



City and Borough of Wrangell
Port Commission
AGENDA

Monday, October 10, 2022
6:00 PM

Location: Borough Assembly Chambers
City Hall

WORK SESSION

Date and Time

- 1. CALL TO ORDER**
- 2. ROLL CALL**
- 3. APPROVAL OF MINUTES** (*MOTION - Move to approve the Minutes, as presented*)
 - a. Port Commission Meeting Minutes 09/1/22
- 4. AMENDMENTS TO THE AGENDA**
- 5. CORRESPONDENCE**
- 6. PERSONS TO BE HEARD**
- 7. HARBORMASTER'S REPORT**
 - a. Harbormasters Report September 2022
- 8. COMMISSIONER REPORTS**
- 9. UNFINISHED BUSINESS**
 - a. Channel Construction LLC request for lease property 6-mile mill site
- 10. NEW BUSINESS**
- 11. NEXT AGENDA ITEMS**
- 12. ADJOURN**

Minutes of the Regular Wrangell Port Commission Meeting

Held September 1, 2022

Vice Chairman John Yeager called the Regular Port Commission meeting to order at 6:03p.m. June 2nd, 2022, via Borough Assembly Chambers

PRESENT: Yeager, Buness, Roppel, Morrison

ABSENT: Martin

Harbormaster Steve Miller was also in attendance.

APPROVAL OF MINUTES

- a. Approval minutes from meeting June 2nd, 2022

M/S: Buness/Morrison to approve the minutes, as presented. Motion approved unanimously.

AMENDMENTS TO THE AGENDA

CORRESPONDENCE/PERSONS TO BE HEARD –

HARBORMASTER'S REPORT

The summer season is almost to a close as traffic and services have slowed down which is normal for this time of year. There have been two new hires to the harbor as Jacob Allen has been added to new security and Andrew Eyon as Temp. Administrative Assistant. Steve Miller Stated he has been looking into the security System that Sitka and the Wrangell Ferry Terminal have been using. It is wireless, directional, 4 plex, pan zoom, with quality pictures with months of recording, that include cloud-based storage.

Cruise Ship Season is Almost over and next year is looking even better than this year, Passenger Warf counts coming soon. MSC. Has also slowed down 2-4 ships a week. New netfloat at shoemaker is great, almost all harbor lines are painted. New railing at reliance and the railing around the crane needs replaced, estimated shut down a week to replace. Buness asked of "Chains" refer to packet photo- Morrison asked about Johnson's work at Heritage, Miller response the project is accepted with promise to repair the issues(ie,drain)

COMMISSIONER REPORTS

Morrison- Nothing to add. Roppel mentions other communities port development, tying into potential Mill lot usage. 6:20 Martin joined, impressed by Hoonah's Cruise Ship facility and tying in potential Mill lot usage for expansion. Yeager adds that bigger ships in communities push small ships out and that is something to keep an eye on. Buness has nothing to add. Yeager has nothing more to add except a good job to the harbor crew.

UNFINISHED BUSINESS-

NEW BUSINESS –

10a Channel Construction Inc. Request to lease six acres of City & Borough of Wrangell Property Shown on Exhibit A 6-mile Mill property.

M/S: Morrison/Buness motion moves to Recommend. Motion approved to discuss.

Roppel thinks we should explore more application uses for land and who might want to develop. Buness wants to know the city wants in its entirety for the property and if deals with the waste stream, that she is open to the possibilities. Morrison wants to know what the options on the lease are, and options for the rest of the property. Buness wants to know the demand changes on scrap metal and how it could fluctuate. Yeager adds that they are in an agreement that a more detailed business plan is needed and interested in city managers input or ideas. Also curious about lease details. Roppel believes this land is meant for community development. Martin Interested in other projects for property. Motion to recommend to approve denied unanimously on the grounds they require more detailed information. Morrison suggests comparing short- and long-term leases to potentially compromise

NEXT AGENDA ITEMS –

The next Regular meeting October, 6th 2022

Regular meeting adjourned at 6:50pm

Harbormasters Report

September 2022

Harbors: Jacob Allen has taken a position at the land fill and Chris Smith is making his way south to start a new career. So, we have 2 open positions at the Harbor to fill. These positions may take some time to fill as the labor pool in Wrangell is slim. We will be filling the gaps the best we can. There no longer will be any night shift until we get these positions filled. We will alternate who is on standby for emergencies and do the best we can to service our customers. This also slows down maintenance as he will be doing inventory 3 of the 5 days of his work week.

We will be working on getting all floats winterized and ready for winter. Pressure washing will continue until it gets too cold. Notices to remove items from the floats for snow removal will be going out as well.

Ports: We finished up the cruise ship season with the final ship on September 25th. The summer floats have been cleaned and stowed for the winter. Waterlines on city dock have been winterized for the season.

I can also report on the passenger wharfage fee that was implemented July 1st. The count for passengers July 1st thru October 1st is 9,494 with revenues of \$41,200. This will help balance our budget for port operations and losses we suffered the last few years. This is approximately half of what we project for a full year of operations.

Carol Rushmore and I conducted an end of Cruise Ship season meeting with tourism industry participants. It was productive and very positive which was nice to see. I have included it as an attachment to the harbor report.

Marine Service Center: The Winter storage rush is just about wrapped up. They continue to trickle in, and all long-term storage is at about 90% + capacity and work areas are about the same. The yard will continue to run at capacity throughout the winter. Scheduling has been such that we have recommended boat owners to book in advance as many months as possible.

