐ Yes ☐ No
a. The site was not used for hurricane debris.				☐ Yes ☐ No ☐ N/A
b. The site was used for hurricane debris and all debris was removed.				☐ Yes ☐ No ☐ N/A
c. The site was used but is not active.				☐ Yes ☐ No ☐ N/A
d. Other (explain):				☐ Yes ☐ No ☐ N/A
4. Has the local government provided the contractor operating/managing the site with a copy of the Debris Management Plan?				☐ Yes ☐ No ☐ N/A
Section B. Debris Site Specific Conditions				
1. Has the site complied with the conditions of the Temporary Debris Site Authorization, the Pre-approved Emergency Debris Site Authorization and/or other approvals set by LDEQ? Complete Section C to determine compliance with IOP.				☐ Yes ☐ No ☐ N/A
2. Is the site controlled to prevent unauthorized dumping and scavenging?				☐ Yes ☐ No ☐ N/A
3. Does the site maintain adequate number of spotters to identify and segregate waste types for appropriate management?				☐ Yes ☐ No ☐ N/A
Vegetative and Woodwaste Staging, Composting, and/or Chipping & Grinding Sites				
5. Are windrows with a height of 20 ft and a base width of less than 30 ft maintained to minimize the risks of spontaneous combustion?				☐ Yes ☐ No ☐ N/A
6. Are there currently signs of spontaneous combustions occurring at the site?				☐ Yes ☐ No ☐ N/A

7. Are debris piles located away from wooded areas, power lines, and structures?	☐ Yes ☐ No ☐ N/A
Vegetative Burn Sites	
8. Is the burning only occurring between the hours of 8:00 am and 5:00 pm?	☐ Yes ☐ No ☐ N/A
9. If burning is occurring, is there an operator on site?	☐ Yes ☐ No ☐ N/A
10. Have the local fire-fighting organizations been advised of burning?	☐ Yes ☐ No ☐ N/A
11. Is the burning being conducted at least one thousand (1000) feet (305 meters) from any inhabited dwelling?	☐ Yes ☐ No ☐ N/A
12. Is the burning being controlled so that the smoke, suspended particle matter, etc. does not cross a public road and create a traffic hazard?	☐ Yes ☐ No ☐ N/A
13. Is dirt in the material being minimized during the burning process?	☐ Yes ☐ No ☐ N/A
14. Is the facility making sure that unauthorized material such as heavy oils, asphaltic materials, rubber items, etc are not being burned?	☐ Yes ☐ No ☐ N/A
15. At the time of the assessment, are the prevailing winds carrying the smoke away from any nearby towns, city, etc?	☐ Yes ☐ No ☐ N/A
16. If the site is using an Air Curtain Destructor or Pit Burner, is it being operated according to manufacturer's inspection or an LDEQ approved plan?	☐ Yes ☐ No ☐ N/A
17. Is there any evidence that unauthorized debris has been burned?	☐ Yes ☐ No ☐ N/A
Vegetative Chips/Ash Deposition	
18. Are any chip/ash piles remaining at site?	☐ Yes ☐ No ☐ N/A
19. Has the chips/ash been [a] applied to the land or [b] used as a soil amendment? (Circle appropriate use)	☐ Yes ☐ No ☐ N/A
20. If the chips/ash has been land applied, was it applied to meet the requirements of the Debris Management Plan?	☐ Yes ☐ No ☐ N/A
19. If the chips/ash was not land applied, where was it disposed?	
20. Is there any analytical data for the ash?	☐ Yes ☐ No ☐ N/A
21. Does the site have a BMP from the Dept. of Agriculture and Forestry in place to manage any chips left on site?	☐ Yes ☐ No ☐ N/A
C&D Staging and Separation Sites	
22. Is there any processing of C&D debris occurring (outside of separation)?	☐ Yes ☐ No ☐ N/A
23. Are piles with a height of 20 ft and a base width of less than 30 ft being maintained?	☐ Yes ☐ No ☐ N/A
Electronic Waste Staging and Separation Sites	
24. Is there any processing of electronic waste occurring (outside of separation)?	☐ Yes ☐ No ☐ N/A
25. Is the electronic waste covered, to the best extent possible, from weather?	☐ Yes ☐ No ☐ N/A
26. Is the electronic waste staged on asphalt, concrete, plastic liners, or other surface to protect the soil and groundwater from potential leaks?	☐ Yes ☐ No ☐ N/A
27. Are piles with a height of no more than 6 ft being maintained?	☐ Yes ☐ No ☐ N/A
White Goods Staging and Segregation Sites	
28. Is there any processing of white goods occurring (outside of segregation of unauthorized debris, such as food or refrigerants)?	☐ Yes ☐ No ☐ N/A
29. If the refrigerants are being removed, is an EPA certified refrigeration technician removing the refrigerant?	☐ Yes ☐ No ☐ N/A
30. Are the white goods being staged on plastic liners and contained within berms to prevent contamination of the soil?	☐ Yes ☐ No ☐ N/A
31. Are there any vector or odor problems?	☐ Yes ☐ No ☐ N/A
32. How is the local government handling the white goods? (White goods may not be landfilled.)	
Tires Staging and Separation Sites	
33. Is there any processing of tires occurring (outside of separation)?	☐ Yes ☐ No ☐ N/A
34. Are the tires covered, to the best extent possible, from weather?	☐ Yes ☐ No ☐ N/A
35. Are tire piles with a height of no more than 10 feet in height, 20 feet in width, and 200 feet in length with piles separated by a minimum width of 50 feet?	☐ Yes ☐ No ☐ N/A
Metals Staging and Separation Sites	
36. Is there any processing of metals occurring (outside of separation)?	☐ Yes ☐ No ☐ N/A
37. Are the metals covered, to the best extent possible, from weather?	☐ Yes ☐ No ☐ N/A
38. Are the metals staged on asphalt, concrete, plastic liners, or other surface to protect the soil and groundwater from potential leaks?	☐ Yes ☐ No ☐ N/A

39. Are piles with a height of no more than 6 ft being maintained?	☐ Yes ☐ No ☐ N/A
Marsh Grass Sites	
40. Is contaminated marsh grass being sent to a Type I landfill?	☐ Yes ☐ No ☐ N/A
41. How is uncontaminated marsh grass being handled?	
Section C. Debris Contaminated with Oil or Hazardous Waste	
1. Is hurricane generated debris contaminated with oil being disposed of in a Type I Solid Waste Landfill?	☐ Yes ☐ No ☐ N/A
2. Is hurricane generated debris contaminated with hazardous waste being burned? If yes, please notify supervisor immediately.	☐ Yes ☐ No ☐ N/A
3. Are creosote treated telephone poles, railroad crossties, or treated wood chips being disposed of in a Type I Solid Waste facility?	☐ Yes ☐ No ☐ N/A
4. Does the facility have documentation, manifests, etc. to substantiate any or all of the above prohibitions?	☐ Yes ☐ No ☐ N/A
Additional Comments:	

Louisiana Department of Environmental Quality (LDEQ)

Natural Disaster and Catastrophic Event Response Plan

June 6, 2016
Revision 4

Interim Final

Approved by: _____ Date: _____

Chuck Carr Brown, Ph.D., Secretary

Document Owners: Natural Disaster and Catastrophic Event Task Force
LDEQ Staff

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Document Review and Revision Record

Note: Actions older than 5 years may be removed from this record

Approval Date	Revision No.	Record of Activity
7/2012	0	Initial document approval.
8/7/2013	1	Review and extensive revision to content and format.
6/5/2014	2	Review, update attachments as necessary, and inclusion of DNR IT guidelines.
6/23/2015	3	Review plan and update attachments as necessary, and inclusion of DOA IT guidelines.
6/06/2016	4	Review plan and update attachments as necessary and include organizational responsibilities

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I. Applicability/Purpose

Each year the Louisiana Department of Environmental Quality (LDEQ) will implement a timeline to ensure full readiness for response to natural disasters and catastrophic events (Event) that impacts the State of Louisiana. Although the most prominent event for the State of Louisiana is a large scale hurricane event, which this plan focuses on, it is flexible to encompass responses to other defined events, such as, severe weather (flooding or tornadoes), and man-made disasters e.g. train derailments, oil field production well blow-outs. This document outlines how the Office of the Secretary (OSEC), Office of Environmental Services (OES), Office of Environmental Compliance (OEC), Office of Management and Finance (OMF) will prepare and carry out their portions of the Louisiana Department of Environmental Quality (LDEQ) Natural Disaster and Catastrophic Event Response Plan (the Plan) during an event.

The Department will establish an Incident Management Team (IMT) for the Event that will determine the response level in cooperation with local state and federal partners to assure the environmental and public health needs of the State of Louisiana are addressed. Prior to an Event, LDEQ will establish an Incident Command that will implement LDEQ's assigned tasks within each Emergency Support Function (ESF) as defined in the Louisiana State Emergency Operations Plan. All decisions in relation to carrying out the emergency support functions will be routed through the Incident Command to streamline the Event's response process and ensure efficient use of resources.

An H-hour timeline for hurricane only response actions internal to the Department is included in Section IV. It provides a rolling timeframe for key actions that will be implemented by the Department. H-hour is defined as the time when tropical force winds will begin impacting the coast of Louisiana.

In the event that LDEQ loses critical functions due to the event (i.e. a collapsed or flooded building, the LDEQ Continuity of Operations Plan will be implemented.

A. Plan Updates and Revisions

Annually, members of the Event Task Force (ETF) will distribute the Plan to the various entities, usually Administrators or other assigned staff as appropriate, for review and updates. The assigned parties will review the Plan and make any updates or comments to the documents. The changes/comments will be reviewed by the ETF for inclusion into the plan. The ETF will seek advice or approval from the Executive Staff regarding any changes, comments, or questions received regarding the Plan.

Simultaneously, the ETF will distribute the various attachments, which support the Plan, to their respective Document Owner(s). The Document Owner(s) will review the attachments and make any necessary updates. The Document Owners will be

responsible for getting approvals from Administrators or their designee for general document approval or suggested changes. The document shall be in its final format prior to being returned to the ETF for inclusion into the Plan. The ETF will not be making any further changes to the document unless requested by the document owner. Upon receipt by the ETF, the document will be converted to .pdf for inclusion into the Plan.

Once all the information is gathered, the Plan is compiled and sent to The Secretary or their designee for review and approval. Once the Plan, has been approved, the Plan with attachments will be posted on DEQ's Intranet Site, Hurricane Response IMT Information.

DEQ's Intranet Hurricane Response IMT Information page can be accessed by using the Personnel ID number ("P" number) and network password.

II. General Comments

Each Office of the Department will play a key role in carrying out the management of the Event response.

A. Office of the Secretary

1. <u>Executive Staff</u>

- Represents the ultimate Departmental authority for the incident response.
- Secretary or their designee authorizes the issuance of an Emergency Declaration and Administrative Order.
- Serve as members of the Incident Management Team.
- Advise the Incident Command on the scope of the incident.
- Meet with state and federal partners regarding the incident response.
- Staff or designee represents DEQ at the Office of the Governor's Unified Incident Command Meetings.

2. <u>Small Business and Community Assistance Program (SBCAP)</u>

- Annually, the SBCAP may be asked to assist the OEC Assessment Division with review, updating and compilation of the Parish Resource Book http://www.deq.louisiana.gov/portal/NEWS/NaturalCatastrophicDisasterResponse/ParishResourceBook.aspx

- After the review has been completed, the Parish Liaisons will meet with parish emergency planning officials to review any changes in the plan and give the parish an updated version of the book. Anticipated completion of parish meetings will be around June 30th. A list of parish liaisons and their assigned parishes are included in Attachment # 1.

- The Liaison will request a signature receipt upon delivery of the Resource Book to the Parish. The Liaison will submit the signature page to EDMS to be placed under the Outreach folder for that Parish.

- The Liaison will create a Tempo Outreach task bar in TEMPO under the Parish AI#. [small business assistance grey bar, government assistance]

- Post-Event. Members of SBCAP will serve as parish liaison to the parish Emergency Operations Centers to help with debris or hazardous material issues that may arise. The parish liaison will contact the parish EOC to receive information on impacted area, infra-structure (waste water) needs, and debris site activation information.

3. Legal Division

- Advises the Secretary and/or his designee regarding the Emergency Declaration and Administrative Orders for the event.

- Develops and amends the Emergency Declaration and Administrative Orders and ensuring posting to the LDEQ website (Attachment # 2).

- Advises the Incident Command on statutes, regulations, or any legal issues that may arise as part of the response, i.e. right of entry; private property, etc.

- Serves as part of the Parish Liaison Teams in several regions.

B. Office of Management and Finances

The Office of Management and Finance personnel will support the response effort to ensure that resource cost expenditures are properly documented over the duration of the response and debris management phases for the following:

1. Undersecretary Administrative Staff

- Sends out an email in June to employees reminding them to update their addresses, phone numbers and emergency contact information in the LEO system.

- PPM 0020-06, Disaster Reference/Contact Information policy is updated annually by the Undersecretary Administrative Staff.

- Provides office closure and other information that will affect employees related to the Event.

- All data lines activated in rooms C102 (Baton Rouge Room), C103 (Manchac Room), and C104 (Mobile Room

- Ensure hardline phones jacks activated

- Fax Line

- Submit a request to OTM for a teleconference Line in Galvez Conference Room C102 (Baton Rouge Room)

2. Financial Services

- DEQ Procurement Card Administrator raises the p-card limits for designated emergency purchasers when necessary. Accountant Administrator is back-up for this function.

- Establishes a WBS Element code for the Event and issues to Department personnel for tracking activity expenditures (timesheet, 214, invoices, etc). If the Governor issues a Declaration of State Emergency for the event, HR will create an additional Functional Area code for tracking. Sends the codes to all employees.

- Receives and audits original timesheets, 214s and k-time forms. (Duration of Response and Debris Management).

- Prepares cost reimbursement requests and submits them to GOSHEP along with required backup documentation. (Duration of Response and Debris Management)

- Responds to requests for cost information from DEQ Executive Staff, GOHSEP, DPS or DOA as necessary.

- DEQ's Procurement/Contract Management Program Director and Procurement Card Administrator will ensure that the emergency purchasing rules are followed at all times and that appropriate spending limits are available on the employee's LaCarte P-Card.

- DEQ's Safety Coordinator will purchase department wide use emergency items as necessary.

3. Human Resources (DOA**)**

- HR may share task with Undersecretary Administrative Staff to send out an email annually to employees reminding them to update their addresses, phone numbers and emergency contact information in the LEO system.

- Available to communicate with staff on personnel matters contingent on the nature of the disaster.

- Evaluate overtime and the possible need to change work hours of staff to 24/7, etc.

- Answer any work/benefit related questions and/or send any necessary information out to employees.

4. IT Technical Support (DOA-OTS)

In the event that LDEQ activates an ICC for an environmental response, technical support services from IT, GIS, or OSB will be needed to facilitate rapid startup and efficient operation of the ICC throughout the incident. If an ICC is activated at the DEQ Headquarters building, the Galvez conference rooms C102 (Baton Rouge), C103 (Manchac), and C104 (Mobile) have been prioritized for establishing the ICC.

The following support items have been initially identified for the HQ ICC in order to have a functioning wireless and hardwire network capabilities for command staffs communications, computer and printing needs:

- **IT Support for Incident Command Center (ICC)**

  - Set up of copier and printers (color and B&W)
  - Radio and other communications equipment
  - Wireless Router (including for Visiting Partners)
  - Mapping Services and Support (GIS, ArcGIS).
  - Reserve of additional computers available
  - Access to IT personnel for software and hardware needs and troubleshooting

Depending on the scale of the event, an ICC could be established or relocated to a regional office which would require similar needs noted above.

- **IT Support for Assessment Division (AD)**

During response events such as hurricanes, hazardous mat incident, oil spills, etc., the AD will require IT support for the following on an as needed basis:

- Mobile Command Center satellite, radio and other communications equipment. 24/7
- Single Point of Contact (LDEQ SPOC) support of database and computers [Cubicle 821-55; Staff Cubicles 54; 53; 52] SPOC smart phone 24/ 7
- Radiological Emergency Preparedness & Response (REPR): IP address for Inform, blue tooth, Wi-Fi, Radio, fax and printer technical support for Communications Cube 821-56 impacting River Bend, Grand Gulf and Waterford 3 Nuclear Power Plant. GIS Support, firewall support [Staff Cubicles 821-39, 37, 36, 35, 57]; Technical support for Offsite mobilization capabilities utilizing mobile and handheld radio interoperability and multiagency/multistate communications. 24/7
- Emergency Responders statewide (8) and all Regional Offices; ARO, SERO, CRO, NERO, SWRO, NWRO; BLRO; KCRO rotating smart phone support. To receive and send email notifications from LSP HazMat Hotline. Mobile radio communication equipment in all emergency responder's vehicles. 24/7
- Emergency Response boat radio communication equipment support.

5. Records Management

- Maintain the Guidelines for Disaster Related Records (Attachment # 3).
- Determines if the EDMS and shared folders are functional.

C. Office of Environmental Services

The Office of Environmental Services (OES) personnel in the Water Permits, Waste Permits, Air Permits, and Permit Support Services Divisions shall follow the procedures outlined in this plan as applicable to their job functions for preparation and readiness in the event of a natural disaster or catastrophic threat.

In the event an emergency is declared and the LDEQ incident command system is implemented, the OES Divisions will support the response by carrying out following functions:

1. Waste Permits Division

- Waste Permits Division performs oversight functions for emergency debris sites and landfills.

- Waste Permits Division will update and maintain the LDEQ Debris Management Plan (Attachment # 4) and the Pre-Approved Emergency Debris Site List for posting on the LDEQ website and within the Parish Liaison Books.

2. Water Permits Division

- Water Permits Division shall establish the Phone Bank Task Force which will be responsible for contacting applicable facilities via telephone to determine facility status and ascertain specific needs as determined by the Incident Command. The Phone Bank Task Force will implement these actions as defined in the Phone Bank Assessment Plan (Attachment # 5).

3. Public Participation and Permit Support Division

- Shall ensure annually that the Emergency Declaration and Administrative Order (EDAO) template is kept current with regulatory or procedural changes.

- If requested by Legal, P3SD will assist with the initiation and amendments of the EDAO.

- Provide the event Agency Interest~~ed~~ Number(s).

4. Air Permits Division

- Shall assist with these functions and others as outlined in the emergency plan.

- Will designate individuals to the Fuel Waiver Team. DEQ's Fuel Waiver Team will participate in duties as outlined in Section III.C of this plan. Air Field Services staff supports APD with the task.

D. Office of Environmental Compliance

The OEC Plan provides a framework to assist with planning, preparation and response, in particular for field operations. OEC personnel in the Assessment, Inspection, Enforcement, and Underground Storage Tank and Remediation (USTR) Divisions shall follow the procedures outlined in the OEC Natural Disaster and Catastrophic Event Preparedness Plan (Attachment # 6) that are applicable to their job functions for preparation and readiness in the event of a natural disaster or catastrophic threat.

1. Enforcement Division

- Primarily responsible for manning the State Emergency Operation Center ESF-10 Desk.

- An Enforcement EOC Coordinator will be assigned to develop and maintain a schedule.

- Staff personnel will follow the State Emergency Operations Center ESF-10 Staffing Instructions (Attachment # 7).

2. Assessment Division

- Initiate the review and updating of the Parish Resource Book (the Book). Coordinate with the SBCAP and the Parish Liaison Team on the distribution of the Book to the parishes.

- Review and update the LDEQ Continuity of Operations Plan. Submit the updated plan to the Secretary for approval and signature. Provide the Governor's Office of Homeland Security and Emergency Preparedness (GOSHEP) with a signed copy upon request.

- Designate individuals to the Fuel Waiver Team. DEQ's Fuel Waiver Team will participate in duties outlined in Section III.C of this plan.

a. Single Point Of Contact (SPOC)

- Primarily responsible for receiving incident information, which includes any spills/releases or complaints, related to the event, logging the information into TEMPO, and directing the incident notification to the proper location for investigation (Attachment # 8).

- Set up and maintain a 24/7 staffing schedule, if requested by Executive Staff/Incident Command.

- Supports EOC with information flow to staff.

- Provide backup support for staff to contact in the event supervisors cannot be reached for notification of location and availability after the Event.

b. Emergency Response and Radiation Sections (ERSD)

Emergency Response Section:

- Teams with the Louisiana State Police (LSP) to conduct Rapid Needs Assessments (RNA) in impacted parishes (Attachment # 9).

- Supports the Incident Command with Operational and Logistic needs.

- Maintains and deploys the Incident Command Post and ER Boat as directed by Incident Command

- Serves as members of the Incident Command Team.
- Responds to Incidents related to the event.

Radiation Section

- Pre and Post Event - Contacts radiological licensees to verify radiological source security in accordance with the SOP for Radiation Licensing Event Response Preparedness (Attachment #10).
- Serves as members of the Incident Command Team

c. Air Field Services Section

- Pre-Event-prepares AAM sites in potentially impacted areas by either powering down or removing equipment (Attachment # 11).
- Post-Event-evaluates AAM sites in impacted areas for damage and re-initialization of sites.
- Monitors air quality post-event for anomalies and reports air quality issues to the Incident Management Team
- Maintains MAML to be deployed by Incident Command for environmental monitoring related to the event.
- Assist Air Permits Division with the drafting of Fuel Waiver request.

3. <u>Inspection Division</u>

- Conducts environmental assessments at industrial and waste water facilities in the impacted areas.
- Assists parishes and/or federal partners with orphan container management.
- Conducts debris oversight assessments which include site evaluation and closure assessments, household hazardous waste collection.
- Serves as members of the Incident Command Team
- Responsible for updating WebEOC and requesting RFTs when necessary
- Serves as Parish Liaison with parish EOCs.

- Respond to incidents (spills/releases and complaints) related to event.
- Supports Louisiana Oil Spill Coordinators Office (LOSCO) and US Coast Guard (USCG) in oil spill response in the coastal zone.

