

WASTE-MANAGEMENT PLAN OPTIONAL TEMPLATE

METHODS FOR MANAGING CANNABIS WASTE GENERATED ON A PREMISES MAY INCLUDE:

- Collection and processing by a local agency, a waste-hauler franchised or contracted by a local agency, or a private waste-hauler permitted by a local agency
- On-premises composting
- Self-hauling to one or more of the following:
 - a manned and fully permitted solid-waste landfill or transformation facility
 - a manned and fully permitted composting facility or manned composting operation
 - a manned and fully permitted in-vessel digestion facility or manned in-vessel digestion operation
 - a manned and fully permitted transfer/processing facility or manned transfer/processing operation
 - a manned and fully permitted chip-and-grind operation or facility
 - a recycling center as defined in the California Code of Regulations, title 14, section 17402.5(d), and that meets all the following:
 - the cannabis waste received shall contain at least 90 percent inorganic material;
 - the inorganic portion of the cannabis waste is recycled into new, reused, or reconstituted products that meet the quality standards necessary for use in the marketplace; and
 - the organic portion of the cannabis waste shall be sent to one of the five facility or operation types listed above in the self-hauling section

WASTE MANAGEMENT STANDARD OPERATING PROCEDURES

Waste Services Provider:

ATLAS DISPOSAL

Phone Contact:

(916) 455-2800

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1. SCOPE

This waste management standard operating procedure (SOP) is to ensure That CROWN HOLDINGS GROUP LLC. (Generator) is in compliance with State, and Local waste regulations.

As a business, it is the responsibility of the Generator to ensure their environmental impact is held at a minimum.

As an employer, it is the responsibility of the Generator to protect all investors, owners, managers, employees and visitors from any exposures while at Generators site or locations.

2. PURPOSE

This SOP is to ensure the proper handling and legal disposal of all waste from Generator, all Generator facilities, personnel and activities. This program is an aide to summarize the applicable requirements of many different waste types and regulations but should not be considered all-inclusive of every waste regulation. As new regulations are promulgated, and/or other facets of waste become part of this program, updates will be made. This Program does not include the regulations for Office Trash, Food Garbage, and Common Debris since these are currently classified as solid waste. (garbage)

Trash and Garbage wastes:

- A. Will be collected and landfilled for disposal by an approved municipal waste/garbage hauler.
- B. Will be collected and hauled by Generator to an approved municipal waste/garbage transfer station and/or landfill for disposal.

All requirements of the Generator Waste Management Program will apply to the following:

- A. Cannabis Waste (Biomass Waste)
- B. Waste which consists of or contains any potentially hazardous properties.
- C. Any waste contaminated with hazardous materials
- D. Any waste or waste-like substance that is defined as an industrial waste or special waste due to its inherent properties, volume, condition, or potential harm to people or the environment.
- E. Any liquid, solid, semi-solid, or gaseous substance defined as Cannabis Waste, Non-Hazardous Waste, Non-Regulated Waste, Universal Waste, Non RCRA Hazardous Waste, and/or RCRA Hazardous Waste.

3. DEFINITIONS

Abandoned – Accumulated or stored instead of being disposed

Acutely Hazardous Waste – Those specific wastes identified in 40 CFR 261.33(e) commonly referred to as “P-Listed” (i.e. cyanides, arsenics, osmium oxide) and the “H” coded dioxin-containing wastes in 40 CFR 261.31.

Biological Waste–Infectious agents, pathological wastes, cell cultures, stocks and isolates, human or animal blood, blood contaminated material and/or sharps.

BCC – Bureau of Cannabis Control

BOL – Bill of Lading, form/document of a detailed list of a shipment of goods in the form of a receipt given by the carrier to the person consigning the goods.

Cannabis Waste – Any material, product, biomass, root, stalk, stem, leaf, flower, bud, resin, oil, and/or extraction that is derived from the cannabis plant or the cultivation /manufacturing of cannabis products that is not being used as a final product whether virgin or spent

Container – Any portable device, in which a material is stored, transported, treated, disposed of, or otherwise handled.

Discarded – Any material that is abandoned, recycled, or inherently waste-like

Disposal – The discharge, discarding, deposit, injection, dumping, spilling, leaking, or placing of any solid waste or hazardous waste on or into any land or water so that such solid waste or hazardous waste may enter the environment or be emitted into the air or discharged into any waters.