4. Underground Storage Tank and Remediation Services Division

- Conducts environmental assessments at UST and Superfund sites in the impacted areas (Attachment # 12).
- Serves as members of the Incident Command Team.
- Respond to incidents (spills/releases) related to the event.

III. Incident Field Response

Incident Command Teams (A, B, and C) will be established prior to June 1. Department personnel will be utilized to fill the Command and General Staff (C&G) positions on a rotational basis until the conclusion of the event (Attachment # 13). All C&G staff will have the appropriate ICS training related to their position within the Incident Command Staffing. All field response personnel should have the appropriate HAZWOPER and ICS training related to their positions within the incident organizational staffing.

A. Environmental Assessments

Incident Command will oversee the environmental assessments at industrial and waste water facilities in the impacted areas conducted by field response teams. Damage assessments will be conducted within the scope of work defined in the Environmental Assessment Plan (Attachment # 14).

B. Debris Management Teams

Debris Management Teams will perform debris oversight assessments for landfills and emergency debris sites, which include site evaluation, site closure assessments and household hazardous waste collection sites. The teams will conduct the oversight activities at Emergency Debris Sites and Landfills following the Debris Oversight Guidance Document in Attachment # 15.

C. Fuel Waiver(s)

- Review and update protocol by June 1 of each year. The link to the Fuel Team playbook: http://data.dnr.la.gov/lcp/Louisiana%20Fuel%20Team%20Playbook.pdf

- Provide a semi-annual report of registered underground storage tank facilities statewide to supplement the fueling station database.

- The fuel team participants, upon activation by the DNR Fuel Team Coordinator, will provide requested support to the Fuel Team.

- Requests for fuel waivers will be generated in Web EOC. The Fuel Team reviews information and determines if the request is warranted. If warranted, then the Fuel Team makes a declaration that there is a fuel supply shortage.

- An email notification will be sent from the Fuel Team Coordinator to the DEQ Fuel Team representatives for initiation of the RVP fuel waiver on behalf of the State.

- Assessment Division will review the information off of WebEOC and use pertinent data in writing a waiver request letter to EPA. The Request for Fuel Waiver Concerning Gasoline for Louisiana boiler template will be used to generate the RVP fuel waiver request letter. The letter will be forwarded to the Secretary of DEQ for signature.

- The RVP fuel waiver request letter will be submitted to the Administrator of EPA for approval.

- Louisiana Department of Agriculture and Forestry (LDAF) will prepare the State RVP waiver for winter gasoline if one is needed.

IV. LDEQ Hurricane Response H-Hour Timeline

The H-Hour Time line is used in the event of a Hurricane and is activated when a tropical storm enters the Gulf of Mexico.

H-HOUR	GROUP	SUBGROUP	RESPONSE ACTIONS
H-144	**FEMA Region IV**		Plan Starts 6 days before projected landfall
H-120 (if projected path indicates impacts in Louisiana)	**Incident Management Team (IMT)**		Activates and begins discussions
H-120	**Division Administrators**		Essential Employees are notified
H-120	**OMF/DOA-Human Resources**		PPM0020-06 sent to all employees
H-120	**Parish Liaisons**		Initiate contact with Parish OECs or Liaisons

H-HOUR	GROUP	SUBGROUP	RESPONSE ACTIONS
H-96	**DOA-OTS**		Coordinate with DOA-OTS Agency Relationship Manager assigned to DEQ on IT, IS, and GIS needs.
H-96	**OMF**	*Fiscal Services*	Accountant Administrator establishes a WBS Element code for the hurricane event and issue to Department personnel for tracking activity expenditures (timesheet, 214, invoices, etc). If the Governor issues a Declaration of State Emergency for the event, HR will create an additional Functional Area code for tracking response cost at the request of **IMT.**
H-96	**DOA-Human Resources**		Human Resources completes and issues incident specific 214 Unit Log and sends out to Department personnel.
H-96	**All Offices**	*All Offices*	All personnel begin documenting activities on 214 Unit Log form.
H-96	**OEC**	*ERSD*	SPOC 24/7 schedule is requested and verified by ER Manager.
H-96	**OEC**	*Air Analysis (all regions)*	Begin securing all ambient air monitoring (AAM) sites in projected impact area(s). Ensure completion by **H-48**.
H-96	**OEC**	*Air Analysis (all regions)*	SERO air sites designated by Air Assessment HQ will have equipment removed and secured in Baton Rouge at LDAF location (CAT 3 or higher).
H-96	**OEC**	*Air Analysis (all regions)*	Secure any loose items and exterior fixtures at AAM sites that have the potential to become airborne
H-96	**OEC**	*Air Analysis (all regions)*	Site operators will unplug the sites at the service pole and ensure the weather towers are cranked all the way down.
H-96	**IMT**	*Data Management*	Data Management Unit Leader request EPA to create LDEQ event/ incident in Response Manager database. Advise all users to sync and keep synced database on assigned computers.
H-96	**IMT**	***Executive Staff and Incident Commander***	Contact all state and federal ESF-10 partners to discuss Unified Command options (response efforts (oil spill and hazardous materials) and resource availability.
H-72	**IMT**	*Incident Commander(s)*	After consultation with executive staff, activates Incident Command (IC) or Unified Command (UC) with other state and federal partners.
H-72	**OSECR**	*Legal*	Issues initial Emergency Declaration Administrative Order
H-72	**Incident Command**	*Logistics*	Establishes Command Post
H-72	**Incident Command**	*Incident Command & General Staff*	Develop Incident Objectives and Operational Period.
H-72	**Incident Command**	*Logistics*	Secures Wi-Fi's from IT.
H-72	**Incident Command**	*Planning*	Data Management Unit requests share folder and FTP web site are set up on deqshares server.

H-HOUR	GROUP	SUBGROUP	RESPONSE ACTIONS
H-72	**Incident Command**	*Planning*	Data Management Unit prepares SSR (ticket) to submit to P3SD for incident TEMPO compliance view type.
H-72	**Incident Command**	*Planning*	Data Management Unit requests AI number for incident.
H-72	**Incident Command**	*Planning – Situation Unit*	Receive Environmental Assessment Priority Lists and establishes EA universe.
H-72	**Incident Command**	*Logistics*	Verify a back-up communication plan (phones, radios, etc) between the main office and regional staff with the LDEQ-IC when operational.
H-72	**Incident Command**	*Liaison*	If directed by IC, Liaison Officer will begin coordination with Parishes for embedding personnel (PLT) into Parish EOC.
H-72	**OSECR**	*Parish Liaison Team (PLT)*	Directed by Liaison Officer to make contact with Coastal Parishes and the regional offices that will be impacted, provide them with contact information for after landfall and assess any upfront needs.
H-72	**OSECR**	*Parish Liaison Team (PLT)*	Embedded team members will coordinate support activities with Liaison Officer and Regional Branch Director.
H-72	**All Offices**	*All ER and Regional Staff*	Regional offices in potential landfall path initiate OEC hurricane preparation and emergency action plan.
H-72	**All Offices**	*Division Administrators/Designee*	Media Specific facility lists (UST, Superfund, and Radiation) are sent to the Planning Section.
H-72	**OEC**	*Managers*	ER and regional staff in the potential impacted regions are notified to on **READY ALERT** and have packed personal items and clothes for approx. 3-5 day stay.
H-72	**OEC**	*HQ and Regional Offices (as needed based on potential damage predicted)*	Make sure all emergency equipment is functional and up-to-date (laptop, Response Manager, USB, flash drives, GPS, and communications radios).
H-72	**OEC**	*HQ and Regional Offices (as needed based on potential damage predicted)*	Email staff to power down all computer and electrical. All administrative assistants are to power down unattended items.
H-72	**OEC**	*HQ and Regional Offices (as needed based on potential damage predicted)*	Refrigerators and freezers will be emptied of all perishable items prior to departure.
H-72	**OEC**	*OEC Admin*	The OEC Assistant Secretary notifies the DEQ Secretary and the DEQ pilot that the airplanes must be on standby, ready for use after landfall.
H-72	**OEC**	*HQ and Regional Offices (as needed based on potential damage predicted)*	Projected impact region(s) will verify designated staging area.
H-72	**OEC**	*Radiation*	Notify radiological source licenses in potential

H-HOUR	GROUP	SUBGROUP	RESPONSE ACTIONS
			impacted areas.
H-72	**OEC**	*Enforcement*	EOC Coordinator develops and maintains EOC schedule; initiation based on GOHSEP activation of ESF 10.
H-72	**OEC**	*Air Analysis (all Potentially Impacted Regions)*	Verification by LDEQ site operators that all AAM sites in projected impact area(s) are secured according to their plan.
H-50	**OEC**	*Radiation*	Verify radiological sources are removed or secured.
H-48	**Incident Command**	*Planning – Resource Unit*	Begins preparation of 204 templates for Environment Assessment Groups and upload into appropriate folders.
H-48	**Incident Command**	*Planning*	Begins preparation of initial Incident Action Plan (IAP) and issues completed IAP.
H-48	**Incident Command**	*Planning*	Planning Section Coordinates with EPA and Weston regarding loading of Priority Lists into Response Manager. Also coordinate any pre-event questions with EPA and Weston.
H-48	**Incident Command**	*Liaison*	Liaison Coordinates credentials with GOHSEP, Parishes and/or other partners as needed.
H-36	**Incident Command**	*Operations*	Phone Bank to make pre-landfall calls to landfills and refineries according to the Phone Bank Guidance Plan.
H-36	**OEC**	*HQ and Regional Offices (as needed based on potential damage predicted)*	ER and key personnel, identified by regional managers, who are not evacuating will take vehicles home at office closure.
H-24	**ERSD**	*SPOC*	ER Manager notifies IC that SPOC 24/7 coverage has been activated.
H-24	**ALL OFFICES**	*All offices*	Managers and supervisors verify all final response preparations have been completed
H-24	**ALL OFFICES**	*All offices*	All staff is on stand-by statewide.
H-0	**Incident Command**		Will monitor updates from EOC on storm impact.
H-0	**DOA-OTS**		Monitors critical systems and stands ready to perform IT, GIS, and IS services as needed on 24/7 basis.
H-0	**ALL OFFICES**	*Non-impacted with no office closure*	Report for normal work assignment.
H+24	**All OFFICES**	*HQ and Regional Offices (as needed based on potential damage predicted)*	Essential staff is expected to report for incident response duty as directed by their supervisors.
H+24	**OES**	*Air Permits*	Deadline for Completed RVP waiver to be submitted

H-HOUR	GROUP	SUBGROUP	RESPONSE ACTIONS
		Division	to EPA for approval.
H+24	**OEC**	*Regional Manager*	The regional manager determines when and where field staff will report, considering issues related to the personal safety of the employee and his/her family.
H+24	**OEC**	*Regional staff*	Regional staff in an impacted area must notify the assigned person of their location and a means to contact them within 48 hours after landfall.
H+24	**OEC**	*Regional staff*	Non-impacted regions are on stand-by for instruction from IC to provide staff to the impacted regions for assignment.
H+24	**OEC**	*Air Analysis*	Assigned Regional or HQ staff will check air monitoring sites after landfall and report damages to IC.
H+24	**Incident Command**	*Operations*	RNA teams begin response and recon as soon as conditions allow.
H+24	**Incident Command**	*RNA Group Supervisor*	Data from RNA's is handed off to the IC. The IC will request field assessment teams to begin in depth assessments and sampling.
H+24	**Incident Command**	*Operations*	Other assessments begin based on RNA assessment data.
H+24	**Incident Command**	*Regional offices*	Regional offices impacted by storm will assess office damages and report IC.
H+24	**Incident Command**	*Regional Branch Director*	Regional manager or designee updates IC and Administrator relative to regional office status.
H+24	**Incident Command**	*Finance Officer*	At direction of Executive Staff, FSD staff obtains estimated cost from DEQ-IC and enters data into GOHSEP's Web EOC database on a daily basis.
H+24	**DOA-OTS**	*GIS*	DOA-OTS is activated, to provide accurate mapping and computer support to Planning.
H+48	**OMF**	*Financial Services*	FSD staff initiates collection of response actions for emergency and/or debris management from IC to initiate the Project Worksheet (upon Emergency Declaration by Governor).
H+72 and greater	**Parish Liaison Team(s)**	*SBSCAP and Regional Office personnel*	Within 72 hours after landfall, PLT staff will contact the impacted Parishes to address specific issues and maintain communications with the regional branch directors and/or the IC, per guidance and direction from the IC.
H+72 and greater	**All offices**	*All staff*	Continue response and support functions.

V. List of Attachments:

1. Parish Liaison Team with Assigned Parishes
2. Emergency Declaration & Administrative Order (Example)
3. Guidelines for Disaster Related Records
4. DEQ Debris Management
5. Phone Bank Assessment Guidance Document
6. OEC Natural Disaster and Catastrophic Event Preparedness Plan
7. State Emergency Operations Center ESF-10 Staffing Instructions
8. Single Point of Contact Hurricane Plan
9. Rapid Needs Assessment Plan
10. Radiation Hurricane Response SOP
11. Ambient Air Monitoring Site Plan
12. Underground Storage Tank and Remediation Division Hurricane Response Plan
13. Incident Command Organizational Structure
14. Environmental Assessment Plan
15. Debris Oversight Guidance

ATTACHMENT 1

Parish Liaison Team with Assigned Parishes

ATTACHMENT 2

Emergency Declaration & Administrative Order

ATTACHMENT 3

Guidelines for Disaster Related Records

ATTACHMENT 4

DEQ Debris Management Plan

ATTACHMENT 5

Phone Bank Assessment Guidance Document

ATTACHMENT 6

OEC
Natural Disaster and Catastrophic Event Preparedness Plan

ATTACHMENT 7

State Emergency Operations Center ESF-10 Staffing Instructions

ATTACHMENT 8

Single Point of Contact (SPOC) Hurricane Plan

ATTACHMENT 9

Rapid Needs Assessment Plan

ATTACHMENT 10

Radiation Hurricane Response Plan

ATTACHMENT 11

Ambient Air Monitoring Sites Hurricane Plan

ATTACHMENT 12

Underground Storage Tank & Remediation Division
Hurricane Response Plan

ATTACHMENT 13

Incident Command Organizational Structure

ATTACHMENT 14

Environmental Assessment Plan

ATTACHMENT 15

Debris Oversight Guidance

State of Louisiana
Department of Environmental Quality

Comprehensive Plan
for Disaster Clean-up and Debris Management

(a.k.a., LDEQ's "Debris Management Plan")

Revised May 24, 2017

Purpose

The purpose of the Comprehensive Plan for Disaster Clean-up and Debris Management (hereinafter referred to as the "Debris Management Plan") is to establish a framework to facilitate the proper management of debris generated by natural disasters within the state (R.S 30:2413.1). The goal is to facilitate a reasonable, efficient, and prompt recovery from such disasters and be protective of human health and the environment. The Debris Management Plan includes flexible and innovative approaches to address disaster-generated debris issues. It adheres to mission of the Louisiana Department of Environmental Quality (LDEQ) to protect human health and the environment to the fullest extent possible under the circumstances. The Debris Management Plan allows LDEQ the flexibility to consider, approve, or disapprove reasonable requests for authorizations, variances, and waivers as needed for rapid and environmentally sound waste management, recycling, and disposal. A primary objective of the Debris Management Plan is to conserve landfill capacity and to protect natural resources to the maximum extent practicable.

Pursuant to the laws of the state of Louisiana, the Secretary of the LDEQ is granted the authority to declare an emergency upon receipt of evidence of an incident that requires immediate action to prevent irreparable damage to the environment and serious threats to life or safety. Upon declaring that an emergency exists, the Secretary may issue such permits, variances, or other orders as necessary to respond to the emergency, and such orders are effective immediately. With the declaration of an emergency, the Secretary issues an administrative order, which provides specific measures authorized within the timeframe of the emergency. Those specific measures contained in the emergency order serve as relief for the duration of the order from the regulatory and proprietary requirements of the LDEQ. However, the measures do not provide relief from the requirements of other federal, state, and local agencies.

Thus, the regulatory flexibility to manage disaster-generated debris in the manner set forth in this Debris Management Plan is authorized upon issuance of an Emergency Declaration and Administrative Order by the LDEQ Secretary. The Emergency Declaration and Administrative Order will require adherence to the "Comprehensive Plan for Disaster Clean-up and Debris Management," except where the Debris Management Plan may be in conflict with the provisions of the Order. In the event of conflict, the Order shall prevail. Moreover, while this Debris Management Plan is consistent with state and federal law, it does not supersede any ordinance adopted by a local governing authority.

This Comprehensive Plan for Disaster Clean-up and Debris Management documents some of the lessons learned from prior disasters and extends beyond those lessons to formulate a plan that manages future disasters in a cohesive, organized, and efficient manner, while ensuring protection of public health and the environment.

The LDEQ prepared a Hurricane Katrina Debris Management Plan that was released on September 28, 2005, and revised on October 14, 2005. Additionally during the 2006 Regular Session of the Louisiana Legislature, Senate Bill 583 (Act 662) was enacted as LA R.S. 30:2413.1. LA R.S. 30:2413.1 directs the LDEQ to develop and implement a comprehensive debris management plan for debris generated by natural disasters. The bill states the goal of the comprehensive debris management plan is to "reuse and recycle material, including the removal of aluminum from debris, in an environmentally beneficial manner and to divert debris from disposal in landfills to the maximum extent practical and efficient

which is protective of human health and the environment." Among other things, SB 583 dictates the use of the following debris management practices, in order of priority, to the extent they are "appropriate, practical, efficient, timely, and have available funding: recycling and composting; weight reduction; volume reduction; incineration or co-generation; and land disposal." The Debris Management Plan is limited by and may not extend beyond the limitations impose by the Secretary's Emergency Declaration and Administrative Order.

This Debris Management Plan builds upon LDEQ's existing planning and is intended to be a living document. As such, it will be amended, as necessary, to address specific challenges as they arise.

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1.0 Background

Local governments are the lead responders for incidents and most incidents are handled locally (ex. fires, etc.). Some incidents (such as chemical transportations spills) escalate in complexity and are handled by a combination of state and local resources.

1.1 Response to Disasters

The Federal Emergency Management Agency (FEMA) assistance is triggered by the Governor's Declaration of an Emergency and a request for federal assistance. The Governor's request is made to the FEMA Regional office in Denton, Texas. Representatives from the Governor's Office of Homeland and Emergency Preparedness (GOHSEP) and FEMA conduct a preliminary damage assessment (PDA) to estimate the extent of the disaster and its impact on individuals and public facilities. This information is included in the Governor's request to show that the disaster is of such severity and magnitude that effective response is beyond the capabilities of the State and the local governments and that Federal assistance is necessary. Local response to save lives and initiate recovery takes place immediately and automatically while the external responses are mobilizing.

1.2 Disaster Categories

There are many types of disasters to contend with, which can be categorized as natural or man-made.

- **Natural** – floods, tornadoes, hurricanes, thunderstorms and lightning, winter storms and extreme cold, extreme heat, earthquakes, volcanoes, landslide and debris flows (mudslide), tsunamis, wildfires, epidemics/pandemics
- **Man-made** – hazardous materials spill/leak, terrorism, explosions, aircraft crashes, chemical emergencies, nuclear power plant incidents, fires, food poisoning outbreaks, bio-engineered agent releases

2.0 Disaster Management

The Debris Management Plan is designed to provide guidance to local governments and state agencies in planning, mobilizing, operating, and deactivating disaster debris sites. It is important that agencies and local governments handling debris have their own debris management plan that complies with this document and the debris management requirements of FEMA as published in FEMA's Debris Management Guide, FEMA-325. It is important that local debris management plans identify key staff members and their responsibilities for managing and controlling debris clearing, removal, and ultimate disposition operations. See http://gohsep.la.gov/GRANTS/RECOVERY-GRANTS/Public-Assistance/Debris-Management for more information from GOHSEP regarding debris management planning.

Disaster debris management is typically the largest part of government expenditures for disaster relief and recovery. The success of a debris management program is dependent upon the commitment by the agencies involved to planning, implementing, and evaluating their plan effectively and efficiently. Proper planning by management and effective employee training provides a foundation for a quick and successful recovery.

The benefits of advance planning for disaster debris management include:

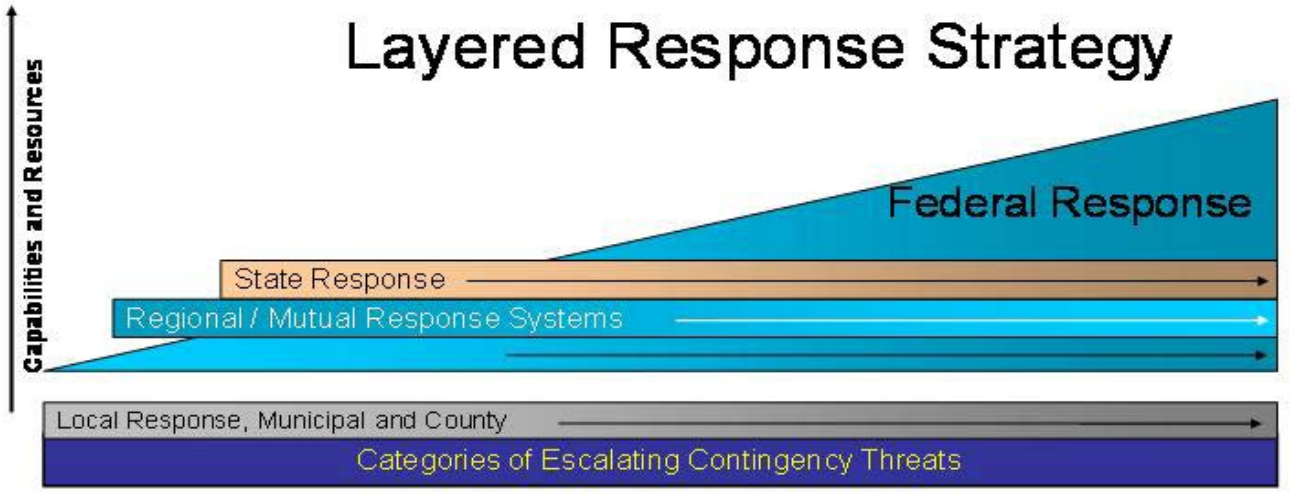
- organized control of disaster debris management,
- reduced costs,
- increased speed and efficiency of clean-up,
- minimized environmental and public health impacts,
- consistency with federal reimbursement requirements, and
- increased public awareness of debris management issues.

2.1 Debris Response Triggers

GOHSEP and FEMA use the results of the PDA to determine if the disaster situation is beyond the combined capabilities of the state and local resources and to verify the need for supplemental federal assistance (Figure 1). Since all disasters do not necessarily require debris management, it is possible to apply disaster types with disaster intensity to trigger various levels of debris options. Some examples are:

- LOW INTENSITY
  Trigger 1 - Impact 1 and local flooding or intense storms: Local debris site activation and vegetation debris reduction.
- MEDIUM INTENSITY
  Trigger 2 - Impact 2 and Cat. 1 Hurricanes or tornadoes: Consider construction and demolition (C&D) debris site collection
  Trigger 3 - Impact 3 and Cat. 2-3 hurricanes: Consider air curtain destructors, modification of C&D definitions for flooded areas and modification of asbestos handling guidance.
- HIGH INTENSITY
  Trigger 4 - Impact 4: consider additional debris sites and grinding C&D.
  Trigger 5 - Impact 5: consider amended residence demolition guidance; consider additional C&D guidance.
- CATASTROPHIC
  Trigger 6 - Impact 6: consider vegetative debris options, consider additional disposal options.

(NOTE: these are examples of how triggering might be applied and may *not* be used nor implied as being proposed for adoption by LDEQ.)



MINIMAL	LOW	MEDIUM	HIGH	CATASTROPHIC
Tornado	Ice Storm	Flood	CAT 3 - 4 Hurricane	LA Earthquake / New Orleans CAT 5 Hurricane
Influenza, food borne illnesses, endemic plague	Anthrax, plague with 1-2 cases	Pandemic Influenza	Smallpox	Bio-Engineered Agent
Traffic Accident	HAZMAT Spill	Aircraft Crash	Dam Break	Nuclear Plant Significant Incident

Figure 1. Categories of disasters. (from : http://www.pitt.edu/~super7/31011-32001/31531-31551.pdf)

2.2 Federal Funding Compliance Requirements

Recipients of FEMA funding will require state agencies and local governments to accept roles and responsibilities for environmental and historic preservation (EHP) compliance. EHP compliance is essential for proper and timely reimbursement and enduring the inevitable audit. These laws and executive orders are aimed at protecting water, air, coastal, wildlife, land, agricultural, historical, and cultural resources, as well as minimizing potential adverse effects to children, low-income, and minority populations.

FEMA funded activities that may trigger an EHP review are:

- debris removal;
- emergency protective measures;
- repair to pre-disaster condition;
- modification, expansion, and mitigation; or
- new construction and ground disturbance.

Detailed EHP information for state agencies and local government officials is provided at: http://www.crt.state.la.us/cultural-development/historic-preservation/section-106-review/index or https://www.fema.gov/environmental-planning-and-historic-preservation-program

3.0 Recycling and Beneficial Use

This Debris Management Plan is designed to encompass LDEQ's goal of reduction, conservation, and management relative to debris management. The Debris Management Plan promotes reduction of the debris stream utilizing chipping, grinding, recycling, or other methodologies as directed in LA R.S. 30:2413.1. It promotes conservation and management by ensuring that adequate capacity exists for disposal and management of disaster-generated debris, including that generated by redevelopment and repopulation by businesses and residents. The Debris Management Plan also encompasses the legislative mandate as directed in LA R.S. 30:2413.1 to reduce vegetative debris 50% by volume and 50% by weight prior to disposal in a landfill.

Local governments or state agencies should identify sites where recycling and beneficial use options may be utilized and should maintain standby contracts to provide for the oversight, implementation, and operation of recycling and beneficial use projects associated with disaster-generated debris activities. The standby contracts should include provisions to ensure that marketing outlets are available to receive and process the material resulting from the recycling and beneficial use activities. The recycling and beneficial use options provided below and later in this document will contribute to the Debris Management Plan's goals.

Solid waste exempt bricks and concrete free of asbestos containing material (ACM) (see LAC 33:VII.303.A.5) segregated from other C&D debris removed from homes during the demolition process may be recycled utilizing stone crushing equipment (large scale-crushing operations may require additional conditions or permits). Equipment utilized for this purpose shall be operated in accordance with manufacturers' instructions and any applicable LDEQ correspondence, authorization or guidance. A copy of the manufacturers' instructions shall be maintained on site and made available to the regulatory agencies upon request.

4.0 Debris Management Definitions

- **Animal carcasses** – remains of animals killed by a disaster.
- **Curbside segregation of debris –** sorting of debris by the resident into piles of discrete waste streams being collected as the result of a disaster. This is the most efficient and cost effective method of debris management. The segregated debris piles should be placed on the right-of-way and away from obstructions, such as, mailboxes, fire hydrants, gas meters, and telephone poles. Waste streams typically needing curbside separation in a disaster recovery effort are vegetative debris, construction and demolition debris, electronics, household hazardous materials, other special wastes and regular garbage. This will vary according to the extent of the disaster and the capabilities and decisions of local governments. Local government and state agencies should develop specifically tailored collection strategies for unique situations, such as, narrow streets, dense population, and narrow right-of ways. Curbside segregation of debris should not be done by the collection crews. In no case are munitions and ordnance to be the subject of curbside segregation. See Section 14.6 for more information on munitions and ordnance.
- ***De minimus* contamination** – insignificant contamination of approximately 5% but not exceeding 10%.
- **Electronic debris** – devices or components thereof that contain one or more circuit boards and are used primarily for data transfer or storage, communication, or entertainment purposes, including but not limited to, desktop and laptop computers, computer peripherals, monitors,

copying machines, scanners, printers, radios, televisions, camcorders, video cassette recorders (VCRs), compact disc players, digital video disc players, MP3 players, telephones, including cellular and portable telephones, and stereos.

- **Emergency construction and demolition (C&D) debris –** nonhazardous waste generally considered not water-soluble, including but not limited to, metal, concrete, brick, asphalt, roofing materials (shingles, sheet rock, plaster), or lumber from a construction, remodeling, repair, renovation, or demolition project that is authorized by the government to be necessary for a disaster. C & D debris does not include regulated asbestos-containing material RACM as defined in LAC 33:III.5151.B, white goods, creosote-treated lumber, and any other item(s) not an integral part of the structure.
- **Emergency debris site –** a location that has been identified by the local government or state agency and has been evaluated and approved by LDEQ for the purposes of staging, reduction, or final disposal of disaster-generated debris. Emergency debris sites **do not** include the staging or other processing of municipal solid waste or putrescible waste and may not be used unless approved by LDEQ.
- **FEMA Eligible debris –** debris must: be a direct result of a presidentially declared disaster; occur within the designated disaster area; and be the responsibility of the applicant at the time of the disaster. Debris removal work must be necessary to: eliminate an immediate threat to lives, public health and safety; eliminate immediate threats of significant damage to improved public or private property; or ensure the economic recovery of the affected community to the benefit of the community-at-large. FEMA, not LDEQ, determines eligibility. For specifics, see: http://www.fema.gov/
- **FEMA ineligible debris –** debris from a previous disaster; debris from unimproved property or undeveloped land; debris from a facility that is not eligible for funding under the Public Assistance Program, such as public golf courses or cemeteries; and debris from Federal lands or facility that are the authority of another Federal agency or department. For specifics, see: http://www.fema.gov/
- **Household hazardous waste (HHW) (a.k.a., "household waste" under the hazardous waste regulations) –** waste that can catch fire, react, explode, is corrosive or toxic that is generated by individuals on the premises of a residence for individuals (a household) and composed primarily of materials found in the wastes generated from homes. Wastes generated by commercial or industrial establishments that appear to be the same as household waste are not considered household hazardous waste and must follow state and federal hazardous waste regulations.
- **Metals** – (or scrap metals) bits and pieces of metal parts (e.g., bars, turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering (e.g., radiators, scrap automobiles, railroad box cars), which when worn or superfluous can be recycled. Materials not covered by the definition of scrap metal include "residues generated from smelting and refining operations (e.g., drosses, slags, and sludges), liquid wastes containing metals (e.g., spent acids, caustics, or other liquid wastes with metals in solution), liquid metals wastes (e.g., liquid mercury), or metal-containing wastes with a significant liquid component, such as spent batteries.
- **Municipal waste–** Residential and/or commercial solid waste.
- **Orphan drums (and tanks) –** abandoned or lost containers that may contain hazardous substances, such as propane, industrial chemicals, and unknown substances.
- **Putrescible waste-** waste susceptible to rapid decomposition by bacteria, fungi, or oxidation, creating noxious odors.

- **Tires –** whole tires (i.e., the continuous solid or pneumatic rubber covering encircling the wheel of a motor vehicle or off-road vehicle) that are no longer suitable for their original purpose because of wear, damage, or defect. These do not include any tire weighing over 500 pounds and/or a solid tire.
- **Vegetative Debris** – vegetative matter resulting from landscaping, landscape maintenance, right-of-way or land-clearing operations, including trees and shrubbery, leaves and limbs, stumps, grass clippings, and flowers.
- **Vehicles –** an automobile; motorcycle; truck; trailer; semitrailer; truck, tractor and semitrailer combination; or any other vehicle used to transport persons or property and propelled by power.
- **Vessels** – any type of watercraft used, or capable of being used, as a means of transportation on the water.
- **White goods** – discarded domestic appliances including, but not limited to, refrigerators, ranges, washers, freezers, dryers, air conditioning and heating units, freestanding ice makers, built-in stove surface units and oven units, and water heaters. White goods do <u>not</u> include small household appliances, such as, stand mixers, toasters, blenders, etc.
- **Woodwaste** – types of waste generated by sawmills, plywood mills and woodyards associated with the lumber and paper industry, such as wood residue, cutoffs, wood chips, sawdust, wood shaving, bark, wood refuse, wood-fired boiler ash, wood ash, and plywood or other bonded materials that contain only polyurethane, phenolic-based glues, or other glues that are approved specifically by the administrative authority. Uncontaminated, un-treated, or un-painted lumber, board road lumber, or wooden pallets are considered woodwaste under this definition.

5.0 Emergency Debris Sites

LDEQ recognizes that decisions on the disposition of wastes and debris need to be made at the collection point. Use of best professional judgment will be necessary to determine the ultimate disposition of collected material. State agencies and local governments will need to determine appropriate sites for the following temporary activities that may be required to respond to a disaster:

- staging, chipping & grinding, composting, and/or burning of vegetative debris;
- staging of C&D debris;
- staging of woodwaste;
- staging and/or preparation of white goods;
- staging of electronic debris;
- staging of metals;
- staging of tires; and
- other activities as requested on a case-by-case basis (including staging of vehicles & vessels, household hazardous waste, orphan drums, animal carcasses, etc.).

Agencies and local governments should also consider the number, type of sites, and transportation access that may be required. If more than one entity plans to use the site, the wastes cannot be comingled and has to be delineated and separate from each other. It is recommended that each responsible party have a plan outlining how the debris should be handled and if it should be segregated curbside or at the emergency debris site.

LDEQ will pre-approve disaster debris sites for staging of vegetative debris, emergency C&D debris, woodwaste, white goods, tires, metals, and electronic debris and chipping & grinding, composting, and burning of vegetative debris. Other debris types and activities will NOT be approved until after an emergency has been declared. Sites that were approved by LDEQ for use in previous recent disasters are prime candidates for pre-approval. The designation of a location as an inactive "pre-approved" site will be subject to an annual certification by June 1 (i.e., after the first year of the preapproval's issuance).

Upon the declaration of a disaster by the Secretary of LDEQ, local governments and state agencies may "activate" a pre-approved site for its intended purpose. Upon activation, a verbal notification shall be provided to the LDEQ Headquarters that the site is active. This verbal notification shall occur as soon as practicable depending on communication capability. A written follow up notification shall be made within five days of the activation date to LDEQ Headquarters. LDEQ Personnel will monitor the site and handle site "deactivation" requests once the site use is no longer needed for the disaster for which the site was activated. A site may be permanently closed as a pre-approved site upon request of the property owner, the local government that requested designation, or LDEQ.

Contractors chosen by the local governing authority, or by state or federal agencies, should possess knowledge of applicable regulations, this Debris Management Plan, and any LDEQ Declarations of Emergency and Administrative Order in order to correctly manage, transport, and route waste streams to appropriate sites and/or facilities.

5.1 Finding the Right Location

When selecting a proposed emergency debris site, the local government should consider the following:

- Ownership of site? If not government owned, the applicant needs to have secured access rights to the property. (Note: It is up to the local government to ensure that they have the legal right to utilize the site for its intended purpose.)
- Does the site have an approval from the State Historic Preservation Office?
- What is the proposed use for this site?
- Is the proposed site located outside of the 100-year floodplain and wetlands?
- Are there nearby residences and/or businesses that will be inconvenienced or adversely affected by use of the site?
- Are there any site safety issues? (e.g., power lines, pipelines)
- Are any erosion and/or rainwater runoff control measures needed?
- Is additional containment necessary for any wastes that have a potential for leaking? (e.g., white goods leaking Freon)
- Are the roadways and entrance to the site suitable for trucks hauling debris?
- Is the site fully accessible to fire personnel and equipment?
- Is the size of the site sufficient for its intended use?
- Is the general terrain of the site suitable for the proposed activities?
- For chipping & grinding, is the proposed site more than 300 feet to residences, businesses, schools, hospitals, clinics, and roads?
- For burning, is the proposed site more than 1,000 feet to residences, businesses, schools, hospitals, clinics, and roads?
- Is the proposed site more than 100 feet to property boundaries and on-site structures?

- Is the proposed site more than 250 feet to potable water wells?
- Is the proposed site more than 100 feet to nearby surface waters?
- Is the proposed site more than 10,000 feet to the nearest airport?

5.2 Site Pre-Approval

In order for a location to be considered by the LDEQ as an emergency debris site, the agency or local government must submit an Emergency Debris Site Request Form to LDEQ. A copy of the form is attached as Attachment A and is available on LDEQ's website at http://deq.louisiana.gov/resources/category/debris-management. Sites requested will be inspected by LDEQ and a recommendation made to the Waste Permits Division (WPD). If the site is approved, LDEQ will inform the local government by letter with accompanying authorization. The letter and accompanying Authorization for Pre-approved Emergency Debris Site will contain any restrictions or operational conditions that are specific to the site. Operational conditions will be outlined in the authorization.

5.3 Temporary Site Approval

In the event of a disaster where a pre-approval site does not exist, the same procedure should be followed to request the site. Once the site request is received, the site will be inspected by LDEQ and a recommendation made to WPD. LDEQ may provide verbal approval that the site may be used for staging of vegetative debris, woodwaste, emergency C&D debris, electronic debris, tires, metals, or white goods. If the site is approved, LDEQ will inform the local government by letter with accompanying authorization, following any verbal approval by LDEQ. The letter and accompanying authorization will contain any restrictions or operational conditions that are specific to the site. Operational conditions will be outlined in the authorization. Burning and/or disposal of debris will not be verbally approved.

5.4 Recordkeeping

The state and local governments or their designee (contractor(s)) should keep a record of the amount of all types of materials/wastes recovered and transported for recycling and or disposal. Some products already require recordkeeping, e.g. used oil, and duplicate recordkeeping is not required.

In order for LDEQ to monitor the local government or state agency management of the vegetative debris waste stream and to ensure that the Legislative Mandate has been met, all vegetative debris sites processing vegetative debris (staging, chipping & grinding, composting, and burning sites) shall submit to LDEQ on a weekly basis, a Weekly Debris Management Report (WDMR, form can be downloaded from: http://deq.louisiana.gov/assets/docs/Land/WDMR.docx) indicating how much vegetative debris is received, what method(s) of process is utilized (e.g. chipping, grinding, and/or burning), how much vegetative debris is processed, and the final fate of the waste stream (e.g. industrial boiler fuel, compost/mulch, a component of the cover system for a landfill, disposal in landfill, etc.). This report is required to be filled out for all active sites until all of the vegetative debris received has been completely processed. All WDMRs (see Attachment B) shall be submitted before the debris site can be closed or deactivated.

All WDMRs shall be certified by a person duly authorized by the local government or state agency responsible for the debris site. The certification states, "I certify under penalty of law that this document

and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on an inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

If approved, site operations will comply with the temporary staging area Authorization for Pre-approved Emergency Debris Site provided with the site approval. **It is the responsibility of the local government and/or a state agency to provide the Debris Management Plan, approval correspondence, Authorization for Pre-approved Emergency Debris Site (<u>including all appendices</u>) and guidance to any entity charged with the operation of an emergency debris site.** See Attachment D for an example of the Authorization for Pre-approved Emergency Debris Site.

It is the local government or state agency's responsibility that all WDMRs are filled out and submitted to LDEQ in a timely manner.

NOTE: WDMRs are *only* required for *vegetative* debris.

5.5 Pre-approval Site Deactivation

Each pre-approved emergency debris site, with the exception of authorized vegetative debris sites where ash is land-applied, will eventually clear disaster-related debris and be restored to its previous condition and use. Deactivation must be in accordance with approved LDEQ practices and/or the Authorization for Pre-approved Emergency Debris Site. Once a deactivation inspection is requested by the state and/or local government, the site can no longer be used for the active emergency. Sampling of soil and/or ash that is left at the site may be required by the LDEQ. The agency or local governing authority will be required to take necessary steps to ensure that no environmental contamination is left on-site.

Deactivation should be accomplished within the time limits established by the LDEQ. Once a deactivation assessment is conducted and all WDMRs have been received and verified complete, a deactivation letter is issued by LDEQ indicating that the debris site is considered deactivated by LDEQ and shall not accept or process any additional debris. The site can be re-activated if a new emergency occurs.

5.6 Debris Site Closure

Closure is applicable to all temporary emergency debris sites and those pre-approved sites being withdrawn as pre-approved sites. Once activities are completed at an emergency debris site, the debris will be cleared and the land restored to its previous condition, with the exception of authorized vegetative debris sites where ash is land-applied. Sampling of soil and/or ash that is left at the site may be required by the LDEQ. The agency or local governing authority will be required to take necessary steps to ensure that no environmental contamination is left on-site. LDEQ will inspect the site to ensure it has been closed in accordance with LDEQ regulations. Once a closure assessment is conducted and all WDMRs have been received and verified complete, a closure letter will be issued to the agency or local governing authority responsible for the site stating that the site is closed and shall not accept or process any additional debris. Once a site has been closed or withdrawn as a pre-approved site, the local government or state agency will have to re-apply to use the site.

6.0 Vegetative Debris Management

Every effort shall be made to consolidate material from fallen trees and other vegetative debris in an attempt to beneficially use as much of this material as possible. For example, some local industries can utilize the wood material for fuel, and should be encouraged to do so. Material may be chipped or otherwise reduced in volume to allow for composting or other beneficial reuse. Site operations must conform to the requirements of R.S. 30:2413.1 in that "the total green and woody debris intended for final disposal in a landfill, fifty percent (50%) shall be reduced by weight and fifty percent (50%) by volume prior to transport to a landfill" (for disposal). The law states, “The management plan shall be to reuse and recycle material and to divert debris from disposal in landfills to the maximum extent practical, efficient, and expeditious in a manner that is protective of human health and the environment.”

Vegetative debris may be transported to a landfill for reduction; however, it may not be placed directly into a cell for final disposal until reduced. Although LDEQ encourages as close to a 100% diversion of vegetative debris from final disposal into landfill cells, the statutory minimum requirement is the 50% reduction by weight and volume. Vegetative debris may be reduced by any lawful method, transported to a landfill, and placed in cells after reduction.

In order to effectively implement this policy; encourage recycling and the beneficial use of vegetative debris; and the efficient management of debris generated during emergencies, LDEQ has required that all emergency debris sites submit a WDMR. These weekly reports indicated the volume and weight of debris received, processed, recycled, and disposed in a landfill. LDEQ determined that the most equitable method for attaining the goal for all state agencies was to apply the statute statewide. Instances where the goal was not met by local state subdivision, either municipal or parish, will be examined by LDEQ staff to determine why the goal was not met and what needs to be done to improve compliance on a case-by-case basis.

See Section 16.0 regarding the quarantines for certain insects.

6.1 Coastal Restoration Projects

The Louisiana Department of Natural Resources (LDNR) has stated, "The potential to use post-storm “woody” vegetative debris in coastal Louisiana for coastal restoration and protection purposes is very limited. Several demonstration projects have been attempted; however, they proved not to be economically and ecologically justifiable.” See:
http://deq.louisiana.gov/assets/docs/Land/VegetativeDebris-coastal-restoration.pdf

6.2 Vegetative Debris as Industrial Fuel

There may be regulatory limitations for a facility who may utilize wood material as an industrial fuel source. Waste generators should check with the LDEQ prior to donating or selling the material to local industries for fuel to ensure that the final destination has proper authorization to burn debris.

6.3 Vegetative Debris Staging and Processing Sites

Materials approved for receipt at vegetative debris staging and processing sites include vegetative debris such as yard waste, trees, limbs, stumps, and branches. Sites should be identified as staging, chipping & grinding, composting, and/or burning sites. All debris sites must be operated in accordance with the

LDEQ-provided Authorization for Pre-approved Emergency Debris Site or other LDEQ correspondence or guidance. All equipment (grinders, chippers, air curtain burners) shall be operated in accordance with manufacturers' instructions and any applicable LDEQ authorization. A copy of the manufacturers' instructions shall be maintained on site and made available to the regulatory agencies upon request.