DTSC–Department of Toxic Substances Control(California EPA)

EPA – The United States Environmental Protection Agency

EPA Identification Number–Number assigned by the DTSC or EPA to each hazardous waste generator site; transporter; and treatment, storage, or disposal facility.

Food Garbage – Waste from the preparation or consumption of food products.

Generator – Any person or business whose act or process produces hazardous waste characterized or listed in 40 CFR 261.

Handling – The transportation from one place to another, loading, unloading, pumping, or packaging of waste.

Hazardous Waste – As defined in 22 CCR § 66261.101 as NON RCRA Hazardous Waste and/or in 40 CFR 261 as RCRA HAZARDOUS WASTE

Hazardous Waste Manifest – The form to accompany all shipments of hazardous waste as defined by 40 CFR 260.10.

Incompatible Waste – A hazardous waste which is unsuitable for (1) placement in a particular device or facility because it may cause corrosion or decay of containment materials or (2) commingling with another waste or material under uncontrolled conditions potentially

producing heat, pressure, fire, explosion, violent reaction, toxic dust, mist, fumes, or gases.

IUPAC - International Union of Pure and Applied Chemists, the standards body that among other things, makes recommendations regarding the names of newly discovered elements and establishes other chemistry related standards (such as the labeling of groups on the periodic table).

Laboratory – A workplace where relatively small quantities of hazardous chemicals are used on a non-production basis.

LDR – Land Disposal Restrictions, 40 CFR Part 268 Subpart B & C.

Office Trash – Waste from the normal operations in an office environment such as paper and plastics.

PPE – Proper Protective Equipment (i.e. Safety Glasses, Gloves, Respirators)

PPM – Parts per Million. Also written as mg/L (milligrams per liter)

Radioactive Waste – waste that is solid, liquid, or gas, which emits ionizing radiation spontaneously

RCRA – Resource Conservation and Recovery Act.

Satellite Accumulation Area (SAA) – A location at or near the point of generation where wastes initially accumulate under the control of the operator of the process generating the waste. Location must comply with the requirements specified under 40 CFR 262.34(c).

Secondary Containment – A container used to accumulate overflow or spillage from the primary waste container or tank. Can be a pan or

Solid Waste – Herein referred to as “Solid Waste.” As defined in 40 CFR 261.2- any garbage, refuse, trash, or material that is inherently waste-like, not currently needed, or is being stored or accumulated instead of being disposed, or any discarded material that is not excluded by 262.4(a) or that is not excluded by variance under 260.30 and 260.31. Its physical state can be solid, semi-solid, liquid, or contained gaseous material.

Special Waste – A subset of solid waste that is not hazardous waste; however, it is managed in a similar way due to potential for harm to humans or the environment or disposal concerns or restrictions. Examples include glycol solutions, ethidium bromide, etc.

TCLP – Toxicity Characteristic Leaching Procedure

Treatment – Any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any hazardous waste so as to neutralize such waste; or so as to recover energy or material resources from the waste; or so as to render such waste non-hazardous or less hazardous; safer to transport, store, or dispose of; or amenable for recover amenable for storage; or reduced in volume.

Universal Waste – As defined in 40 CFR 261.9 & 22CCR § 66273.1 (i.e., nickel-cadmium batteries, lead-acid batteries, mercury containing equipment, fluorescent lamps, Aerosol Cans).

Waste Stream – A waste material generated either one time or routinely at a single generating facility with physical characteristics and chemical composition that does not vary significantly from shipment to shipment.

4. ROLES & RESPONSIBILITIES

4.1 Generator.

Follow procedures to ensure effective compliance with the Waste Management SOP.

Consult with ATLAS prior to implementation of operation specific procedures to prevent confusion or compliance issues.

Provide ATLAS with notification prior to implementing changes that increase or reduce waste streams.

Ensure that all appropriate personnel strictly adhere to the Waste Management SOP.

Ensure that employees working with waste pertaining to this SOP attend initial training and annual refresher on the Waste Management SOP and emergency procedures.

Maintain training records for current and past employees.

Maintain all documentation required by the EPA regarding waste determinations, inspections, contingency plans, manifests, LDR, transportation, storage, and final disposal.

4.2 Generator Personnel

Understand the hazards within your common business operations, and the chemicals you work with. Always wear proper PPE. Make informed decisions based on that understanding.