6.4 Vegetative Debris Staging

Some debris sites will only stage vegetative debris and shall not conduct any form of processing (e.g., chipping, grinding, composting, or burning) of the vegetative debris. These debris sites shall only temporarily store the vegetative debris until it is to be hauled to a processing site for reduction. **Note: FEMA generally only pays to transport debris once, so it is recommended that staging sites also be approved for a reduction method, as vegetative debris must be reduced 50% before disposal in a landfill.**

Maintaining staging piles of vegetative debris with a height of less than 20 feet and base width of less than 30 feet provides greater surface area for dissipation of heat and volatile gases, thereby minimizing the risks of spontaneous combustion. Frequent monitoring is required. Staging sites must limit the temperature of staged piles of vegetative debris to 160°F or less in order to reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape. Site must take all necessary measures to prevent combustion of materials. Sites only approved for staging must request and obtain written approval in order to chip, grind, compost, or burn debris.

It is strongly recommended that local governments designate an approved emergency debris site as a drop-off vegetative debris site where residents may bring vegetative debris for aggregation and/or processing. It is also suggested that a portion of this site be setup to accept other residential materials, such as, electronics, appliances, household hazardous materials, tires, and compressed gas cylinders. If debris other than vegetative debris is to be staged at this site, it must also be approved to stage these materials. A separate container for residential garbage would be especially useful. Drop-off sites should be designed and managed with public safety as a priority.

6.5 Vegetative Debris Chipping & Grinding/Composting

In preparing compost and/or mulch piles, care should be taken to reduce the potential for spontaneous combustion. Placing chipped or ground organic debris into piles can result in rapid microbial decomposition that generates heat and volatile gases. Temperatures in large piles containing readily degradable debris can rise to greater than 160°F, increasing the chance of spontaneous combustion.

Spontaneous combustion is more likely in large, dense piles of debris under dry, windy conditions. Maintaining windrows with a height of less than 6 feet and a base width of less than 10 feet provides greater surface area for dissipation of heat and volatile gases, thereby minimizing the risks of spontaneous combustion. Site must take all necessary measures to prevent combustion of materials.

Turning piles when temperatures reach 160°F can also reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape. Turning piles when temperatures decline can restore microbial activity and composting temperatures. Optimal moisture should be maintained to reduce combustibility. As a rule, optimal moisture is obtained when squeezing a handful of material yields a drop or two of water.

Shredded leafy debris will decompose more rapidly and retain more heat than wood chips. Sufficient wood chips or other bulky materials should be mixed with leafy material to ensure rapid diffusion of heat and gases during the early stages of decomposition. The ideal ratio of carbon (wood chips) to nitrogen (green materials) in a compost pile is about 30:1. A pile with that balance of materials will decompose steadily, and yield nutrient-rich compost.

Large piles or windrows should be located away from wooded areas, power lines, bridges, and other structures. The site should be accessible to firefighting equipment, if a fire were to occur.

6.6 Vegetative Debris Burn Sites

LDEQ recommends the local fire department be notified prior to a burning event. Vegetative debris burn sites consist of open burning and burning via the use of a portable air curtain destructor (ACD, also known as air curtain incinerator or pit burner). Proximity to roads and dwellings is of particular importance in the selection of sites for this activity. In general, 1,000 feet is considered the minimum distance a burn site should be located away from any residences or businesses.

As with all proposed emergency debris sites, open burning locations must be approved by LDEQ in advance of their use. Local governments may utilize open burning during the initial disaster response for a reasonable timeframe to allow for the reestablishment of critical arteries for transportation, emergency response, and governmental operations. Timeframes will be reflected by the magnitude of the disaster.

Open burning may have site specific requirements that are included in the pre-approval documents. In addition, where continued burning is necessary, any burning shall utilize equipment to efficiently combust waste and reduce emissions if LDEQ or local governing authority deems the use of equipment necessary to protect public health and the environment. Local, state, and federal partners associated with the vegetative debris burning operation will be advised of locations that have been approved for this purpose. All sites must be operated in accordance with the LDEQ-provided Authorization for Pre-approved Emergency Debris Site or other LDEQ correspondence or guidance.

Portable ACDs should be operated in accordance with the manufacturers' instructions and with any applicable LDEQ permits or directives. *A copy of the manufacturers' instructions shall be maintained on site and made available to the regulatory agencies upon request.*

LDEQ has adopted regulations for portable ACDs. Large-scale air curtain operations may require additional conditions or permits. Operators should be familiar with the air regulations for ACDs. See LAC 33:III.313, which can be found at:
http://deq.louisiana.gov/assets/docs/Legal_Affairs/Air052017.pdf.

6.7 Vegetative Debris Disposal

To the extent possible and practicable, vegetative debris that cannot be beneficially used will be disposed in permitted landfills. The total volume of green and woody debris intended for final disposal in a landfill shall be reduced fifty percent (50%) by volume and fifty percent (50%) by weight prior to final disposal. This chipped or ground vegetative debris may be used as compost, a component of daily cover (with written permission from LDEQ), ground cover, erosion control material, or as fuel. Vegetative debris may not be disposed in a landfill as the first option, but may be used as a component of the cover system, road bed material, or a means for providing erosion control for a landfill.

Ash from vegetative debris burn sites may be land applied on site or off site. **Off site application of ash will require specific, written prior approval by LDEQ or LDAF.** Whenever possible, soil test data and analysis of the ash should be available to determine appropriate application rates. Ash should not be applied during periods of high winds. Ash should not be applied within 25 feet of surface waters or ditches or drains on vegetated sites. These distances should be doubled on sites that are not vegetated, and the ash should be promptly incorporated into the soil. As an approved *alternative* to land application, ash from combustion of clean vegetative debris may be utilized as a blending or stabilization component, chemical activator, replacement component in masonry products or a component of pozzolanic concrete. Ash that cannot be land applied or used in an alternative manner shall be disposed at a permitted solid waste landfill.

Assistance in obtaining soil test data and waste analysis of ash may be available through the LSU Cooperative Extension Service's Soil Testing Laboratory. http://www.stpal.lsu.edu/

7.0 Marsh Debris Management

Requests for staging and/or processing marsh grass at an emergency debris site should be made when a specific need arises using the Emergency Debris Site Request Form.

Other requests to manage marsh grass will be considered on a case-by-case basis. This may include, but not be limited to, approval of a Best Management Practice (BMP) by the Louisiana Department of Agriculture and Forestry or other environmentally sound management practices. The bases for such decisions shall include how to best manage the marsh grass in an environmentally sound manner given its nature and composition (e.g., earthen material, vegetative material, salinity, etc.).

Freshwater marsh grass debris can be an effective additive to composting vegetative debris. As marsh grass is almost completely water, it provides a natural moistening agent to composting, and at the same time, accelerating the natural process of decomposition. According to Bill Carney, Ph.D., Coordinator of the LSU Ag Center, Callegari Center Environmental Center, utilization of this freshwater marsh grass in the composting process in a 3:1 ratio of marsh grass (carbon source) to a nitrogen source (manure, green grass) will result in the most effective management of this debris which is extremely difficult to burn. Increased salt content due to storm surge may affect its final use as a soil amendment after composting. There exist field test meters that can be used to determine salinity levels.

If marsh grass is contaminated with non-vegetative debris, it cannot be burned and should be sent directly to a landfill for disposal. If the contaminating material is C&D, the grass shall be sent to a Type III landfill for disposal. Marsh grass contaminated with oil may be burned **IF** approved by LDEQ and local government agreement. Otherwise, oil-contaminated marsh grass shall be sent directly to a Type I industrial landfill for disposal.

7.1 Retrievable Debris from Wetlands

Retrievable debris items located in wetland areas shall be retrieved in accordance with the Army Corp of Engineers and transported to an authorized debris management area. Those items will then be either recycled and/or disposed in accordance with this Debris Management Plan. The Army Corp can be

contacted at the following numbers: New Orleans at (504) 862-2270, Vicksburg at (601) 631-5972, Galveston at (409) 766-3941, or Fort Worth at (817) 886-1731.

Retrievable debris items should, if possible, be retrieved during the initial recovery operation, managed, and transported to facilities that are approved for their receipt and management. These debris recovery and removal activities should not be expected to result in appreciable habitat disturbance.

7.2 Irretrievable Debris

Irretrievable debris items that are located in the marsh, especially sensitive marsh areas, shall be managed in accordance with the Army Corp of Engineers. These debris management activities are expected to result in appreciable habitat disturbance and, therefore, would require an expedited or emergency trustee consultation.

7.3 Marsh Burning

Care needs to be taken with marsh burning during disaster recovery operations. Due to the immense amounts of vegetative debris generated in most disasters, these fires can easily expand beyond anticipated burn areas. Marsh burning near active debris sites can pose risk to the site and site personnel. Burning is a practice utilized in marsh areas, especially in areas designated as a refuge. Refuge areas utilize marsh fires on a 2 to 3 year rotational schedule to manage the accumulation of marsh grass and other vegetative/woody debris. The refuges and other entities (i.e. private, parish, state, or federal) owning marsh areas that are non-oil contaminated areas may utilize this method to address the accumulations of marshy grass and debris generated because of a natural disaster. The utilization of a marsh fire to address the disaster-generated debris must be communicated to and coordinated with local, state and federal entities participating in the disaster response and management activities (i.e., parish government, property owners, parish and local fire departments, LDNR, the Louisiana Department of Wildlife and Fisheries (LDWF), LDEQ, EPA, US Coast Guard, and the US Army Corps of Engineers).

The plans and procedures pertaining to marsh burning are to be evaluated and authorized by all entities involved in the effort. The plan must take into consideration the potential presence of hazardous, flammable, ignitable, or reactive materials that could influence the marsh burning operation. This is needed so that the proper environmental and personal safety precautions will be set forth in the marsh burning plans and procedures.

7.4 Transportation in the Marsh

The specific methods of maneuvering transport vehicles (i.e. marsh buggies, pontoons, etc.) in the various areas of the marsh for the purposes of debris management and retrieval activities will need the concurrence of the LDNR, LDWF, other pertinent state level agencies, and property owner(s). This coordination is also needed to address potential navigation hazards or obstructions posed by the presence of disaster-generated debris in the marsh areas.

8.0 Emergency C&D Debris Management

In the event of a considerable amount of the disaster-generated C&D debris, staging may be necessary and debris shall be transported later to LDEQ permitted C&D debris landfills.

If approved, site operations will comply with the temporary staging area Authorization for Pre-approved Emergency Debris Site provided with the site approval. See Attachment D for an example.

The local government or state agency's emergency debris plan should have a detailed process for segregating, as much as is practicable, unsuitable materials such as household garbage, white goods, asbestos containing materials, and HHW. These materials should be placed in appropriate containers and transported to facilities that are approved for their receipt. If more than *de minimus* amounts of these wastes are present, the waste should be handled in a manner consistent with the most stringent management technique necessary for the waste stream. Louisiana has new Louisiana Emission Standard for Hazardous Air Pollutants (LESHAP) Guidance on Residential Demolitions. For proper handling of asbestos, see the LDEQ LESHAP Guidance for Renovations and Demolitions at Appendix C-2. Staff in the regional offices (see Appendix C-1) can be contacted with questions related to proper handling of asbestos containing materials and asbestos containing wastes.

Emergency-generated C&D debris shall be disposed in permitted C&D debris landfills. However, due to the devastation caused by a natural disaster, it may be necessary for LDEQ to approve disposal of emergency C&D debris at sites that are deemed appropriate but are not permitted. In extreme circumstances, local governments may request establishment of emergency C&D disposal sites. Sufficient information must be provided to justify the request and that demonstrates the site will operate under efficient, expeditious, and environmentally safe operations. At the time of the request, the local government must address how the closure of the site will be accomplished, who will manage the site closure, and the party responsible for funding the site closure. If approved, site operations must comply with the Authorization for Pre-approved Emergency Debris Site provided by LDEQ.

See Section 16.0 regarding the quarantines for certain insects.

9.0 Woodwaste

Staging of woodwaste may be necessary. If the site is only approved for staging of woodwaste, no processing, (e.g., burning) shall occur at the site. Separation of woodwaste is allowed. Woodwaste shall be transported later to LDEQ permitted C&D debris and woodwaste landfills. LDEQ may allow burning of woodwaste on a case-by-case basis once a request has been made.

If approved, site operations will comply with the temporary staging area Authorization for Pre-approved Emergency Debris Site provided with the site approval. See Attachment D for an example.

Arrangements should be made to segregate materials. These materials should be placed in appropriate containers and transported to facilities that are approved for their receipt. If more than *de minimus* amounts of these wastes are present, the waste should be handled in a manner consistent with the most stringent management technique necessary for the waste stream.

See Section 16.0 regarding the quarantines for certain insects.

10.0 Electronic Debris

In order to contribute to increased recycling and to reduce the volume of waste disposed in landfills, electronic debris should be recovered. It is recommended that local governments contract with an

electronics recycler or use the state recycling contractor to come and collect electronics for recycling and dismantling. A state contract is available for state agencies and local government agencies to utilize for the collection of electronics. A list of electronic recyclers can be found on the Electronic Industries Alliance website located at http://www.ecyclingcentral.com.

Cathode Ray Tubes (CRTs) shall be sent for reuse and/or recycled. See the LDEQ regulations at LAC 33:V.4911, 4913, and 4915. (Conditional Exclusion for Used, Broken Cathode Ray Tubes Undergoing Recycling, Conditional Exclusion for Used, Intact Cathode Ray Tubes (CRTs) Exported for Recycling, Notification and Recordkeeping for Used, Intact Cathode Ray Tubes (CRTs) Exported for Reuse).

11.0 White Goods

Local governments should set up citizen drop-off collection sites for large appliances (white goods) in the event that a large amount of such material is anticipated. It is recommended that local governments contract with a metals/or scrap appliance dealer to come and collect white goods for recycling, as white goods may not be landfilled. Mercury switches and refrigerant must be removed from appliances by the contractor. Mercury containing devices are easily handled. More detailed information on handling mercury devices in appliances is available from LDEQ's web site at:
http://deq.louisiana.gov/page/recycling#Mercury.

Appliances containing refrigerant, including refrigerators, freezers, and window air conditioner units, should have the refrigerant removed by refrigeration technicians certified by the Environmental Protection Agency (EPA) to prevent releases. EPA also maintains a current list of approved refrigerant reclaimers. The approval status of a refrigerant reclaimer can be confirmed by contacting EPA's Ozone Protection Hotline (800-296-1996) or by accessing EPA's Office of Air and Radiation Stratospheric Protection Division webpage: http://www.epa.gov/ozone/title6/608/reclamation/reclist.html. More information about safe federal disposal procedures for household appliances that use refrigerants can be found at: http://www2.epa.gov/rad/safe-disposal-procedures-household-appliances-use-refrigerants

12.0 Metals

In order to contribute to an increase in recycling and to reduce the volume of waste disposed in landfills, metals should be recycled or salvaged. It is recommended that local governments contract with a recycler or sell the metal for scrap.

13.0 Tires

Tires collected through hurricane debris collection activities and deposited at parish collection centers will be ineligible for payment of the Waste Tire Management Fund subsidy and are to be treated as debris under FEMA funded debris removal programs. Eligibility of tires for the subsidy shall be governed by the most current version of LDEQ's Declaration of Emergency and Administrative Order. For more help, contact LDEQ Waste permits Division at (225) 219-5337 or wastetires@la.gov.

14.0 Special Debris Management

14.1 Abandoned Vehicles and Vessels

Local governments will propose a staging point for the temporary storage of abandoned vessels and vehicles. These sites should be secure, fenced, and lighted. LDEQ shall evaluate and, if appropriate,

authorize the staging site. The Office of State Purchasing will negotiate contracts related to the recovery and recycling of abandoned vehicles. The Louisiana Department of Transportation and Development will be the project manager for the vehicle recovery and recycling project associated with the disaster response.

Vehicles and vessels brought to the staging areas shall be inventoried by license plate, make, model, color and vehicle identification number. They shall be staged and site tagged for easy retrieval. Scrap vehicles shall be dismantled and properly recycled. The following materials shall be recovered: gasoline and diesel fuel, refrigerants, lubricating oils, mercury ABS switches, mercury convenience switches, lead acid batteries, brake and transmission fluid, antifreeze, and tires. Propane tanks and large appliances in recreational vehicles shall be removed.

Louisiana has laws governing the disposal and titling of "water-damaged vehicles" other than an antique, whose power train, computer, or electrical system has been damaged by flooding as the result of a gubernatorial declared disaster or emergency. Government entities should refer to LA R.S. 32:706.1 *et seq.* and confer with the Louisiana Department of Motor Vehicles.

Vessels deemed for scrap shall be crushed to reduce volume for easier handling and management, shredded, and properly recycled when possible. The following disposition for hull materials shall be followed: metal boat hulls shall be handled as scrap metal; wooden boat hulls shall go to a Type I or Type II landfill; and fiberglass and composite hulls shall go to a Type II or Type III (C&D) landfill. The following materials shall be recovered: gasoline and diesel fuel, refrigerants, lubricating oils, mercury bilge switches, propane tanks, large appliances, lead acid batteries, transmission fluid, and electronics such as radar sets, radios, GPS units, and depth finders.

Government entities should confer with the LDWF concerning the disposal of abandoned state registered vessels. The US Coast Guard should be consulted concerning the disposal US Registered Vessels. The USCG Documentation Center has vessel title and lien information. Their database can be accessed at: http://www.st.nmfs.noaa.gov/st1/CoastGuard/VesselByName.html. The disposal of any vehicle or vessel contaminated with oil or gasoline shall be coordinated with the LDEQ.

14.2 Compressed Gas Cylinders

Compressed gases present a unique hazard. Depending on the particular gas, there is a potential for simultaneous exposure to both mechanical and chemical hazards. Gases may be flammable or combustible, explosive, corrosive, poisonous, inert, or a combination of hazards. If the gas is flammable, flash points lower than room temperature compounded by high rates of diffusion present a danger of fire or explosion. Additional hazards of reactivity and toxicity of the gas, as well as asphyxiation, can be caused by high concentrations of even "harmless" gases such as nitrogen. Since the gases are contained in heavy, highly pressurized metal containers, the large amount of potential energy resulting from compression of the gas makes the cylinder a potential rocket or fragmentation bomb.

Propane is a flammable gas that is generically referred to as LP-Gas or, LPG. It is recommended that local governments contract with a local LPG dealer to handle the inspection, pickup, recycling, and redistribution of functional LPG and other flammable gas containers.

There shall be no deliberate release of any compressed gas container, including oxygen and nitrogen tanks, by personnel as a part of the debris collection efforts. De-pressurized gas containers may still contain explosive gas mixtures. Scrap metal shall be segregated and is recommended for recycling.

14.3 Fluorescent lamps

Fluorescent lamps may be a Universal Waste and may be recycled using the state contract for fluorescent lamps. See: https://wwwcfprd.doa.louisiana.gov/osp/lapac/ecat/dsp_eCatSearchLagov.cfm: https://wwwcfprd.doa.louisiana.gov/osp/lapac/ecat/dsp_eCatSearchLagov.cfm

14.4 Household Hazardous Waste (HHW)

Contact the LDEQ Headquarters prior to staging any household hazardous waste.

Hazardous waste is waste that can catch fire, react, explode, is corrosive, and/or toxic. Most HHW produced by residential consumers is in small quantities, so those wastes have been exempted from regulation as a hazardous waste by EPA and the State of Louisiana if the HHW is sent to a Subtitle D landfill for disposal. To be defined as "household" waste and thus considered exempt from federal/state hazardous waste regulations, the waste must be generated by individuals on the premises of a residence for individuals (a household, bunkhouse, hotel) *and* composed primarily of materials found in the wastes generated from homes. Wastes generated by commercial or industrial establishments that appear to be the same as household waste are not exempt from state/federal hazardous waste regulations.

LDEQ strongly recommends that sponsors of HHW collection programs manage the collected waste as a Subtitle C hazardous waste, that is, it shall be managed at a facility or site following the hazardous waste guidelines. Given the effort and expense put into a HHW collection program, it makes sense to ensure the greater level of personal/personnel safety and environmental protection that will result from the more stringent controls. Precautions must be taken at these sites to prevent the release of materials into the environment. Such precautions include, providing lined temporary storage areas for accumulation of the material, segregation of the various streams, using personnel trained in the management of hazardous waste, obtaining spill kits, and providing personal protective equipment.

HHW staged at a permitted solid waste facility or approved emergency debris site for scrapping/recycling shall be staged away from other solid wastes by category, such as flammable liquids and solids, corrosives, pesticides/herbicides, appliances, electronics, compressed gas cylinders, reactive materials, *etc*.

Note: An HW-1 form may be required for HHW staging sites. The form can be obtained from the LDEQ webpage at: http://deq.louisiana.gov/page/hazardous-waste. Contact the treatment, storage, and disposal facility to see if one is needed. Call (225) 219-3244, if you have questions on filling out the form. AN EPA ID number is required.

14.5 Latex Paint

Latex paint, if not recycled, may be hardened by adding an absorbent, such as cat litter or a commercial hardener and then sent to a municipal landfill.

14.6 Munitions and Ordnance

Munitions or ordnance associated with the aftermath of a disaster that remain unexploded by either malfunction, design, or any other cause, should be handled by a law enforcement trained technician in chemical or conventional munitions or explosives handling, transportation, render-safe procedures, or destruction techniques.

14.7 Orphan Drums

Contact the LDEQ Headquarters prior to staging any household hazardous waste found.

Precautions must be taken at these sites to prevent the release of materials into the environment. Such precautions include: providing lined temporary storage areas for accumulation of the material, segregation of the various streams, using personnel trained in the management of hazardous waste, obtaining spill kits, and providing personal protective equipment.

Note: An HW-1 form is required for staging of orphan drums. The form can be obtained from the LDEQ webpage at: http://deq.louisiana.gov/page/hazardous-waste. Call (225) 219-3244, if you have questions on filling out the form.

14.8 Other Hazardous Wastes

Contact the LDEQ Headquarters prior to staging any household hazardous waste found.

Hazardous wastes, such as old gasoline, oil based paints, chemicals, and solvents should be handled using a qualified hazardous waste contractor who is sending the materials to a permitted hazardous waste facility or reclaimer.

14.9 Pesticides

Residentially generated pesticides should be handled as household hazardous waste. Contact the LDAF, Waste Pesticide Program at (225) 925-6914 for pesticide questions or problems.

14.10 Small Engines

Small engines may be sent to a scrap metal processor. Efforts should be made to remove oil, fuel, and any other fluids. These removed fluids can be sent to a use oil recycler.

14.11 Treated Wood

Creosote treated telephone poles, chromated copper arsenate (CCA), or chromium trioxide wood, poles, railroad crossties, or treated wood chips must be disposed in a Type I (Industrial) solid waste landfill. **Do NOT burn or use creosote and pressure treated wood as chips, sawdust, mulch, or compost.** A list of Type I Landfills in Louisiana can be found at:
http://www1.deq.louisiana.gov/portal/DIVISIONS/WastePermits/SolidWastePermits/SolidWasteLandfillReport.aspx.

14.12 Used Oil

Used motor oil, transmission fluid, and generator oils may be recycled by contacting a registered used oil transporter. Contact (225) 219-3244 or (225) 219-0029 for a list of users.

14.13 Animal Carcasses

Animal carcasses that remain after a disaster may be burned or buried upon approval from LDEQ and LDAF. Contact the LDEQ Waste Permits Division at 225-364-7901 prior to staging any animal carcasses found. If the animal carcasses are to be sent for disposal, they must go to a Type II landfill.

14.14 Human Remains/Coffins

The local sheriff's office or coroner should be contacted to arrange proper burial/reburial of human remains and/or coffins.

15.0 Final Disposal Options

This Plan is designed to ensure that disaster-generated debris that requires disposal is managed and disposed in a manner that is protective of public health and the environment. Disaster-generated debris requiring disposal shall be managed and disposed at sites that have either been permitted or authorized by the LDEQ.

Disaster-generated debris contaminated with oil (e.g., crude oil, petroleum refined product) shall be disposed in a Type I industrial solid waste landfill, except that oil contaminated marsh grass may be approved by LDEQ with local governments approval for burning on a case-by-case basis. Disaster-generated debris that is visibly covered with oil is considered oil-contaminated debris.

Putrescible waste (e.g., rotting food that has been removed unsalvageable refrigerators and freezers) shall be disposed in a Type II landfill.

The disposal of excessive accumulations of small animal carcasses shall be in accordance with the Louisiana Department of Health and Hospitals sanitary code. The disposal of large animal carcasses (e.g., horses, cows) shall be in accordance with the instructions from the LDAF.

Hazardous waste generated because of the disaster event must be separated from other disaster-generated waste and disposed at a permitted commercial hazardous waste disposal facility. Recyclables and hazardous waste must be segregated for beneficial environmental use prior to transport to a landfill. While household wastes are classified as solid wastes that are not hazardous wastes, it is imperative that the household waste collected during this event be managed not only in an environmentally sound manner but also in accordance with the appropriate LDEQ rules and regulations governing the storage and processing of this type of waste.

Asbestos-laden debris from unabated buildings pose a personal and environmental hazard and must be handled according to LAC 33:III.5151. See Appendix C-2 for LDEQ Guidance on Residential Renovations and Demolitions. Staff in the regional offices (see Appendix C-1) can be contacted with questions related to proper handling of asbestos containing materials and asbestos containing wastes.

16.0 Quarantine for Certain Insects

Emerald Ash Borer - The Louisiana Department of Agriculture and Forestry (LDAF) has a quarantine in place to prevent the spread of the emerald ash borer (EAB"), Agrilus planipennis Fairmaire (see LAC 7:XV.167). This includes the parishes of Bossier, Claiborne, Lincoln, Union and Webster as of February 2017. The quarantine limits the movement of "regulated articles" outside of the quarantine unless treated according to approved methods including fumigation, heat treatment, and chipping. "Regulated articles" include the EAB in all of its life stages; firewood of all hardwood (non-coniferous) species; nursery stock, green lumber, and other material living, dead, cut, or fallen, including logs, stumps, roots, branches, and composted and uncomposted chips of the genus Fraxinus (commonly known as "ash"); and any other article, product, or means of conveyance identified by a LDAF inspector. Ash nursery stock is prohibited from being moved outside of EAB quarantine areas as there are no acceptable treatments for nursery stock. The authorized local government or state agency is responsible to ensure that personnel and contractors hauling, staging or other otherwise managing the debris are aware of and abiding by this LDAF-issued regulation. For any questions concerning the quarantine of the EAB contact Mr. Richard Miller at 225-952-8053 or via email millerr@ldaf.state.la.us.

Formosan Termite - The LDAF has rescinded the Formosan termite quarantines for hurricanes Katrina and Rita. However, the authorized local government or state agency is responsible to ensure that personnel and contractors hauling, staging or other otherwise managing the debris are aware of any future LDAF-issued regulations regarding the management of Formosan Termites. For any questions concerning the quarantine or Formosan Termites contact Mr. Tyrone Dudley at 225-925-4578 or 504-286-1125 or email tyrone_d@ldaf.state.la.us.

ATTACHMENT A: Emergency Debris Site Request Form

Department of Environmental Quality Office of Environmental Services Waste Permits Division P.O. Box 4313 Baton Rouge, LA 70821-4313 (225) 219-3181	**LOUISIANA** **Emergency Debris Site (EDS) Request Form**	DEQ LOUISIANA

Your request **cannot** be approved unless **all** of the requested information on this form is **supplied** and **accurate**. Email form to **deqdebrisrequest@la.gov** or fax to **225-325-8236.** Email questions to **deqdebrisrequest@la.gov** or call **225-364-7901.**

TYPE OR PRINT

A. *Applicant Name* *(Governmental Agencies only)*

B. *Government Type*
☐ Parish ☐ Municipality ☐ State ☐ Federal ☐ Other, specify

C. *Agency Interest (AI) Number*

D. *Responsible Official* *(Government Official who will be responsible for site)*		*Title*
Mailing Address	*City*	*Zip*
Phone Number:	*Email Address:*	

E. *Debris Site Contact* (*will receive all mail correspondence, must be government employee)*		*Title*
Mailing Address	*City*	*Zip*
Phone Number:	*Email Address:*	

F. *Physical Location* *(identify by street number, by intersection of roads, or by mileage and direction from an intersection.)*
Is a site map attached (REQUIRED)? YES ☐ ***Request will NOT be processed without one. Scale should be ~1 in. = 1000 ft.***

Address: *City/Zip Code:* *Parish*:

Note: The city name must be for the closest city in the same parish as the requested site. If the site does not have a 911 address, detailed directions must be provided from the nearest town/city and indicate specific street, road, highway, interstate, and/or location names. Indicate any landmarks and/or mile markers, if necessary. ***Request will NOT be processed without this information.***

G. *Site entrance GPS* (**required**) provide in decimal degrees	LAT:	LONG:
GPS of where activities will occur on property **(required)**	LAT:	LONG:

H. *Hours of Operation* Hours AM **to** PM	Days ☐ M-F or ☐ 7 DAYS/WK or ☐M ☐T ☐W ☐T ☐F ☐S ☐Su	**Burning will only be allowed between the hours of 8 AM and 5 PM.**

I. *Requested Activities* (check all potential activities)

Staging/ Segregation:	☐ C&D debris ☐ woodwaste	☐ metals ☐ tires	☐ white goods ☐ electronic waste ☐ vegetative debris	**Composting:**	☐ vegetative debris
				Chipping & Grinding:	☐ vegetative debris
Preparation:	☐ white goods	**Burning:**	☐ vegetative debris (open)	☐ vegetative debris (air curtain destructor)	

***** THIS PORTION OF SECTION I CAN ONLY BE COMPLETED AFTER AN EMERGENCY HAS BEEN DECLARED. *****

☐ **Other Requested Activities (Include debris types and associated activities)**

_____

***Note: Pre-approvals are limited to the debris types and activities listed above. Other debris types and activities will NOT be approved until after an emergency has been declared. This includes, but is not limited to, staging and/or disposal of household hazardous waste, orphan drums, vessels, vehicles, or animal carcasses. If more activities are needed after an emergency has been declared, a new request must be filled out and submitted for approval. Contact the LDEQ prior to submitting "Other" requests.**

J. *Site Type*	**YES**	**NO**
Is the site being requested for use as a **pre-approved emergency debris site** (to be requested *before* an emergency, can be reused multiple times)?	☐	☐
Is the site being requested as a **temporary emergency debris site** (to be requested *after* an emergency for a single time use)? If yes, list the emergency name or FEMA #. _____	☐	☐

K. *General Site Questions* (The request form **cannot** be processed without answers to questions 1 – 5.)	**YES**	**NO**
1. Was this site approved for use in a prior disaster? If yes, which disaster and when did the disaster occur?	☐	☐
2. Is the requested site activity (ies) a modification of previously approved activities?	☐	☐
3. Have the site and surrounding area conditions changed (e.g., added development) since the last prior use? If yes, explain.	☐	☐
4. *(If requesting burning)* Is the site being requested by a municipality? Is the site being requested by a parish for a location in another parish? • If the answer to *either is yes*, is the site within the applicant's jurisdictional limits? • If the site is **outside the jurisdictional limits, a parish burn approval must be submitted**. The parish burn approval should be for the full time burning is expected (e.g., disaster, pre-approval) and should specifically state the site location requested before a request for burning will be approved by the LDEQ. ☐ A copy of the **parish burn approval is attached**.	☐ ☐ ☐	☐ ☐ ☐
5. **Is this a new EDS request, amended request expanding the EDS area**, **an EDS with no State Historic Preservation Office (SHPO) approval**, or **an EDS with SHPO approval that is five (5) years or older**? • **If yes**, fill out a new SHPO site request form on page 4; **if no**, attach a copy of the current SHPO approval.	☐	☐

L. *Siting Criteria* (All questions must be answered and explained, as necessary.)	**YES**	**NO**
1. Are there nearby residences and/or businesses that will be inconvenienced or adversely affected by use of the site? If yes, explain.	☐	☐
2. Are there any site safety issues? (e.g., power lines, pipelines) If yes, explain.	☐	☐
3. Are any erosion and/or rainwater runoff control measures needed? If yes, explain.	☐	☐
4. Is additional containment necessary for any wastes that have a potential for leaking? (e.g., white goods leaking Freon) If yes, explain.	☐	☐
5. Are the roadways and entrance to the site suitable for trucks hauling debris? If no, explain.	☐	☐
6. Is the site fully accessible to fire personnel and equipment? If no, explain.	☐	☐
7. Is the size of the site sufficient for its intended use? If no, explain.	☐	☐
8. Is the general terrain of the site suitable for the proposed activities? If no, explain.	☐	☐
9. Is the proposed site located outside of the 100-year floodplain and wetlands? (The floodplain map used shall be an original Flood Insurance Rate Map prepared by FEMA, the Flood Prone Area Map prepared by the US Geological Survey or a National Wetlands Inventory map that depicts the limits and elevations of any 100-year floodplain or wetland on or adjacent to the proposed site.) If no, explain.	☐	☐
10. For chipping & grinding, is the proposed site more than 300 feet to residences, businesses, schools, hospitals, clinics, and roads? If no, explain.	☐	☐
11. For burning, is the proposed site more than 1,000 feet to residences, businesses, schools, hospitals, clinics, and roads? If no, explain.	☐	☐
12. Is the proposed site more than 100 feet to property boundaries and on-site structures? If no, explain.	☐	☐
13. Is the proposed site more than 250 feet to potable water wells? If no, explain.	☐	☐
14. Is the proposed site more than 100 feet to nearby surface waters? If no, provide the name of the nearest surface water, if it is named.	☐	☐
15. Is the proposed site more than 10,000 feet to the nearest airport? If no, provide the name of the airport.	☐	☐

M. *Site Operator*	Company Name:	Site Contact Person:
	Telephone Number:	Email Address:

N. *Site Owner*	Name:	Address:
	Telephone Number:	Email Address:

O. *Certification of Responsible Official*

I certify that I have personally examined and that I am familiar with the information submitted in this request. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information.

I certify that the site as described in this request meets the applicable requirements and will comply with the following: 1) the Comprehensive Plan for Disaster Clean-up and Debris Management; 2) the effective Declarations of Emergency and Administrative Order; and 3) the subsequent Authorization for the Emergency Debris Site.

I understand that I am responsible for notifying First Responders (911 Center, Fire & Rescue, Law Enforcement, and EMS) of the site entrance location and activities at this site.

SIGNATURE (Responsible Official)	**PRINT**	**DATE**

LSHPO Site Request Form

If this is a new EDS request, amended request expanding the EDS area, an EDS with no State Historic Preservation Office (SHPO) approval, or an EDS with SHPO approval that is five (5) years or older, fill out the form below and return it to LDEQ with the EDS form. LDEQ will submit the form to SHPO. Once approved SHPO, will return the approved form to the applicant.

Requirements for Debris Activities Involving Ground Disturbance

Requesting Registration as a (check all that apply):

☐Staging Site ☐Chipping & Grinding Site ☐Composting Site ☐Burn Site ☐Disposal Site

If the creation or use of this **emergency** staging, chipping & grinding, composting, burning, and/or disposal site will include ground disturbance, including the creation of temporary access roads, burying of debris or burn residual, or will impact structures over 45 years old, the applicant must coordinate with, and receive comments from, the Louisiana Office of Cultural Development, State Historic Preservation Office (SHPO), prior to the start of any ground disturbance. **Individual certifications are required for each burning, burial, disposal, and/or staging or stockpiling site. Attach a map, in addition to this form, preferably a copy of a USGS 7.5 minute series quadrangle map with the project site location clearly identified.**

Applicant	Name:		Address:	
	City:	Zip:	Parish:	
	Telephone Number:	Fax Number:	Email Address:	
Location of Emergency Site *(complete **one** row)*	Township:	Range:	Section:	Quarter-section(s):
	Latitude (decimal degree):		Longitude (decimal degree):	
	UTM Northing:		UTM Easting:	
Site Owner	Name:		Address:	
	Telephone Number:		Email Address:	

Is a **NEW** road needed to access the requested site? ☐Yes ☐No If yes, show road on map and provide the following information:
Road length and width: ***and*** Latitude: and Longitude: ***or*** UTM Northing: and Easting:

Discovery Clause: In the event that archaeological deposits (soils, features, artifacts, other remnants of human activity) are uncovered in urban or rural areas, or if archaeological deposits are found in tree root balls during removal, the project shall be halted and the applicant shall stop all work immediately in the vicinity of the discovery and take reasonable measures to avoid or minimize harm to the finds. The applicant will inform the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) immediately at 225-925-7500 and SHPO at 225-342-8170, and will secure all archaeological findings and restrict access to the area. GOHSEP and SHPO will be responsible for notifying the appropriate Native American Tribes if the site is determined to be Native American. Work may not resume until the Applicant is notified by the Division of Archaeology.

In the event that human remains or an unmarked burial site are encountered, under the terms of the Louisiana Unmarked Human Burial Sites Preservation Act (R.S. Statute 8:671), the applicant will immediately stop all work, secure all artifacts and remains, restrict access to the area, and notify GOHSEP, SHPO, and local law enforcement. GOHSEP and SHPO will consult with the appropriate Native American Tribes if the remains are determined to be Native American. No artifacts or human remains will be removed from the site until all parties have consulted to determine the proper course of action. Work may not resume until the Applicant is notified by the Division of Archaeology.

I certify that (Applicant) _____is an authorized representative for the site and will comply with all the above conditions.

_____	_____	_____
Signature	**Print**	**Date**

Contact Information: Louisiana Office of Cultural Development State Historic Preservation Office **ATTN:** Rachel Watson P.O. Box 44247 Baton Rouge, Louisiana 70804-4242 Telephone: (225) 342-8170 email: section106@crt.la.gov	**Louisiana State Historic Preservation Office Use ONLY** I certify that the above referenced site: ☐ will have no effect on known historic properties. ☐ will have no adverse effect on known historic properties. ☐ could have an impact to a historic property; further consultation with SHPO is necessary. _____ _____ **SHPO Official** **Date**

ATTACHMENT B: Weekly Debris Management Report

Instructions for completing the Weekly Debris Management Report (WDMR)*

The State of Louisiana Comprehensive Plan for Disaster Clean Up and Debris Management mandates that vegetative debris intended for final disposal in a landfill shall be reduced fifty percent by volume and fifty percent by weight prior to transport to the landfill (See La. R.S. 30:2413.1).

In an effort to encourage recycling, the beneficial use of vegetative debris, and the efficient management of debris, the Department of Environmental Quality (LDEQ) will require all emergency debris sites to submit a Weekly Debris Management Report (WDMR). These weekly reports will indicate the volume and weight of debris received, processed, recycled, and finally disposed in a landfill.
Volumes and weights can be determined using the following methods:

1. **Debris Volume** (cubic yards) is the most common measure for the reporting of vegetative debris. If a scale is used to determine the debris weight, the following conversation factor can be used to convert tons to cubic yards:

   Tons of debris × 6 = cubic yards of debris

   Please use the same method to determine the weight of received, processed, and disposed debris.

2. **Truck Capacity** = length × width × height of the truck bed.

3. **Net Truck Volume** = Truck Capacity × % full (for a full truck load assume 1).

Other approved FEMA methods may be used. Please document on the form which method is used.

4. **Volume of Vegetative Debris Received** = Sum of all Net Truck Volumes.

5. **Volume of Vegetative Debris Processed (e.g. chipped, burned)** is the quantity of the vegetative debris **received** that was sent for processing.

6. **Volume of Vegetative Debris Recycled (e.g. used as fuel)** is the quantity of the vegetative debris **received** that was sent for beneficial use.

7. **Volume of Vegetative Debris sent to a Landfill for Final Disposal** is the quantity of the vegetative debris **received** that was sent to the landfill for final disposal.

Fate of Material indicates the end result of the initial material (e.g. ash was tilled into the soil, chips were sent to a landfill to be used as daily cover, and mulch was sold).

*Please note that the Weekly Debris Management Report (WDMR) shall be submitted to LDEQ each week during operations until the emergency debris site is completely closed or de-activated and the final report has been submitted. The report must be true, accurate, and complete and must be signed and certified by a person duly authorized by the local governmental or state agency responsible for the emergency debris site. Failure to properly complete the report or submit an accurate report timely could subject the responsible party to possible enforcement action by the LDEQ.

WEEKLY DEBRIS MANAGEMENT REPORT (WDMR)

The State of Louisiana Comprehensive Plan for Disaster Clean Up and Debris Management mandates that vegetative debris intended for final disposal in a landfill shall be reduced fifty percent by volume and fifty percent by weight prior to transport to the landfill. (See La. R.S. 30:2413.1)

Please submit completed weekly debris management report (WDMR) form to the Louisiana Department of Environmental Quality each week, no later than Sunday, during operations until the debris site is completely closed and the final report has been submitted.

PARISH: _____ **SITE NAME**: _____ **SITE LOCATION:** _____

AGENCY INTEREST #: _____ **CONTACT PERSON:** _____ **PHONE NUMBER:** _____

PLEASE CHECK ONE:

☐ Initial Report ☐ Weekly Report ☐ Weekly Report no activity this week ☐ Revised Report for monitoring period listed below ☐ Final Report site has closed operations

MONITORING PERIOD FROM _____ TO _____

VOLUME OF VEGETATIVE DEBRIS	**VOLUME IN CYs**	**FATE OF MATERIAL**
Received **THIS WEEK**		
Received TO-DATE		
Processed **THIS WEEK** via *chipping*		
Processed **THIS WEEK** via *burning*		
Processed **THIS WEEK** via *other*_____		
Processed TO-DATE via *chipping*		
Processed TO-DATE via *burning*		
Processed TO-DATE via *other*_____		
Recycle **THIS WEEK**		
Recycle TO-DATE		
Sent to landfill for final disposal **THIS WEEK**		Name of Landfill
Sent to landfill for final disposal TO-DATE		

<u>I certify under penalty of law</u> that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

_____ _____ _____

Name/Title of Responsible Party Typed or Printed Signature Date

Submit completed Weekly Debris Management Reports (WDMRs) via fax to 225.325.8210 or via email to deqdebrisreduction@la.gov. Send questions via email to deqdebrisrequest@la.gov or call 225-364-7901.

ATTACHMENT C-1: LDEQ Regional Office Contact Information

Acadiana Regional Office	Parishes Served
Regional Manager: Rhonda McCormick 111 New Center Drive Lafayette, LA 70508 **phone: (337) 262-5584** fax: (337) 262-5593 email: aroadmin@la.gov	Acadia, Avoyelles, Catahoula, Concordia, Evangeline, Grant, Iberia, Lafayette, LaSalle, Rapides, St. Landry, St. Martin, St. Mary, Vermilion
Capital Regional Office	**Parishes Served**
Regional Manager: Bobby Mayweather PO. Box 4312 Baton Rouge, LA 70821-4312 **phone: (225) 219-3600** fax: (225) 219-3695 email: croadmin@la.gov	Ascension, Assumption, East Baton Rouge, East Feliciana, Iberville, Livingston, Pointe Coupee, St. Helena, St. James, Tangipahoa, West Baton Rouge, West Feliciana
Northeast Regional Office	**Parishes Served**
Regional Manager: Larry Baldwin 508 Downing Pines Road West Monroe, LA 71292-0442 **phone: (318) 362-5439** fax: (318) 362-5448 email: neroadmin@la.gov	Caldwell, East Carroll, Franklin, Jackson, Lincoln, Madison, Morehouse, Ouachita, Richland, Tensas, Union, West Carroll, Winn
Northwest Regional Office	**Parishes Served**
Regional Manager: Larry Baldwin (acting) 1525 Fairfield, Room 520 Shreveport, LA 71101-4388 **phone: (318) 676-7227** fax: (318) 676-7573 email: nwroadmin@la.gov	Bienville, Bossier, Caddo, Claiborne, De Soto, Natchitoches, Red River, Sabine, Webster
Southeast Regional Office	**Parishes Served**
Regional Manager: Brian Tusa 201 Evans Road, Building 4, Suite 420 New Orleans, LA 70123-5230 **phone: (504) 736-7701** fax: (504) 736-7702 email: seroadmin@la.gov	Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. John the Baptist, St. Charles, St. Tammany, Terrebonne, Washington
Southwest Regional Office	**Parishes Served**
Regional Manager: Billy Eakin 1301 Gadwall Street Lake Charles, LA 70615 **phone: (337) 491-2667** fax: (337) 491-2682 email: swroadmin@la.gov	Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis, Vernon

ATTACHMENT C-2:
LDEQ LESHAP Guidance on Residential Renovations and Demolitions

The <u>renovation</u> or <u>demolition</u> of a <u>residential structure</u> that has <u>five or more dwelling units</u> is regulated under LAC 33:III.5151. Emission Standard for Asbestos (See definitions below).