Complete training on proper waste management whether written or oral.

Comply with hazardous materials procedures and protocols, whether written or oral, while performing assigned duties. Become familiar and comply with Waste Management SOP.

5. PROCEDURE

5.1 Waste

5.1.1 What is a Waste?

Waste has a very long and broad definition. If it is a waste, a waste determination must be completed to define what type of waste it is. A proper determination must be made initially as many requirements are different depending on the waste type and/or stream.

Note: Many household wastes are not subject to the regulations that apply to commercial, and industrial settings; however, regulations do apply to businesses and are enforced.

Most waste is defined by this condensed definition:

A waste is any garbage, refuse, or other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities.

Discarded material is any material that is abandoned, recycled, or inherently waste-like.

Abandoned means accumulated or stored instead of being disposed.

5.1.2 Waste Determination

Every waste must have a Written Waste Determination completed in order to properly manage the waste during disposal. This is similar to the decision one must make when disposing of simple office trash; such as, paper and plastics go into recycling and food goes

into the trash. In order to complete the written waste determination, you must be familiar with what each type of waste encompasses and the process that generated the waste. Written waste determinations must be maintained for 3 years after the last shipment of waste. At minimum the following sections should be followed to make a waste determination.

5.2 Waste Classification

5.2.1 RCRA Hazardous Waste Classification

In order to decide whether you have a RCRA Hazardous Waste, you must determine whether your waste has certain characteristics (40 CFR 261 Subpart C) or appears on one of several lists (40 CFR 261 Subpart D) found in the regulations. If your waste does not meet these criteria and is not a RCRA Hazardous Waste, please confirm it is not regulated as another type of waste.

Although some waste you generate may not be a hazardous waste, it still may be harmful or cause adverse effects to health, safety, or the environment; therefore, it may be necessary to manage it as another type of waste to minimize adverse effects or to comply with other regulations.

A waste that meets any of the definitions of Hazardous Waste. Treatment of a waste so that regulation does not apply is prohibited. It is a felony to treat hazardous waste without a Permit, and Generator_ has no Applicable Permits.

5.2.2 NON RCRA Hazardous Waste

In order to decide whether you have a NON RCRA Hazardous Waste, you must determine whether your waste has certain characteristics as defined in 22 CCR §66261.101 found in the California regulations. If your waste does not meet these criteria and is not a NON RCRA Hazardous Waste, please confirm it is not regulated as another type of waste.

5.2.3 Identification and Labeling

Containers must be clearly labeled the date upon which each period of accumulation begins must be clearly marked and visible for inspection on each accumulation unit. (22CCR 66262.34.) While being accumulated on site, each generator tank or container must be labeled or clearly marked with the words, "Hazardous Waste." (22CCR 66262.34.) Each container and portable tank in which hazardous waste is accumulated must be labeled with the following information: (a) composition and physical state of the waste; (b) statement or statements that call attention to the particular hazardous properties of the waste (e.g. flammable, reactive); and (c) name and address of the generator. (Section 66262.34.) (4) Containers and tanks used by the generator to collect or consolidate wastes initially accumulated in other containers or tanks are subject to the same labeling requirements. The initial accumulation and "90-day period" dates on the "collection" container/ tank must be the oldest of the initial accumulation and "90-day period" dates from the various containers/tanks emptied into the "collection" container/tank. This may require dates to be changed if wastes from "older" containers/tanks are added to the "collection" container/tank. When using a container which differs from the original chemical to collect waste, always obliterate the original label to avoid confusion, then relabel as hazardous waste and list the contents. Do not use chemical formulas, chemical symbols, chemical equations or abbreviations.

If the waste is not hazardous waste, do not label it as hazardous waste.

5.2.4 Generation of Hazardous Waste

- a. Container of Hazardous Waste must be labeled with the words “Hazardous Waste.”
- b. Container must be in good condition and compatible with the waste.
- c. Container must ALWAYS be CLOSED, unless actively adding waste.
- d. Container must be dated when the first drop of waste is placed inside.
- e. Container must be non-leaking and stored in a manner to prevent releases.
- f. Containers of ignitable or reactive waste must be ≥ 50 feet from property line
- g. Cannot accumulate for more than 90 days at LQG sites.
- h. Cannot accumulate more than 180 days at SQG sites.
- i. Area must be maintained in a manner to prevent fire, explosion, and spills.
- j. Area must have all emergency equipment tested and maintained.
- k. Area must meet all aisle space requirements to allow movement of personnel and emergency equipment.