If a structure that is being renovated or demolished is **<u>a residential building with four or fewer dwelling units</u>**, answer the questions below to determine if LAC 33III.5151 applies:

Is the structure being intentionally demolished or renovated as part of a commercial or public project*****, such as urban renewal or highway right-of-way projects or intentionally burned?

No **Yes** → **Regulated under LAC 33:III.5151**

↓

Is the structure part of an installation (any building or structure or any group of buildings or structures at a single demolition or renovation site that is part of a planned project that are control of the same owner or operator)?

No **Yes** → **Regulated under LAC 33:III.5151**

↓

Has it ever been used as an institutional, commercial, public, or industrial structure?

No **Yes** → **Regulated under LAC 33:III.5151**

↓

Is it being converted to an institutional, commercial, public, or industrial structure?

No **Yes** → **Regulated under LAC 33:III.5151**

↓

LAC 33:III.5151. Emission Standard for Asbestos does <u>not</u> apply.

Renovation—altering a facility or one or more facility components in any way, including the washing, stripping, or removal of RACM from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Demolition—the permanent wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

***** A <u>public project</u> is a planned renovation or demolition of two, or more, residential buildings at the same time by a government entity. For example, two or more specific residential structures on the same request for bids and those renovations and demolitions funded by a FEMA PW would constitute a public project.

ATTACHMENT D: Authorization for Pre-approved Emergency Debris Site

Pre-approval Number: ###
Agency Interest Number: ###

State of Louisiana
Department of Environmental Quality
Office of Environmental Services
Administrative Order

Authorization for Pre-approved Emergency Debris Site

The Louisiana Department of Environmental Quality (LDEQ) recognizes that immediately following a natural disaster, the time required to choose, approve, and prepare emergency debris sites to receive debris can significantly delay the removal of emergency-generated debris from affected areas. LDEQ aims to reduce these delays by authorizing local governments and state agencies to activate emergency debris sites immediately after the declaration of an emergency by the Secretary of LDEQ.

Therefore, I hereby authorize the <<Local Government or State Agency>> to conduct **<<approved activity>> of <<type>> debris** at the site described below, in compliance with the requirements and conditions set forth in Appendix A. Part XI. Section(s) <indicate which section(s)>, if and when LDEQ declares that an emergency exists (**Appendix A can be found at, and must be printed from, the LDEQ webpage at http://www.deq.louisiana.gov/resources/category/debris-management**).
Only the authorized activities listed above shall be conducted at the debris site.

Site Name:	<<Site Name>>
Location:	<<Site Address>> in <<municipality>>, <<Parish>>
Front Gate:	Latitude: <<latitude>> and Longitude: <<longitude>>
Agency Interest Number:	AI ##
Pre-approval Number:	PEDS##

[Delete if not applicable]**The following specific requirements are required:** <NO DATA FOUND>

LDEQ may approve additional staging activities on a case-by-case basis during an emergency.

This Order and the authorization to operate a pre-approved emergency debris site (for a period of 2 years) shall expire on June 1, 2019, unless otherwise notified in writing by LDEQ.

Issued and Effective on _____

Elliott B. Vega
Assistant Secretary

State of Louisiana
Department of Environmental Quality
Office of Environmental Services

Administrative Order
Authorization for Pre-approved Emergency Debris Site

APPENDIX A
Requirements and Conditions

I. EMERGENCY DECLARATIONS

The governor may declare that an emergency exists in specified areas, resulting from natural or manmade events. Similarly, the President of the United States may declare certain areas to be disaster areas.

In order to obtain financial and technical assistance for managing an emergency through the Federal Emergency Management Agency (FEMA), a request for federal financial assistance must be made through FEMA (see FEMA website at http://www.fema.gov). FEMA requires that all emergency-generated debris be managed on state approved debris sites. This order will fulfill that requirement and allow cleanup operations to commence immediately following a LDEQ emergency declaration. Debris approved for receipt at approved emergency debris sites consists of C & D debris, electronic waste, scrap metals, tires, white goods, vegetative debris, and woodwaste. The debris that shall be received at an approved emergency debris site is limited to *only* disaster-generated debris and does not include any debris for which the site is not approved or any debris not included in the definition of the authorized debris type. Unauthorized debris at debris sites includes, but is not limited to, vessels and vehicles, household hazardous waste, orphan drums, and animal carcasses. (NOTE: Any amendments to this Administrative Order authorizing additional debris management shall be limited to the duration of the declared emergency.)

- **C & D debris** approved for receipt at approved emergency debris sites is nonhazardous waste generally considered not water-soluble, including but not limited to, metal, concrete, brick, asphalt, roofing materials (shingles, sheet rock, plaster), or lumber from a construction, remodeling, repair, renovation, or demolition project. C & D debris does not include regulated asbestos-containing material RACM as defined in LAC 33:III.5151.B, white goods, creosote-treated lumber, and any other item(s) not an integral part of the structure.

- **Electronic wastes** approved for receipt at approved emergency debris sites are devices or components thereof that contain one or more circuit boards and are used primarily for data transfer or storage, communication, or entertainment purposes, including but not limited to, desktop and laptop computers, computer peripherals, monitors, copying machines, scanners, printers, radios, televisions, camcorders, video cassette recorders (VCRs), compact disc players, digital video disc players, MP3 players, telephones, including cellular and portable telephones, and stereos.

- **Metals** (or scrap metals) approved for receipt at approved emergency debris sites are bits and pieces of metal parts (e.g., bars, turnings, rods, sheets, wire) or metal pieces that may be combined together with bolts or soldering (e.g., radiators, scrap automobiles, railroad box cars), which when worn or superfluous can be recycled. Materials not covered by the definition of scrap metal include ”residues” generated from smelting and refining operations (e.g., drosses, slags, and sludges), liquid wastes containing metals (e.g., spent acids, caustics, or other liquid wastes with metals in solution), liquid metals wastes (e.g., liquid mercury), or metal-containing wastes with a significant liquid component, such as spent batteries.

- **Tires** approved for receipt at approved emergency debris sites are whole tires (i.e., the continuous solid or pneumatic rubber covering encircling the wheel of a motor vehicle or off-road vehicle) that are no longer suitable for their original purpose because of wear, damage, or defect. These do not include any tire weighing over 500 pounds and/or a solid tire.

- **White goods** approved for receipt at approved emergency debris sites consist of discarded domestic appliances including, but not limited to, refrigerators, ranges, washers, freezers, dryers, air conditioning and heating units, freestanding ice makers, built-in stove surface units and oven units, and water heaters. White goods do <u>not</u> include small household appliances, such as, stand mixers, toasters, blenders, etc.

- **Woodwaste** approved for receipt at approved emergency non-vegetative debris sites consists of types of waste generated by sawmills, plywood mills and woodyards associated with the lumber and paper industry, such as wood residue, cutoffs, wood chips, sawdust, wood shavings, bark, wood refuse, wood-fired boiler ash, wood ash, and plywood or other bonded materials that contain only polyurethane, phenolic-based glues, or other glues that are approved specifically by the administrative authority. Uncontaminated, un-treated or un-painted lumber, board road lumber, or wooden pallets are considered woodwaste under this definition.

- **Vegetative debris** approved for receipt at approved emergency debris sites consists of vegetative matter resulting from landscaping, landscape maintenance, right-of-way or land-clearing operations, including trees and shrubbery, leaves and limbs, stumps, grass clippings, and flowers.

For debris removal to be eligible for FEMA funding, the work must be necessary to: eliminate an immediate threat to lives, public health and safety; eliminate immediate threats of significant damage to improved public or private property; and to ensure the economic recovery of the affected community to the benefit of the community-at-large. FEMA ineligible debris consists of: debris from a previous disaster; debris related to construction; fallen trees in a forest; debris on public golf courses or cemeteries; stump removal; or removal of disaster debris from private property, unless authorized by FEMA; and any type of waste that is not listed in the debris definitions.

Upon the declaration of a LDEQ declared emergency, this order allows immediate activation of the pre-approved emergency debris site allowing for the efficient and expeditious management of emergency-generated debris. The activation is valid for the duration of the declared emergency, unless LDEQ specifies otherwise. LDEQ reserves the right to order an emergency debris site to shut down operations before termination of declarations, orders and amendments as well as to extend the timeframe where needed, on a case by case basis.

Please be advised that in the event of a disaster, the LDEQ issued Emergency Declaration and Administrative Order may contain additional restrictions and/or operating conditions applicable to the pre-approved site. This order and the Emergency Declaration and Administrative Order must be used in conjunction to operate the site. Copies of both documents must be kept onsite. If there are any questions regarding applicability or other operating restrictions or requirements, call either the LDEQ Headquarters at (225) 364-7901 or via email at **deqdebrisrequest@la.gov**.

II. COMPREHENSIVE PLAN FOR DISASTER CLEAN-UP AND DEBRIS MANAGEMENT (the Plan)

At the time of a declared emergency, adherence to the most recent approved Comprehensive Plan for Disaster Clean-up and Debris Management (the Plan) will be required by an LDEQ issued Emergency Declaration and Administrative Order (the Order), except where the Plan may be in conflict with the provisions of the Order. In the event of conflict, the Order shall prevail. Moreover, while the Plan is consistent with state and federal law, it does not supersede any ordinance adopted by a local governing authority. A copy of the most recent Comprehensive Plan for Disaster Clean-up and Debris Management can be downloaded from the LDEQ webpage at http://www.deq.louisiana.gov/assets/docs/Land/DebrisManagementPlan4815.pdf or by calling LDEQ debris inquiry at (225)-364-7901 for assistance.

III. ANNUAL CERTIFICATION

All pre-approved emergency debris site locations MUST BE certified, by the responsible official, annually (i.e., after the first year of the preapproval's issuance) using the certification form provided by the LDEQ. The certification form must be submitted to the LDEQ by June 1st of each year. The LDEQ Regional Surveillance Staff may re-inspect a site if it is indicated that the site conditions have changed within the two (2) year issuance date or at any time to assess the site and its operations. If site conditions have changed or if the surrounding area has changed enough to alter the use of the debris site, the site may be deemed no longer appropriate for the pre-approved activity and this authorization will be revoked. At that time, the local government or state agency may wish to consider pre-approval of another site in order to ensure available capacity. If additional activities or sites are wanted, an additional emergency debris site request form must be submitted to LDEQ and written approval must be obtained before the additional activity can be conducted on site. Failure to comply may result in revocation of the pre-approval.

IV. SITE ACTIVATION REQUIREMENTS

Upon the declaration of an emergency by LDEQ, local governments and state agencies may "activate" a pre-approved emergency debris site for the activities specified in this order. Upon activation, the governmental body shall notify LDEQ Headquarters at (225) 364-7901 that the site is being activated. This verbal notification shall occur as soon as practicable depending on communication capability. If LDEQ Headquarters does not have communication capability, please call one of LDEQ's other regional offices listed in Appendix B. (Appendix B can be found at, and must be printed from, the LDEQ webpage at http://ldeq.org/resources/category/debris-management.)

The governmental body shall provide written notification to the regional office (see Appendix B) and headquarters within 5 days of the activation date. The contact information for headquarters is Estuardo Silva, Waste Permits Administrator and can be: mailed to Louisiana Department of Environmental Quality, Post Office Box 4313, Baton Rouge, LA 70821-4313; faxed to (225) 325-8236, or emailed to deqdebrisrequest@la.gov. A form for the written notification is provided in the cover letter with this document and can also be found at the following link http://deq.louisiana.gov/assets/docs/Land/WDMR.docx. The LDEQ regional office surveillance staff will conduct an initial assessment for damages to the site as a result of the disaster and changes that may have occurred at the debris site or to the surrounding area since the pre-approval assessment or the annual re-certification that may change the suitability of the emergency debris site. If for any reason the emergency debris site is found to be unsuitable, the authorized local government or state agency will be given the option to request approval of another emergency debris site by modification of this order, or request termination of this order. The LDEQ regional office surveillance staff will periodically monitor the emergency debris site throughout the emergency cleanup and handle the site de-activation once the operations have ceased and the site use is no longer needed for the emergency.

V. REDUCTION REQUIREMENT

Emergency vegetative debris site operations must conform to the legislative mandate (R.S. 30:2413.1), which requires that "the total green and woody debris intended for final disposal in a landfill, shall be reduced fifty percent by weight and fifty percent by volume prior to transport to a landfill" (for disposal). The goal of the statute is to "reuse and recycle material and to divert debris from disposal in landfills to the maximum extent practical, efficient, and expeditious in a manner that is protective of human health and the environment." Every effort shall be made to consolidate emergency-generated vegetative debris in an attempt to beneficially use as much of the material as possible. Emergency-generated vegetative debris may be chipped or otherwise reduced by volume to allow for composting, use by local industries for fuel, or use by landfills as part of daily cover (not final cover) at landfills, or for other beneficial reuse.

VI. EXPIRATION OF THE EMERGENCY DECLARATION

These emergency debris sites can only be used for managing authorized debris generated in a disaster. The amount of time an emergency debris site can be active is limited by the expiration of an LDEQ issued Declaration of Emergency. The purpose of the deadline is to insure that storm related activities are completed in a timely manner. All activities authorized under this order must cease and the emergency debris site shall be restored to its previous condition and use upon the expiration of the Declaration of Emergency unless otherwise approved by LDEQ in response to a written request from the authorized local government or state agency. The emergency debris site is only intended to operate as a temporary emergency debris site, not as an ongoing solid waste facility.

VII. SITE DE-ACTIVATION

Once operations have ceased, the emergency debris site must be restored to its previous condition and use in accordance with the Comprehensive Plan for Disaster Clean-up and Debris Management as directed by LDEQ.

Each emergency debris site, with the exception of those where ash is land-applied, will eventually, to the extent practicable, have emergency-generated debris cleared and shall be restored to its previous condition and use. Restoration of a site involves removing all traces of the operations and possible remediation of any contamination that may have taken place during the operations. Debris processing equipment, storage tanks, protection berms, and other structures built on the debris site shall be removed from the debris site upon completion of all debris removal and processing operations. The emergency debris site must be restored to its previous environmental state.

The authorized local government or state agency shall notify the appropriate LDEQ regional manager once all operations on the emergency debris site have ceased and the debris site has been restored to its previous condition and use, in order to set up a date and time for a final assessment. A representative with the local government or state agency shall be present at the time of the final assessment unless otherwise indicated by the LDEQ regional manager or surveillance staff.

Any environmental concerns noted at the debris site at the time of the final assessment, will be brought to the local government's or state agency's attention and shall be removed (e.g., unauthorized debris) or remediated (e.g., petroleum spills) in a timely manner, (no later than thirty (30) days from the official written request by LDEQ surveillance staff) or the governmental body will face possible enforcement action. An emergency debris site *will not* be de-activated until all environmental contamination is removed from the site.

There may be times when processed chips and mulch are stockpiled with no final disposal. In this case, the local government or state agency shall remove it in a timely manner (within 30 days from the day operations ceased) or shall request and receive approval of a voluntary Best Management Practice (BMP) through the Department of Agriculture and Forestry before the site can be de-activated.

VIII. DE-ACTIVATION LETTER

Once a final assessment is conducted and all reporting requirements have been received, reviewed and verified complete, a de-activation letter will be issued by LDEQ indicating that the emergency debris site is considered de-activated by LDEQ. After the emergency debris site has been officially de-activated by the issuance of a de-activation letter, the local government or state agency shall not accept or process at that site any additional emergency-generated vegetative debris from that declared emergency. If the local government or state agency wishes to reactivate the emergency debris site for the same declared emergency, it must request, in writing, the approval of LDEQ.

IX. DUTY TO RE-SUBMIT A REQUEST FOR AUTHORIZATION

If the governing body wishes to continue the authorization for a pre-approved emergency debris site after the expiration date of this order, the governing body must re-submit a request form. The request form shall be submitted at least 180 before the expiration date of the existing order in order to prevent a lapse in authorization.

X. GENERAL REQUIREMENTS AND CONDITIONS

A. Property rights

The authorization to use a location as an emergency debris site *does not* make LDEQ liable for damages to private property. The authorized local government or state agency is responsible for obtaining the appropriate lease agreement or other authorization from the owner of the property, if applicable.

B. Lease agreement

The local government or state agency is responsible for obtaining and maintaining any necessary lease agreement for the duration of this order, where applicable. LDEQ shall be notified if the lease should be terminated. The local government or state agency will have the option to request modification of this order by requesting another emergency debris site, or to request termination of this order.

C. Changes to the emergency debris site and surrounding area

Through the duration of this order, any changes made to the debris site or to the surrounding area that would change the suitability of the site (e.g., an increase in the number of residences or commercial structures within 1000 feet from the site) for the approved activity shall be reported to LDEQ within 30 days of becoming aware of the change.

D. Change in activity

The emergency debris site is limited to the approved activity(s) indicated on the first page of this order. For approval of an additional activity, the local government or state agency shall submit a modification for the new activity. The new activity shall *not* commence at the site until a verbal or written approval is received from LDEQ (for burning, a written approval must be received before the activity can commence).

E. Responsibility of the authorized local government or state agency

To meet overall debris management strategy goals and to ensure that the emergency debris site operates efficiently, the management of the debris site shall be under the direction of the local government or state agency. It is imperative that the debris collected, as a result of an emergency, be managed not only in an environmentally sound manner, but also in accordance with the appropriate LDEQ rules and regulations governing the segregation, storage and processing of debris (a solid waste). The local government or state agency is responsible for maintaining compliance with this order and all other environmental rules and regulations for the duration of the emergency. The local government or state agency is responsible for making sure that the site operator(s)/contractors, having day-to-day operational control over the emergency debris site of the authorized activities, are aware of the requirements of this order and all other environmental rules and regulations. Failure to comply with these rules and regulations may result in a formal referral to the LDEQ Enforcement Division and the possible issuance of compliance orders and/or assessment of civil penalties.

F. Best management practices (BMPs)

No debris site shall be de-activated with processed debris material remaining on the site until a BMP is approved for the debris (see Site De-activation, Section VII).

G. Right to inspect
LDEQ reserves the right to inspect the site operations at all reasonable times without prior notice. Denial of entry, for any reason, may result in enforcement action.

H. Reopener clause
Should the authorized local government or state agency fail to adhere to this order or any other environmental rules or regulations, LDEQ reserves the right to reopen and modify this order to add additional conditions necessary to reduce any and all human health or environmental impacts. Non-compliance with any portion of this order may result in the issuance of compliance orders and/or assessment of civil penalties.

I. Conditions injurious to public health or the environment
Should conditions at the debris site become injurious to public health or the environment, then the emergency debris site shall be de-activated until conditions are corrected or the site will be permanently closed. If permanently closed, the closure of the emergency debris site shall be in accordance with the site de-activation requirements (see Section VII).

J. Copy of authorization
A copy of this order shall be kept on site at all times and made available upon request by an LDEQ Surveillance inspector or other LDEQ representatives.

K. Debris sites located and operated at permitted landfills
Emergency-generated vegetative debris may be transported to an LDEQ approved emergency debris site (requested by a local government or a state agency) located at a permitted landfill for staging or reduction; however, the debris may *not* be placed directly into a cell for final disposal. Vegetative debris may be placed into a cell for final disposal once reduced (with the exception of root balls due to the difficulty in reduction by burning and chipping). The vegetative debris shall be reduced by an LDEQ approved method before being placed in the cell(s). The non-vegetative debris may be placed directly into a cell for final disposal *if* the landfill is permitted to dispose of that type of waste. If the landfill is not permitted for the disposal of the non-vegetative debris, the debris must be transported to a landfill permitted for its disposal.

L. Recordkeeping and reporting requirements
Recordkeeping is the responsibility of the local government or state agency. Load tickets representing the amount of vegetative debris received, processed, and/or disposed; transport and disposal documentation of all unauthorized waste segregated out from the vegetative debris received; and weekly debris management reports shall be made available to LDEQ upon request.

From activation to de-activation of the emergency debris site, SPOC documentation shall be kept of any petroleum spills from fueling equipment, hydraulic fluid spills from equipment breakdowns, and any other spills (including those from electronic waste or white goods, such as refrigerants) causing an environmental impact on the emergency debris site.

From the time of activation until de-activation, the authorized local government or state agency shall report all emergency-generated vegetative debris received each day from a Friday to a Friday on a Weekly Debris Management Report (WDMR) form and submit it to LDEQ every Sunday (unless

otherwise directed by LDEQ). These reports indicate how much vegetative debris is received, what method(s) or process is utilized (i.e. chipping, grinding, composting, and/or burning), how much vegetative debris is processed, a complete record of the waste stream, which shall include the final fate of the waste stream (i.e. industrial boiler fuel, compost/mulch, component of the daily cover system at landfills, ash tilled into soil, etc.).

The reported data will be reviewed for accuracy and consistency from one week to the next. All reports that *do not* reflect accuracy and consistency must be revised and re-submitted, which could impede the de-activation process for the emergency debris site.