5.2.5 Accumulation of Hazardous Waste

Generators of hazardous waste must accumulate the waste properly to prevent releases and avoid compliance issues.

- A. All hazardous waste must be placed into containers that are adequate to contain the material until final disposal. Examples are as follows:
 - a. The original container.
 - b. Department of Transportation Approved Container that is compatible with the waste that can be securely closed, sealed, and will not leak.
 - c. ATLAS supplied waste containers, if compatible with waste contents.
- B. Before placing hazardous waste in the container, it must be labeled with the intended contents, using IUPAC chemical names, and the words “Hazardous Waste.” This label must be on the outside of the closed collection container. If many smaller containers are inside, the outer container must be closed and labeled. Simply labeling an open container, pail, drum, or cart containing unlabeled waste(s) is a violation
- C. Fill containers to 95% capacity or less. Always leave 5% headspace for the waste to expand during transportation.
- D. Do not combine hazardous waste with any other materials or wastes. If they are combined, then the entire mixture is classified as hazardous waste.
- E. Secondary containment, especially during collection activities, is highly recommended.
- F. Certain combinations of chemicals are explosive, poisonous, or hazardous in other ways. Wastes can react in the same manner. Personnel SHALL ENSURE that different types of chemicals and wastes are segregated so that a substance cannot accidentally come into contact with an incompatible substance. Here are a few incompatible mixtures that must be avoided:

- a. Corrosives (acids) react with caustics(bases).
- b. Cyanides react with acids.
- c. Oxidizers can react violently with combustible materials (paper, common solvents) and may cause a fire.
- d. Hydrides (e.g., sodium hydride) can react with water to form flammable gas.
- e. Phosphides (e.g., sodium phosphide) can react with water to form toxic gas.
- f. Unsaturated compounds (carbonyls, double bonds, etc.) may polymerize violently in the presence of acids or bases.
- g. Hydrogen peroxide/acetic acid solutions may explode when heated.
- h. Hydrogen peroxide/sulfuric acid mixtures are susceptible to spontaneous and unpredictable chemical reaction.
- i. Water reactives, primary metals, and pyrophorics must be stored individually.

If you have any questions, Contact ATLAS (916) 455-2800 for guidance, hazard information, and/or removal.

5.2.6 Prohibited Substances in Waste Streams

All hazardous waste must be treated utilizing proven treatment technologies according to the EPA. Due to currently available treatment technologies and/or exponentially higher accumulation, transportation, and treatment costs, the following cannot be mixed with any other wastes or substances:

- A. Radioactive Materials
- B. PCB's (polychlorinated biphenyls, arochlor, chlorextol, chlorodiphenyl)
- C. Infectious Waste or Biologicals (human blood, serum, body fluids, etc.)
- E. Dioxin Waste (TCDD, pentachlorophenol, tri- and tetrachlorophenol)
- F. Asbestos
- G. Mercury and Mercury Compounds

5.2.7 Cylinders of Compressed or Liquefied Gasses

Cylinders used at Generator_ should be rented from gas suppliers if at all possible. Cylinders are never truly empty in normal use, which causes unique disposal concerns. Renting cylinders from vendors mitigates these concerns since the cylinder will be reused for its intended purpose. This also assures that all cylinders will be in good condition, meet current test standards, and can be returned to the vendor when it is no longer needed.

5.2.8 Avoiding Unknown Wastes

To prevent the accumulation of unknown chemicals, researchers, principal investigators, and personnel must:

- A. Ensure that all chemicals, mixtures, and even water are properly labeled at all times.
- B. Ensure that proper procedures are followed when closing or moving a laboratory.
- C. Dispose of old or unneeded chemicals in a timely fashion.

If unknown waste(s) are encountered, they must be labeled as "Container on Hold Pending Waste Determination" and contact ATLAS (916) 455-2800

5.2.9 Proper Disposal Process

Disposal of hazardous waste actually occurs only at permitted Treatment, Storage, and Disposal Facilities (TSDF). Generator_ has contracted ATLAS with registered transporters and specific TSDF for Generator_ generated hazardous waste. ATLAS ensures proper

determination, documentation, packaging, labeling, and waste coding takes place for all shipments. In order for this process to be completed, generators of hazardous waste must follow the below procedure to have waste removed from their area.