M. Signature certification on Weekly Debris Management Reports

The WDMRs must be signed and certified by a person duly authorized by the local government or state agency responsible for the emergency debris site. For a municipal, state, federal or other public agency, the WDMR shall be signed by either a principal executive officer or ranking elected official. The signature authority may be delegated to someone else in writing by the local government or state agency. However, the local government or state agency will be responsible for the weekly submittal, the accuracy of the information being submitted, and the consistency of the submittals.

N. Signs

1. **Identification signs.** The local government or state agency shall post a 2 foot by 3 foot weather resistant sign readable from the roadway near the main entrance of the emergency debris site as soon as possible following an emergency. If posting the sign near the main entrance is infeasible due to safety concerns, the sign shall be posted in a publicly accessible location near the activity and moved as necessary. However, the signs shall be posted at all times until the closure assessment has been conducted by LDEQ Regional office surveillance staff.

   The sign shall contain the following information:
   - The name of the debris site (as listed on the order).
   - The Agency Interest (AI) Number (as listed on the order).
   - The approved activity (as listed on the order).
   - Local Government or State Agency contact information.

2. **Trailblazer signs.** If the debris site does *not* contain a 911 address and/or is located in a secluded area which is difficult to locate, then weather resistant trailblazer signs in a location and height visible to motorists shall be posted on the primary roadway that provides the most direct route in close proximity to the debris site. Trailblazer signs are used to direct motorists unfamiliar with an area to a specific location.

3. **Site closed sign.** Upon cession of site operations, the local government or state agency shall post a 2 foot by 3 foot weather resistant sign readable from the roadway near the main entrance of the emergency debris site stating, 'This site is closed. No dumping.'

O. Multiple operations

If multiple operations (i.e., local government and state agency authorized emergency debris sites) are being conducted at the same location, each operation's boundaries shall be physically located separate

from each other; the operational parameters clearly marked off (i.e., earthen berms, temporary barriers, orange plastic fencing, etc.); and signs clearly posted separating each operation (in addition to the entrance sign mentioned above) and maintained from the date on which the activation of the emergency debris site was approved until de-activation of each individual operation. Additionally, if more than one debris type is authorized for a site, each debris type shall be staged and processed separately from other debris types.

P. Overlap of emergencies

When one declared emergency overlaps another declared emergency, the local government or the state agency must make sure that the location is large enough to handle the expected emergency-generated debris from both emergencies. If not, another emergency debris site shall be requested. The debris streams from both emergencies shall be kept separate on the weekly debris management reports.

Q. Normal site operations

If the location of an emergency debris site is used for other normal day-to-day activities, those activities shall be maintained separate from the emergency debris site operations. For the purpose of inspections, boundaries shall be placed between the two activities and clearly marked (e.g., temporary barrier fencing, perimeter markers).

R. Public access/trespassing

To prevent unauthorized access and dumping, adequate security and monitoring shall be established and maintained, from the activation of the emergency debris site until the site is officially de-activated, to prevent unauthorized access and dumping. Temporary measures shall be taken to limit access to the debris site, which could consist of the use of trucks, equipment, gates, cables, or swing pipes to block entry. These measures shall be installed as soon as possible for permanent access control, if the site is to be used for longer than two (2) weeks. If necessary, "no trespassing" signs shall be posted to prohibit public dumping of debris.

S. Unauthorized non-vegetative debris and other unauthorized wastes

Incoming waste loads containing unauthorized debris/wastes shall *not* be unloaded at the emergency vegetative debris site. Such waste shall be re-directed to an appropriate permitted disposal facility or an appropriate temporary storage container that prevents leachate from escaping or soil and/or groundwater contamination. If unauthorized debris is inadvertently or illegally dumped at the emergency debris site, it is the responsibility of the local government or state agency to remove and properly dispose of the debris. "No dumping" signs should be placed around the perimeter of the emergency debris site to prevent dumping of unauthorized waste. Records shall be kept of the transportation and the disposal of the unauthorized waste segregated from the authorized debris received.

T. Segregation of debris

Authorized debris consists of C & D debris, electronic waste, scrap metals, tires, white goods, woodwaste, and vegetative debris as defined in Appendix A, Part I. It does *not* include any debris for which the site is not approved or any debris not included in the definition of the authorized debris type.

All unauthorized debris received at an authorized debris site shall be segregated and removed within 7 days from receipt and disposed of in an approved permitted landfill. Unauthorized debris should be stored in an appropriate container on site until it is transported to a permitted landfill for disposal. Records shall be kept of the transportation and the disposal of the unauthorized waste segregated from the authorized debris received.

U. Accumulation of debris

There shall be no significant accumulation of debris allowed to occur, due to environmental and safety concerns, such as the risk of fire. The debris should be managed in an efficient manner to prevent the potential for fire hazards, risks to human health and the environment. All efforts should be made to prevent causing any kind of nuisance to the surrounding area.

V. Equipment and fuel

Equipment and fuel shall have a designated storage area and signs posted appropriately. The fuel storage area shall be designed to contain spills. If necessary, the preparation and implementation of a Spill Prevention and Control plan should be established in accordance with the provisions specified in LAC 33:IX.901-907. The Plan shall contain minimal procedures, methods, equipment, control structures and response actions necessary to protect human health and the environment.

W. Operation of equipment

All equipment (e.g., grinders, chippers, air curtain destructors, forklifts) shall be operated in accordance with the manufacturers' instructions and any applicable LDEQ authorization. A copy of the manufacturers' instructions shall be maintained on site and made available to LDEQ upon request.

X. Environmental controls

The authorized local government or state agency shall establish and maintain environmental controls in equipment staging, fueling, and repair areas to prevent and mitigate spills of petroleum products such as fuel and hydraulic fluids. Temporary storage areas for fuels shall be lined to prevent the possibility of soil and groundwater contamination in case of spills. Plastic liners shall be in place under stationary equipment such as generators and mobile lighting plants.

Where necessary, local governments and state agencies shall establish procedures to prevent and mitigate smoke (e.g., ensure burn pits are constructed properly and are being operated according to standards), dust (e.g., employ water trucks to keep dust down), noise (e.g., employ berms or other noise abatement procedures), traffic (e.g., ensure a suitable layout for ingress and egress to help traffic flow) problems that may arise, and smells (e.g., ensure refrigerators are kept sealed when not being cleaned out).

Y. Management of debris piles

Debris piles and shredded material, including chips, shall be managed in accordance with the most recent approved Comprehensive Plan for Disaster Clean-up and Debris Management.

Z. Emergency Declaration and Administrative Order

All emergency debris site requirements contained in an issued LDEQ Emergency Declaration and Administrative Order must be followed.

AA. Notification to local fire department

The local fire department shall be notified upon commencement of emergency debris site activities that receive vegetative debris.

BB. Quarantines for certain insects

Emerald Ash Borer - The Louisiana Department of Agriculture and Forestry (LDAF) has a quarantine in place to prevent the spread of the emerald ash borer (EAB"), *Agrilus planipennis Fairmaire* (see LAC 7:XV.167). This includes the parishes of Bossier, Claiborne, Lincoln, Union and Webster as of February 2017. The quarantine limits the movement of "regulated articles" outside of the quarantine unless treated according to approved methods including fumigation, heat treatment, and chipping. "Regulated articles" include the EAB in all of its life stages; firewood of all hardwood (non-coniferous) species; nursery stock, green lumber, and other material living, dead, cut, or fallen, including logs, stumps, roots, branches, and composted and uncomposted chips of the genus Fraxinus (commonly known as "ash"); and any other article, product, or means of conveyance identified by a LDAF inspector. Ash nursery stock is prohibited from being moved outside of EAB quarantine areas as there are no acceptable treatments for nursery stock. The authorized local government or state agency is responsible to ensure that personnel and contractors hauling, staging or other otherwise managing the debris are aware of and abiding by this LDAF-issued regulation. For any questions concerning the quarantine of the EAB contact Mr. Richard Miller at 225-952-8053 or via email millerr@ldaf.state.la.us.

Formosan Termite - The LDAF has rescinded the Formosan termite quarantines for hurricanes Katrina and Rita. However, the authorized local government or state agency is responsible to ensure that personnel and contractors hauling, staging or other otherwise managing the debris are aware of any future LDAF-issued regulations regarding the management of Formosan Termites. For any questions concerning the quarantine or Formosan Termites contact Mr. Tyrone Dudley at 225-925-4578 or 504-286-1125 or email tyrone_d@ldaf.state.la.us.

XI. OPERATIONAL GUIDELINES AND REQUIREMENTS

Section A. Staging of emergency-generated vegetative debris

1. **Staging only emergency debris sites**

   Approved emergency debris sites that are approved to *only* stage emergency-generated vegetative debris shall not process the vegetative debris in any manner. These debris sites shall only store the vegetative debris until such time as it is to be hauled to a processing site for reduction.

   If the local government or state agency wishes to process (e.g., chip, grind, compost, or burn) the vegetative debris, an additional Emergency debris site Evaluation & Request Form must be submitted to LDEQ and written approval must be obtained before the additional activity can be conducted on site.

   No vegetative debris from a staging debris site, except as specified in the Comprehensive Plan for Disaster Clean-up and Debris Management, shall be transported for final disposal at a landfill

without being first processed at an LDEQ-authorized processing debris site to meet the statutory mandated reductions.

2. **Pile size and temperature restrictions**
   The staging piles of unprocessed emergency-generated vegetative debris shall be limited to a reasonable and manageable height and width in order to provide a greater surface area for dissipation of heat and volatile gases, thereby minimizing the risks of spontaneous combustion. It is recommended that the size be no higher than 20 feet and base width of no wider than 30 feet.

   The temperature of the staged piles shall be limited to 160ºF or less in order to reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape.
   Frequent monitoring of the vegetative debris piles is required to maintain the height and temperature requirements at all times during the operation of the emergency debris site.

3. **Quarantines for certain insects**
   See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section B. Composting of emergency-generated vegetative debris

1. **Reducing the potential for spontaneous combustion**
   In preparing compost and/or mulch piles, care should be taken to reduce the potential for spontaneous combustion. Placing chipped or ground organic debris into piles can result in rapid microbial decomposition that generates heat and volatile gases. Temperatures in large piles containing readily degradable debris can rise to greater than 160ºF, increasing the chance of spontaneous combustion.

   Spontaneous combustion is more likely in large, dense piles under dry, windy conditions, because of a greater possibility of volatile gases building up in the piles and being ignited by the high temperatures. In order for volatile gases to escape from the piles, windrows shall not exceed a height of 6 feet and a width of 10 feet. These piles shall not be compacted. Smoking should only be allowed in designated areas well away from the combustible material.

   Turning piles when temperatures reach 160ºF can also reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape and for the contents of the pile to cool. Turning piles when temperatures decline can restore microbial activity and composting temperatures. Optimal moisture should be maintained to reduce combustibility. As a rule, optimal moisture is obtained when squeezing a handful of material yields a drop or two of water. Shredded leafy debris will decompose more rapidly and retain more heat than wood chips. Sufficient wood chips or other bulky material should be mixed with leafy material to ensure rapid diffusion of heat and gases during the early stages of decomposition.

   Large piles or windrows should be located away from wooded areas, power lines and structures. They should be accessible to firefighting equipment, if a fire were to occur. Efforts should be made to avoid driving or operating heavy equipment on large piles because the compaction will

increase the amount of heat buildup, which could increase the possibility of spontaneous combustion.

2. **Quarantines for certain insects**
   See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section C. Chipping/grinding of emergency-generated vegetative debris

1. **Buffer zones**
   The processing equipment (e.g., chippers, grinders, etc.) shall be located at least 500 feet from the nearest inhabited dwelling. The staging area and processing area shall be located at least 200 feet from the nearest property line and 250 feet from the nearest state water body (e.g., lakes, rivers, creeks, streams).

   The processed material (chips) shall be at least 100 feet from site property boundaries, on-site buildings/structures, residential dwellings, commercial or public structures, potable water supply wells, and septic tanks with leach fields.

2. **Reducing the potential for spontaneous combustion**
   In preparing compost and/or mulch piles, care should be taken to reduce the potential for spontaneous combustion. Placing chipped or ground organic debris into piles can result in rapid microbial decomposition that generates heat and volatile gases. Temperatures in large piles containing readily degradable debris can rise to greater than 160ºF, increasing the chance of spontaneous combustion.

   Spontaneous combustion is more likely in large, dense piles under dry, windy conditions, because of a greater possibility of volatile gases building up in the piles and being ignited by the high temperatures. In order for volatile gases to escape from the piles, windrows shall not exceed a height of 6 feet and a width of 10 feet. These piles shall not be compacted.

   Turning piles when temperatures reach 160ºF can also reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape and for the contents of the pile to cool. Turning piles when temperatures decline can restore microbial activity and composting temperatures. Optimal moisture should be maintained to reduce combustibility. As a rule, optimal moisture is obtained when squeezing a handful of material yields a drop or two of water. Shredded leafy debris will decompose more rapidly and retain more heat than wood chips. Sufficient wood chips or other bulky material should be mixed with leafy material to ensure rapid diffusion of heat and gases during the early stages of decomposition.

   Large piles or windrows should be located away from wooded areas, power lines and structures. They should be accessible to firefighting equipment, if a fire were to occur. Efforts should be made to avoid driving or operating heavy equipment on large piles because the compaction will increase the amount of heat buildup, which could increase the possibility of spontaneous combustion.

3. **Location of grinders**
   Properly locating grinders is critical for noise and public safety considerations. See setbacks and buffer section above for guidelines in locating grinders.

4. **Quarantines for certain insects**
   See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section D. Burning of emergency-generated vegetative debris

1. **Open burning**
   Open burning may be utilized during the initial emergency/disaster response for a reasonable timeframe to allow for the re-establishment of critical arteries for transportation, emergency response and governmental operations. This timeframe will be determined by the magnitude of the disaster.

2. **Controlled open burning**
   Controlled open burning carefully reduces vegetative debris by burning within a contained fixed area. The reduction of clean vegetative debris (vegetative debris that has been segregated with all unauthorized debris removed) presents little environmental impact.

3. **Air Curtain Destructor (ACD)**
   Air curtain destructors are an effective means of expediting the reduction of volume while substantially reducing the environmental concerns caused by open burning. The ACD method uses a pit constructed by digging below grade or burning above grade using a blower unit. The burning chamber is usually no more than 8 feet wide and 9 to 14 feet deep. The length of the pit varies depending on the debris site size and labor/equipment limitations.

4. **Portable Air Curtain Destructor**
   Portable air curtain destructors are the most efficient because the pre-manufactured pit requires little or no maintenance to complement the blower system. Portable ACDs are ideal for areas with high water tables and sandy soils as well as areas where smoke must be kept to a minimum.

5. **Setbacks and buffer zones**
   Burn areas shall be located on the emergency debris site in a manner to prevent the spread of fires to areas outside the controlled burn area. Setbacks and buffer zones must have an appropriate separation distance between the vegetative debris burn area and all surrounding brush, forestry, structures, and other debris piles for public safety and the safety of the debris operations to prevent fire hazards. A setback of at least 100 feet shall be maintained between the burn areas and the debris piles, surrounding brush, and forestry. A setback of at least 1,000 feet shall be maintained between the burn area and the nearest occupied dwelling, commercial building, or road (unless the location has been approved by the appropriate LDEQ regional office) to create a generous buffer zone for emergency vehicles in the event an emergency situation should arise.

6. **Ash**

Wood ash stored on-site shall be located at least 200 feet from incoming vegetative debris piles, processed mulch or tub grinders (if grinding is also occurring at the debris site). Wood ash shall be wetted prior to removal from an ACD device or earth pit and placed in storage. If the wood ash is to be stored prior to removal from the site, then rewetting may be necessary to minimize airborne emissions.

Wood ash to be land applied on site or off site shall be incorporated into the soil immediately upon completion of operations or sooner if the ash becomes dry and airborne. Records shall be maintained to indicate where ash is applied and the approximate quantities of ash applied. Ash shall *not* be disposed (put in a hole) on site and covered. The application of ash shall be limited to 2 to 4 tons per acre/one-time event. Ash shall be land applied in a similar manner as agricultural lime.

Ash shall not be land applied during periods of high wind in order to avoid the ash blowing off the application site. Ash shall not be land applied within 25 feet of surface waters or within 5 feet of drainage ways or ditches on sites that are stabilized with vegetation. These distances shall be doubled on sites that are not vegetated and the ash shall be promptly incorporated into the soil.

As an alternative to land application, ash may be managed at an appropriate permitted landfill after cooled to prevent possible fire. Off-site application of ash will require specific, written prior approval by the appropriate LDEQ surveillance staff before it can be transported to another site for application (see LDEQ surveillance staff contact information in Appendix B).

Whenever possible, soil test data and analysis of the ash should be available to determine appropriate application rates. Assistance in obtaining soil test data and waste analysis of ash should be available through parish offices of the LSU Agriculture Extension Service.

7. **Continued burning**

When continued burning is necessary, such burning shall utilize equipment to efficiently combust waste and reduce emissions if LDEQ or local governing authority deems the use of equipment necessary to protect public health and the environment. Local, state and federal partners associated with the vegetative burning operation will be advised of locations that have been approved for this purpose.

8. **Fire control equipment**

Appropriate fire control equipment shall be available on-site at all times that open burning is occurring.

9. **Stockpiling of vegetative debris**

There shall be *no* stockpiling of vegetative debris with the intention of one big burn event. Vegetative debris shall be burned in small controlled piles in order to control burn events within the operational timeframe allowed.

10. Burning of unauthorized debris

Burning of unauthorized debris is prohibited. Unauthorized debris is required to be segregated from the emergency-generated vegetative debris to be reduced. Emergency debris sites approved for burning vegetative debris, at which LDEQ Regional office surveillance staff have observed and documented the burning of unauthorized debris mixed in with authorized vegetative debris will *not* be allowed to land apply the ash as final disposal, but will be required to transport the ash off site to an approved permitted landfill. Until transportation off site, the ash should be stored on a plastic liner in such a manner as to prevent any potential contamination of soil and/or ground water. The authorized local government or state agency will receive a certified written notification restricting the land application of the ash and the requirement to transport the ash off site to an approved permitted landfill.

Unauthorized waste observed being burned with authorized vegetative debris may result in the authorization of the emergency debris site being terminated for the emergency and/or the pre-approval being terminated.

11. Hours of operation

Burning shall only be conducted between the hours of 8:00 a.m. and 5:00 p.m. An operator shall be on site at all times burning occurs. Piles of combustible material should be of such size to allow complete reduction in this time interval.

12. Notification

Fire-fighting personnel shall be advised of each burning event.

13. Materials used to ignite the fire

Only fossil fuels (e.g. diesel, kerosene) shall be used to ignite the fire. Heavy oils, tires, asphaltic materials, items containing natural or synthetic rubber, or any man-made materials which produce unreasonable amounts of smoke shall *not* be burned; nor may these substances be used to start a fire.

14. Prevailing winds

Prevailing winds at the time of a burn event must be away from any city, town or airport, the ambient air of which may be affected by smoke from the burning.

The location of the burn area shall be at least 1000 feet from any dwelling other than a dwelling or structure located on the property on which the burning is conducted.

15. Approved air curtain destruction

If an air curtain destructor (ACD) was approved, it *must* be used for any burning at the site, unless an exception is granted in writing from LDEQ. As per LAC 33.III.313.C, the owner or operator shall obtain all necessary permits from local and/or state agencies; the owner or operator shall install on the ACD a manufacturer's nameplate giving the manufacturer's name and the unit's model number and capacity; and material shall not be added to the ACD in such a manner as to be stacked above the air curtain.

16. Environmental controls that shall be maintained when ACDs are utilized

The emission of smoke, suspended particulate matter, uncombined water, or any air contaminants or combinations thereof, that passes onto or across a public road and creates a traffic hazard, or intensifies an existing traffic hazard condition is prohibited.

Only clean oils (e.g. diesel fuel, No. 2 fuel oil, kerosene) shall be used to ignite waste. Hazardous or contaminated unauthorized ignitable material shall not be placed in the pit. This is to prevent contained explosions.

Hours of operations are restricted from 8:00 a.m. to 5:00 p.m. each day. An operator shall be on site at all times the ACD is in operation. Piles of vegetative debris shall be of such size as to allow complete reduction in this time interval. The design standards shall be maintained and the ACD shall not be operated if any equipment is malfunctioning.

The amount of dirt on the vegetative debris shall be minimized. Vegetative debris shall not be added to the ACD in such a manner as to be stacked above the air curtain.

The following buffers shall be maintained: a minimum of 1000 feet from the ACD device to homes, dwellings and other structures (unless the location has been approved by the appropriate LDEQ regional office), 250 feet from roadways, and 200 feet from on-site storage areas for incoming vegetative debris.

The local government or state agency shall use fencing and warning signs to keep the public away from the incineration area. There shall be 1 foot high, unburnable warning stops along the edge of the pit's length to prevent the loader from damaging the lip of the incineration pit.

The fire shall be tested for proper cooling temperatures as recommended by the manufacturer.

Ash shall be removed when it reaches 2 feet below the lip of the incineration pit. The fire shall be extinguished approximately two hours before anticipated removal of the ash.

The incineration area shall be placed in an above ground or below ground pit that is no wider than 8 feet and between 9 and 14 feet deep. Above ground pits shall be constructed with limestone and reinforced with earth anchors or wire mesh to support the weight of the loaders. There shall be a 1 foot impervious layer of clay or limestone on the bottom of the pit to seal the ash from the aquifer.

The ends of the pits shall be sealed with dirt or ash to a height of 4 feet. A 12 inch dirt seal shall be placed on the lip of the incineration pit area to seal the blower nozzle. The nozzle shall be 3 to 6 inches from the end of the pit.

The airflow shall hit the wall of the pit about 2 feet below the top edge of the pit, and the debris shall not break the path of the airflow except during dumping. The pit shall be no longer than the length of the blower system and the pit should be loaded uniformly along its length.