- A. To dispose of hazardous waste or unwanted chemicals, please contact ATLAS (916) 455-2800
- B. Upon receiving the request, ATLAS will pick up the chemical waste. Generally, pickups are conducted within 1 week.
- C. Unknown and/or unlabeled chemicals may not be accepted for disposal, without additional information.
- D. Chemicals and containers must be compatible and labeled with the common name of each chemical (See Identification and Labeling).
- E. Chemical containers should be no more than 95% full to allow for expansion and must have a screw cap closure or equivalent. Container must always be securely closed to prevent any leaks during handling.
- F. All Hazardous Waste will be Transported to State or Federally approved TSDF .

5.2.10 Recordkeeping

All records of manifests, LDRs, contracts, notifications, chemical waste disposal request forms, inspection logs, and other pertinent documentation pertaining to Hazardous Waste must be maintained for 3 years.

5.3 Universal Waste

5.3.1 Determining Universal Waste Classification

Universal wastes include:

- A. Batteries
- B. Some agricultural pesticides
- C. Thermostats, Thermometers, and sealed mercury-containing devices
- D. Fluorescent Lamps and other mercury-containing lamps
- E. Aerosol Cans/Canisters

5.3.2 Accumulation of Universal Waste

Disposal of universal waste by the Generator is prohibited. Universal Waste is a subset of Hazardous Waste; therefore, if the following requirements are not met, the waste will be classified as hazardous waste and subject to those more extensive regulations.

Requirements are as follows to be Universal Waste:

- A. All items must be intact (not broken, leaking, or crushed).
- B. All items must be labeled (see Identification and Labeling).
- C. All items must be dated upon the start of accumulation.
- D. All items must be accumulated in a manner to prevent breakage (as if it was New)
- E. All items must be shipped to recycling facility less than 1 year from start of accumulation
- F. Universal Waste Pesticides must have original contents label intact.

5.3.3 Identification and Labeling

A. Label Wording:

The regulations are very specific. The following label requirements must match those specified in the regulations. Do not write "Hazardous Waste" or use a hazardous waste label on these types of waste unless they are broken or leaking.

B. Batteries:

Each battery or the container in which waste batteries are placed in must be clearly marked as “Universal Waste - Used Batteries” and must be dated. No other wording or synonyms can be used. In addition, all terminals must be Taped or Covered securely to prevent short circuits.

C. Pesticides:

The pesticides included under the universal waste rule include recalled or unused stocks of pesticides as part of a waste pesticide collection program. Each pesticide must be clearly marked as “Universal Waste - Pesticide” and dated. No other wording or synonyms can be used. In addition, the original contents label must be present and intact. The container of pesticides must be closed, or placed inside another closed container.

D. Thermostats, Thermometers, and Sealed Mercury containing equipment:

The Mercury-containing equipment included under the universal waste rule includes Thermometers, Thermostats, Manometers, and other equipment containing elemental mercury. All items must be placed into a sturdy, sealed container. Each Container of equipment must be clearly marked as “Universal Waste - Used Mercury-Containing Equipment” and dated when the first item is placed inside. No other wording or synonyms can be used. All Containers must be kept closed to prevent releases.

Leaking or damaged mercury containing equipment does not qualify as Universal Waste, and must be managed as Hazardous Waste. Leaking or damaged mercury containing equipment must be cleaned up immediately, placed into a leak-proof container, closed, and labeled as “Hazardous Waste Containing: Mercury”. This would include elemental mercury in jars, broken thermometers, etc. If assistance is needed with a spill or release of mercury, please contact ATLAS immediately.

E. Fluorescent and other Mercury Containing Lamps:

The Lamps included under the universal waste rule include Fluorescent tubes, U- Shaped tubes, Compact fluorescent lamps (CFLs), High Intensity Discharge (HID), and other lamps containing Mercury (Hg). All items must be placed into a sturdy, sealed container. Each Container of lamp(s) must be clearly marked as “Universal Waste - Used Lamps” and dated when first lamp is placed inside. No other wording or synonyms can be used. Containers, usually lamp boxes, must be closed and any openings shall be covered with tape to prevent releases. Broken lamps do not qualify as Universal Waste, and must be managed as Hazardous Waste. Broken Lamps must be cleaned up immediately, placed into a structurally sound container, closed, and labeled as “Hazardous Waste Containing: Broken Lamp(s)”.