LDEQ has adopted regulations for portable air curtain incinerators. Large scale air curtain

operations may require additional conditions or permits. Operators should be familiar with and comply with these regulations, which can be viewed and printed from LDEQ's website at http://www.deq.louisiana.gov/assets/docs/Legal_Affairs/ERC/33v03201703Air.pdf.

17. Quarantines for certain insects

See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section E. Staging and separation of emergency-generated woodwaste

1. Staging only emergency debris sites

Approved emergency debris sites that are approved to *only* stage emergency-generated woodwaste shall not process the woodwaste in any manner. These debris sites shall only store the woodwaste debris until such time as it is to be hauled to a landfill permitted to receive woodwaste. For the purposes of this administrative order, staging of non-vegetative debris is to include segregation of the debris.

If the local government or state agency wishes to process (e.g., chip, grind, or burn) the woodwaste, an additional Emergency debris site Evaluation & Request Form must be submitted to LDEQ and written approval must be obtained before the additional activity can be conducted on site. These requests should be made once the debris is collected and ready for processing. These requests will be approved on a case-by-case basis and will be heavily dependent on the contents of the staged debris. The woodwaste debris piles must be free of unauthorized waste (see woodwaste definition in Appendix A, Part I of this document).

De minimus contamination of the woodwaste should be an insignificant amount, approximately 5%, of the incoming load. In no case shall a single load exceed 10% contamination. Arrangements should be made to segregate unsuitable materials such as any treated wood. These materials should be placed in appropriate containers and transported to facilities that are approved for their receipt. If more than de minimus amounts of these wastes are present, the waste should be handled in a manner consistent with the most stringent management technique necessary for the waste stream.

2. Pile size restrictions

The staging piles of unprocessed emergency-generated woodwaste should not exceed a height of 20 feet and a width of 30 feet, which provides greater surface area for dissipation of heat.

Frequent monitoring of the woodwaste piles is required to maintain the height requirements at all times during the operation of the emergency debris site.

3. Quarantines for certain insects

See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section F. Staging/transferring and segregation of emergency-generated C & D debris

1. **Staging only emergency debris sites**
   Approved emergency debris sites that are approved *only* to stage emergency-generated C & D debris shall not process the C & D debris in any manner. These debris sites shall only store the C & D debris until such time as it is to be hauled to a permitted C & D disposal site. For the purposes of this administrative order, staging of C & D debris is to include segregation of the debris.

   De minimus contamination of the C & D debris should be an insignificant amount, approximately 5%, of the incoming load. In no case shall a single load exceed 10% contamination. Arrangements should be made to segregate unsuitable materials such as household garbage, white goods, asbestos containing materials, and household hazardous waste. These materials should be placed in appropriate containers and transported to facilities that are approved for their receipt. If more than de minimus amounts of these wastes are present, the waste should be handled in a manner consistent with the most stringent management technique necessary for the waste stream.

2. **Pile size restrictions**
   The staging piles of unprocessed emergency-generated C & D debris shall not exceed a height of 6 feet and a width of 10 feet in order to provide for the safety and protection of workers on the site.

3. **Quarantines for certain insects**
   See Section X.BB above regarding the emerald ash borer and the Formosan termite.

Section G. Staging and segregation of emergency-generated electronic waste

1. **Staging only emergency debris sites**
   Approved emergency debris sites that are approved to only stage emergency-generated electronic waste shall not process the electronic waste in any manner. These debris sites shall only store the electronic waste until such time as it is to be hauled to an electronics recycler. A list of electronic recyclers can be found on the Electronic Industries Alliance website located at http://www.ecyclingcentral.com. For the purposes of this administrative order, staging of electronic waste debris is to include segregation of the debris.

   No processing of electronics, including disassembly, should occur at the site.

   Electronic waste should be covered, to the best extent possible, from weather. It is recommended that electronic waste be staged on asphalt or concrete. However, if this is not possible, electronic waste should be staged on plastic liners to protect the soil and groundwater from potential leaks. Upon entry onto the site, electronic waste can be piled until sorted. Electronic waste should be sorted by type, for example, computers, TVs, etc. Before transportation, the electronic waste shall be stacked on pallets and wrapped or placed into gaylord boxes.

2. **Pile size restrictions**
   The staging piles of unprocessed emergency-generated electronic waste shall not exceed a height of 6 feet in order to provide for the safety and protection of workers on the site. Stacks of palleted and wrapped materials shall not exceed the height capabilities of forklifts used to move the pallets.

Section H. Staging and segregation of emergency-generated white goods

1. **Staging only emergency debris sites**
   Approved emergency debris sites that are approved to only stage emergency-generated white goods shall not process the white goods in any manner. These debris sites shall only store the white goods until such time as they are to be hauled to a disposal site. Arrangements should be made to segregate unauthorized materials. These materials should be placed in appropriate containers and transported to facilities that are approved for their receipt. For the purposes of this administrative order, staging of white goods is to include segregation of the debris.

   If the local government or state agency wishes to process white goods, an additional Emergency debris site Request Form must be submitted to LDEQ and written approval must be obtained before the additional activity can be conducted on site.

   White goods shall be stored in an area separate from other solid wastes and shall be stored in a manner that prevents vector and odor problems. Stacking of white goods is not recommended. White goods shall be separated according to type (e.g., white goods containing refrigerants, such as refrigerators, freezers and air conditioning units). Additionally, white goods containing refrigerants shall be staged on plastic liners and contained within berms to prevent contamination of the soil from refrigerants and putrescible waste. Plastic liners and putrescible waste shall be disposed of at a Type II Landfill. All white goods shall be removed from the storage facility or staging area and sent offsite for recycling, or recycled onsite, within ninety (90) days of initial receipt at the site.

2. **Preparation of white goods**
   Solid waste, including putrescible waste, should be removed from white goods before recycling. Plastic liners and putrescible waste shall be disposed of at a Type II Landfill.

   It is recommended that local governments contract with a metals and/or scrap appliance dealer to collect the white goods for recycling, as white goods may not be landfilled. All mercury switches and refrigerant must be removed from appliances by the contractor. More detailed information on mercury devices in appliances is available from LDEQ's web site at: http://www.deq.louisiana.gov/page/recycling.

   Appliances containing refrigerant, including refrigerators, freezers, and window air conditioner units, should have the refrigerant removed by refrigeration technicians certified by the Environmental Protection Agency (EPA) to prevent releases. EPA also maintains a current list of approved refrigerant reclaimers. The approval status of a refrigerant reclaimer can be confirmed by contacting EPA's Ozone Protection Hotline (800-296-1996) or by accessing EPA's Office of Air and Radiation Stratospheric Protection Division webpage:

http://www.epa.gov/ozone/title6/608/reclamation/reclist.html. More information about safe federal disposal procedures for household appliances that use refrigerants can be found at: http://www.epa.gov/Ozone/downloads/SafeDisposalBrochure.pdf.

Section I. Staging and segregation of emergency-generated metals

1. **Staging only emergency debris sites**
   Approved emergency debris sites that are approved to only stage emergency-generated metals shall not process the metals in any manner. These debris sites shall only store the metals until such time as it is to be hauled to a recycler. For the purposes of this administrative order, staging of metals debris is to include segregation of the debris.

   Metals should be covered, to the best extent possible, from weather. It is recommended that metals be staged on asphalt or concrete. However, if this is not possible, metals should be staged on plastic liners to protect the soil and groundwater from potential leaks. Upon entry onto the site, metals waste can be piled until sorted. Before transportation, the metals shall be stacked on pallets and wrapped or placed into gaylord boxes.

2. **Pile size restrictions**
   The staging piles of unprocessed emergency-generated metals shall be limited to a reasonable and manageable height of no higher than 6 feet in order to provide for the safety and protection of workers on the site. Stacks of palleted and wrapped materials shall not exceed the height capabilities of forklifts used to move the pallets.

Section J. Staging and segregation of emergency-generated tires

1. **Staging only emergency debris sites**
   Approved emergency debris sites that are approved to only stage emergency-generated whole tires shall not process the metals in any manner. These debris sites shall only store the tires until such time as it is to be removed. For the purposes of this administrative order, staging of tires debris is to include segregation of the debris. Tires should be covered, to the best extent possible, from weather, so that no water builds up that could lead to mosquito larvae.

2. **Pile size restrictions**
   The staging piles of unprocessed emergency-generated tires shall be limited to 10 feet in height, 20 feet in width, and 200 feet in length with piles separated by a minimum width of 50 feet (LAC 33:V.10525.D.8-9). Stacks of palleted and wrapped materials shall not exceed the height capabilities of forklifts used to move the pallets.

State of Louisiana
Department of Environmental Quality
Office of Environmental Services

Administrative Order
Authorization for Pre-approved Emergency Debris Site

APPENDIX B
LDEQ Regional Office Contact Information

Acadiana Regional Office	**Parishes Served**
Regional Manager: Rhonda McCormick 111 New Center Drive Lafayette, LA 70508 **phone: (337) 262-5584** fax: (337) 262-5593 email: aroadmin@la.gov	Acadia, Avoyelles, Catahoula, Concordia, Evangeline, Grant, Iberia, Lafayette, LaSalle, Rapides, St. Landry, St. Martin, St. Mary, Vermilion
Capital Regional Office	**Parishes Served**
Regional Manager: Bobby Mayweather PO. Box 4312 Baton Rouge, LA 70821-4312 **phone: (225) 219-3600** fax: (225) 219-3695 email: croadmin@la.gov	Ascension, Assumption, East Baton Rouge, East Feliciana, Iberville, Livingston, Pointe Coupee, St. Helena, St. James, Tangipahoa, West Baton Rouge, West Feliciana
Northeast Regional Office	**Parishes Served**
Regional Manager: Larry Baldwin 508 Downing Pines Road West Monroe, LA 71292-0442 **phone: (318) 362-5439** fax: (318) 362-5448 email: neroadmin@la.gov	Caldwell, East Carroll, Franklin, Jackson, Lincoln, Madison, Morehouse, Ouachita, Richland, Tensas, Union, West Carroll, Winn
Northwest Regional Office	**Parishes Served**
Regional Manager: Larry Baldwin (acting) 1525 Fairfield, Room 520 Shreveport, LA 71101-4388 **phone: (318) 676-7227** fax: (318) 676-7573 email: nwroadmin@la.gov	Bienville, Bossier, Caddo, Claiborne, De Soto, Natchitoches, Red River, Sabine, Webster
Southeast Regional Office	**Parishes Served**
Regional Manager: Brian Tusa 201 Evans Road, Building 4, Suite 420 New Orleans, LA 70123-5230 **phone: (504) 736-7701** fax: (504) 736-7702 email: seroadmin@la.gov	Jefferson, Lafourche, Orleans, Plaquemines, St. Bernard, St. John the Baptist, St. Charles, St. Tammany, Terrebonne, Washington
Southwest Regional Office	**Parishes Served**
Regional Manager: Billy Eakin 1301 Gadwall Street Lake Charles, LA 70615 **phone: (337) 491-2667** fax: (337) 491-2682 email: swroadmin@la.gov	Allen, Beauregard, Calcasieu, Cameron, Jefferson Davis, Vernon

ATTACHMENT E:
Written Notification of the Activation of Pre-Approved Emergency Debris Site

Required within five (5) days of site activation.

Mail to: Estuardo Silva, Waste Permits Administrator
Louisiana Department of Environmental Quality
Post Office Box 4313
Baton Rouge, LA 70821-4313

OR Fax to: (225) 325-8236

OR Email to: deqdebrisrequest@la.gov

_____
(DATE)

To: Estuardo Silva, Waste Permits Division Administrator

From: _____
(LOCAL GOVERNMENT, STATE AGENCY, OR PERMITTED FACILITY)

Emergency Debris Site Name: _____

Agency Interest Number: AI _____

This written notification is a follow-up to the verbal notification made to LDEQ on _____.
(DATE OF VERBAL NOTIFICATION)

The above mentioned pre-approved emergency debris site was activated for the recently declared

emergency/disaster for _____.
(NAME OF EMERGENCY/DISASTER)

_____
(NAME, TITLE, and TELEPHONE NUMBER~ PLEASE PRINT)

_____
(SIGNATURE)

Louisiana Department of Environmental Quality

Landfill and Debris Site
Oversight Branch

Revision 2

MISSION: Provide for oversight of landfills and emergency debris sites accepting and managing debris generated during emergency events.

DATE: May 24, 2017

Document Review and Revision Record

Date	Revision	Record of Activity
5/30/2013	1	Document review and revisions made to content.
5/27/2014	2	Document review and revisions made to content.
4/14/2015	2	Document reviewed with no updates.
5/1/2016	2	Reviewed with no changes.
5/24/2017	2	Reviewed with no changes.

PURPOSE

The purpose of this document is to provide clear guidance for staff performing oversight activities for landfills and emergency debris sites that accept or will accept debris generated during an emergency, as well as the approval of additional emergency debris sites that may be required during the emergency event. The timeframe covered by this document begins 2 days prior to anticipated emergency (where applicable) through the termination of the incident system.

CONTACT

Waste Permits Division Administrator at 225-219-3386 or 225-364-7901
Waste Permits Division Manager at 225-219-3043
Galvez Building Security Guard at 225-219-3384

QUALIFICATIONS

The minimum required qualifications for staff covered by this guidance are:
ICS/NIMS 100, 200, 700, and 800

Recommended qualifications for staff covered by this guidance are:
HAZWOPER Awareness Level (16-24 hours)

EQUIPMENT REQUIREMENTS

4.1 All personnel covered by this guidance shall have the following equipment available to them at all times:

Steel Toed Footwear (shoes/boots)
Eye Protection
Hearing Protection
Hard Hats
Appropriate Communication Equipment (cell phone/satellite radio/satellite phone, etc)
Vehicles
Reflective Vests

4.2 Additional equipment that may be required dependent upon emergency event:

Respiratory Protection
Hand Sanitizer
Insect Repellent
Eye Wash
Hand Protection (gloves suitable for hazards, such as heavy duty leather work gloves and/or chemical resistant gloves)

Antiseptic Cream
Adhesive Bandages
Paper Towels
Flashlights
Hats (for sun protection where hard hats are not required)
Ice
Ice Chests
Sunscreen
Mineral Replacement Drinks (Gatorade, Powerade, etc.)

The branch chief shall be responsible to insure that the need for any supply items not currently available is communicated to incident command via the Logistics section.

SAFTEY

All staff covered by this guidance shall have the appropriate qualifications outlined in Section 3.0.

All staff going into the field shall follow the Health and Safety Plan developed for the incident.

During an emergency event, oversight staff shall participate in any safety briefings provided or required by incident command. Staff shall participate in any additional safety training required by incident command.

6.0 ORGANIZATION

The organizational structure for the branch is provided as Attachment A.

The Waste Permits Division (WPD) administrator shall serve as branch chief during the initial phase of the emergency event. Dependent upon duration of the incident, the manager of the WPD may also serve in that function.

The WPD (225-364-7901) shall serve as a direct liaison between the Department of Environmental Quality (the Department) and the Department of Transportation and Development (DOTD). The WPD shall work to insure that any DOTD request is appropriately performed, as allowed, and shall communicate daily with the branch chief regarding all DOTD requests.

Oversight strike teams consisting of 2 persons each are available for field activities. Depending on duration of event, the members of the strike team may be relieved of their roles for periods of time during the event, as necessary. The replacement personnel will be named by the branch chief and may be employed normally within any division of the Department.

All other staff of the WPD not otherwise named as part of an oversight strike team shall be available during the emergency to provide for the processing of additional sites that may be requested during the incident and for the entry into electronic databases of any field activities for any strike teams that are not able to perform such activities.

7.0 PRE-EMERGENCY ACTIVITES

The WPD maintains an electronic listing of all pre-approved emergency debris sites as well as a list of all permitted landfills. Two (2) days prior to any anticipated emergency event (if prior notice is provided), the administrator of the WPD shall print a copy of the list of all pre-approved emergency debris sites and a copy of the permitted landfills list in a location accessible to LDEQ staff. If electronic access is available, the electronic lists shall be maintained and updated as needed.

8.0 STRIKE TEAM ACTIVITES

The branch chief will prepare a schedule for oversight activities for the strike teams on the day immediately after the emergency occurs. An example schedule is located in Attachment B. Sites will be added to or deleted from the schedule during the incident depending on activation of sites, approval of new sites, landfill availability, etc.

According to timelines established by the IMT, the Branch Director or designee will prepare the ICS 204 Work Assignments according to the work schedule and give to the Operations Section Chief during the Tactics/Planning meeting for incorporation into the ICS 215 Resource Assignment and the Incident Action Plan.

Based on the schedule, operating landfills and activated emergency debris sites will be visited/inspected to insure compliance with any Emergency Declaration, Administrative Order, Permit, and/or the Emergency Debris Management Plan.

These oversight inspections shall be documented using the Emergency Debris Site Assessment Checklist and/or following the Landfill Assessment Guidance. The items to be documented should be those items/issues observed by the strike team. Once the team returns to their office, electronic data entry shall be performed in accord with the “Assessment Data Entry into TEMPO During an Emergency” guidance document. If the strike team is not able to enter the information due to time constraints or other constraints, other LDEQ staff shall enter the information. All completed Emergency Debris Site Assessment Checklists shall be sent to the Department’s Electronic Document Management System (EDMS) within 2 days of completion. If the strike team member is not able to send the document to EDMS, the remaining office staff shall perform this function.

The strike teams shall also perform closure inspections for any activated sites once debris management activities are completed. An Emergency Debris Site Closeout Checklist shall be completed for all debris site closure inspections. The member who completes the checklist shall be responsible for sending the completed form to EDMS and for completing all required electronic data entry into TEMPO.

9.0 EMERGENCY DEBRIS SITES

The Department has pre-approved many sites for emergency debris management activities. Once an emergency is declared by the secretary of the Department, these pre-approved sites may be activated. Notification to the Department is required for any site activated in accordance with the approval. Deviations from the normal activation process may be allowed in any Emergency Declaration and Administrative Order signed by the Secretary. Activated sites will be added to the schedule for oversight activities outlined in Section 8.0 until deactivation of the site is completed.

Due to the nature of emergency situations, additional non-preapproved emergency debris sites may be needed and requested during an emergency. All requests for additional sites shall utilize the Emergency Debris Site (EDS) Request Form. Copies of this form may be delivered to interested parishes, municipalities, or state agencies electronically as requested and available, or by hand delivery.

When a completed form is received, the appropriate LDEQ staff shall evaluate the site for use utilizing the Emergency Debris Site Evaluation form.

Once a new site is approved for use, it will be added to the schedule for oversight activities outlined in Section 8.0 until closeout of the site is completed.

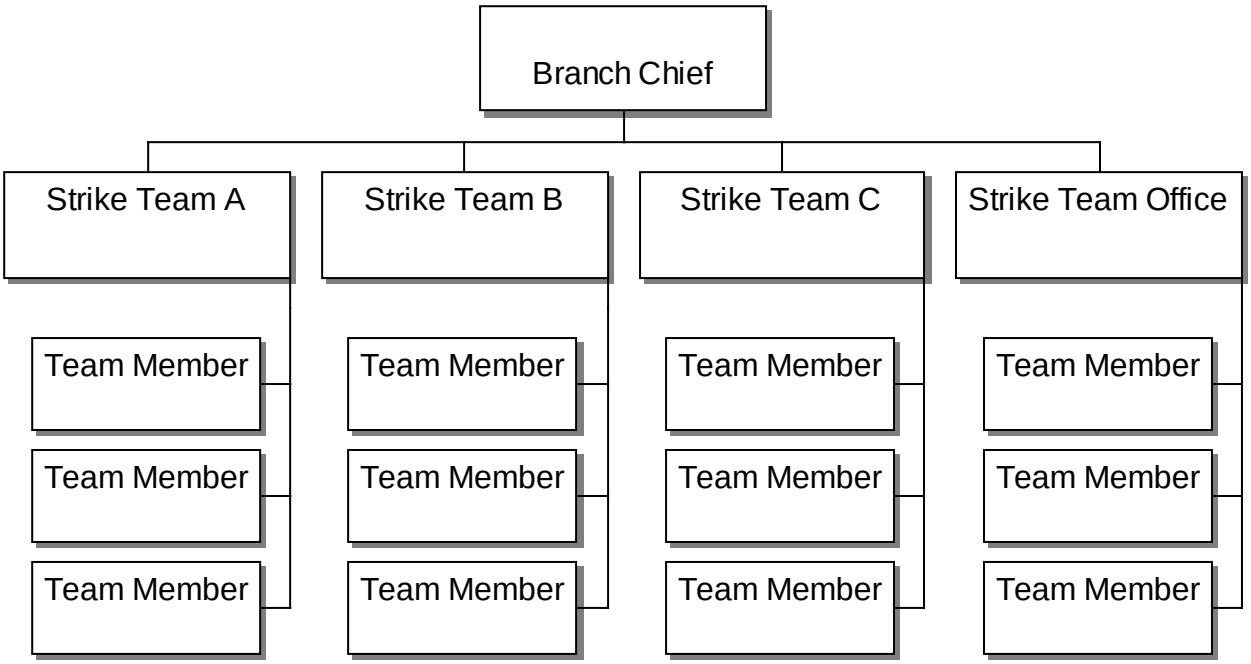
10.0 DOCUMENTATION

All personnel performing tasks related to emergency operations shall complete appropriate forms and checklists necessary to document their operations during the event. These forms may include, but are not limited to, ICS Forms 204, 214, 215, 218, and 226. Other forms may also be required by the department and shall be completed as required.

.

ATTACHMENT A

ORGANIZATIONAL STRUCTURE



ATTACHMENT B

EXAMPLE SCHEDULE

Daily Oversight Schedule

Location/Site	Team Assigned	Staff Assigned	Contact #

ATTACHMENT C

EMERGENCY DEBRIS SITE ASSESSMENT FORM

ATTACHMENT D

EMERGENCY DEBRIS SITE CLOSEOUT CHECKLIST FORM

ATTACHMENT E

EMERGENCY DEBRIS SITE REQUEST FORM

ATTACHMENT F

EMERGENCY DEBRIS SITE EVALUATION FORM