F. Aerosol cans

Aerosol cans are considered a Universal Waste in California, and must be managed before disposal. The cans are considered Universal waste when they will no longer be used, cannot be used, or when they are empty. The process to dispose of aerosol cans is as follows:

1. Remove cap and spray nozzle from canister.

2. Place Aerosol can/canister into approved container for transportation
3. Label “Universal Waste – Aerosol Cans”, Date, Generator Address.

5.3.4 Proper Recycling Procedures for Universal Waste

- A. To properly recycle Universal Waste, contact Atlas Disposal (916) 455-2800
- B. Upon receiving the request form, ATLAS will schedule a pickup of the waste.
- C. Containers must be compatible and labeled with the required information above (See Identification and Labeling). Incorrectly labeled containers may not be accepted for recycling, without additional information.
- D. Container must always be securely closed to prevent any releases during handling.
- E. If above conditions are not met or additional hazards exist, some waste may not be picked up until corrected.
- F. All Universal Waste will be Transported to State or Federally approved TSDF

5.4 Cannabis Waste

5.4.1 Cannabis Waste

Roots, stalks, stems, leaves, flowers, buds from the cannabis plant or the cultivation /manufacturing of cannabis products that is not being used as a final product whether virgin or spent, shall be rendered unusable and unrecognizable.

5.4.2 Accumulation of Cannabis Waste

Cannabis Waste must be placed into a secure and sealable container and labeled as described below. Containers will be provided by ATLAS

5.4.3 Identification and Labeling

Cannabis Waste must be labeled as “Bio-Mass” and dated **Do Not Label as “Waste” or “Hazardous Waste”** If hazardous materials have been added to the Cannabis waste, the waste could be classified as hazardous waste and subject to those more extensive regulations. ATLAS will provide all waste labels

5.4.4 Proper Disposal Process for Cannabis Waste

- A. To dispose of Cannabis Waste contact Atlas Disposal (916) 455-2800
- B. Upon receiving the request form, ATLAS will schedule a pickup of the Cannabis Waste.
- C. Incorrectly labeled containers may not be accepted for disposal, without additional information.
- D. Container must always be securely closed to prevent any liability during handling.
- E. During pickup, containers may not be removed if above conditions are not met or additional hazards exist.
- F. All Cannabis Waste will be transported off site to be converted into Bio-Mass Fuel.
- G. Once processed and blended the Bio-Mass fuel is then transported to a state approved Bio-mass fuel generator facility where it is used to produce electricity.

5.5 Waste from Spills and Releases

Spills of hazardous materials must be cleaned up immediately. In most cases, the waste from a spill must be managed as if it were waste of the original material. Consult Safety Data Sheet (SDS) if spill is from a manufactured product for guidance. Toxicity should always be considered. At minimum, contain the spill from spreading further and control access to the area, if safe to do so. Smaller spills can usually be absorbed with materials in a spill kit. Larger spills may require pumping into containers or additional resources. If you cannot clean up the spill

safely and effectively, **contact ATLAS immediately for assistance at (916) 455-2800.**

Spill kits are available from ATLAS for individual areas if a chemical inventory is provided. These kits contain absorbents, labels, and various other tools to assist with cleanup of spills. A spill kit is not required to cleanup spills, but usually make the process simpler.

All contaminated materials and absorbents must be placed into a leak proof container, kept closed, and labeled as appropriate for the waste type. Spill kits are available from ATLAS

Examples:

If a few liters of oil is spilled, attempt to stop the source of the spill. Then, stop the oil from entering any drains, cracks, or crevices. Contact ATLAS. If available, use the contents of a spill kit to absorb the oil. Place the soaked absorbents into a leak proof container (like the original spill kit). Label the container as “Used Spill Kit. Contains Waste: Used Oil and Debris”.

If hydrochloric acid is spilled, attempt to stop the source of the spill. Then, stop the acid from entering any drains, cracks, or crevices. Contact ATLAS. If no spill kit is available, absorb the acid with other materials that may be available. Place the soaked absorbents into a leak proof container. Label the container as “Hazardous Waste containing Hydrochloric Acid and Absorbents”. Universal Waste