Wrangell Ports and Harbors

907-874-3736 <https://www.wrangell.com/port/welcome-port-and-harbors>

**150-ton & 300-ton Boat Lifts,
& a Wide Range of Boat Repairs**

New Back Drop for Marine Expo

Ports and Harbors Maintenance September 2022

The crew has done a great job this month.

- Pressure washing continues at Heritage Harbor
- Light bulbs replaced at all harbors including gangways
- Pulled all summer floats scraped, pressure washed and re-zincd, stored for the winter
- Winterized city dock water lines
- Camel logs at city dock removed and stored.
- Shoemaker Bay Crane serviced
- Emergency pumps serviced all harbors
- Heritage Harbor Parking lot lights fixed

Heritage Harbor Parking Lot Lights Wiring



Summer Float cleaning.



Cruise Ship Season End Discussion September 28, 2022

Attendees:

Steve Miller, Carol Rushmore, Jeff Good
James Leslie; Daniel Powell
Zak Taylor
Ceona Koch; Kimberly Ottesen
Shelly Powers
Caitlyn Cardinelle
Greg and Carrie McCormack

Bathrooms for next year. Do not want this to be forgotten. Reports of individuals peeing in yards up on the hill. Noted that it could still likely happen because if they are up there, they won't be near the new bathrooms either.

Parking at the Museum. Museum needs to make sure the cones are out on cruise ship days to prevent parking in front of the facility.

Cruise Calendar: Prefer the listing format vs. calendar format. Identify what ships are at anchor. Noted that anchorage could be changed by ship/CLA without our knowledge as occurred a few times this year.

Improvements to Petroglyph Beach platform – pedestals for the copies, non-skid surfacing, supports of the structure, board rotten

Talk to State Parks and Rec regarding adjacent property for future turnaround access for busses. Sandy Beach layout/design in Petersburg is excellent sample of what the area could look like.

Port staff and the port hired Ship security provided great service and assistance

Cul-de-sac used to be blocked off at the entrance. Can that occur again. Signage for no parking on cruise ship days helped a lot, but still a lot of traffic moving through cul-de-sac. Coordinate schedule with barge companies to utilize other entrance on ship days (for smaller vehicles). Long Shoremen are still parking where the busses need to stage.

North dock of summer floats needs to be pressure washed.

North ramp had rotten wood that needed replacing.

Comments from passengers that the entrance to cul-de-sac from ships is not very welcoming.

Possibly a table with covered area to provide maps and greet passengers when they first get off ship (not all day, but part of morning)

Alaska Dream Cruises had super stinky garbage hauling from ship across dock. Finally started using the hoist in the harbor. Can this be standard operations?

Comments:

Historic plaques on buildings. How were those selected and placed? Probably part of a 1986 historic building survey and inventory for the Wrangell Historical Society to identify a Historic District. Owners currently can have their building considered for the National Register of Historic Places should they choose to. State Historic Preservation Office would provide guidance on requirements. A historic district could be pursued by the City and Borough of Wrangell but the implications pros/cons should be identified and discussed thoroughly. There is a specific process required. A potential Historic district was also identified during the Downtown Revitalization process which helped guide construction monitoring requirements.

Noordam (larger ship) came due to need for a condensed itinerary and closure of another port.

There will be 50% more ships next year than this year. Trend for increased ship calls.

Expedition style ships likely would not come to Wrangell if the larger ships come more frequently.

Focusing on type of ships the currently call appears to be a good fit for community.

Ships pay a set amount per foot to tie to the dock. They pay a wharfage fee based on # pax. They pay for garbage disposal, security, water. Also pay a lightering fee (60% of cost to tie to dock)

Summer floats will be removed the week of September 15th. They are usually put into place a week or two before the first ship arrives.

Concerned that the Tourism industry has no speaker or is not highlighted at the Chamber economic forums on Friday.

Consensus of attendees felt like pursuing the TBMP was a good idea. Proactive with community.

Suggestion to either identify various jetboats or make sure someone provides defining boat descriptions so that the wrong company isn't blamed for a potential issue.

CITY & BOROUGH OF WRANGELL, ALASKA PORT COMMISSION AGENDA STATEMENT

<u>AGENDA ITEM TITLE:</u>	<u>DATE:</u>	October 10th, 2022
	<u>Agenda Section</u>	9

Channel Construction Inc. request to lease approximately 2 acres of City & Borough of Wrangell Property Shown on Exhibit A 6-mile mill property. Lot 6 and 7 USS 3534, zoned Waterfront Development, owned by the City and Borough of Wrangell (Short Term Lease 3 months.)

SUBMITTED BY:

Steve Miller, Port & Harbor Director

FISCAL NOTE:

Expenditure Required: \$0Total

FY 20: \$	FY 21: \$	FY22:
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Amount Budgeted:

	FY22 \$0
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Account Number(s):

Account Name(s):

Unencumbered Balance(s) (prior to expenditure)

Reviews/Approvals/Recommendations

<input checked="" type="checkbox"/>	Commission, Board or Committee
Name(s)	
Name(s)	
<input type="checkbox"/>	Attorney
<input type="checkbox"/>	Insurance

ATTACHMENTS: 1. Exhibit A Property Description 2. Exhibit B P&Z Information/Recommandation 3. Exhibit C Letters from Channel Construction

RECOMMENDATION MOTION:

Move to Recommend Approval of Channel Construction Inc. request to lease 2 acres of City & Borough of Wrangell Property Shown on Exhibit A 6-mile mill property.

SUMMARY STATEMENT:

Channel Construction has requested to lease a parcel of property located at the old 6-mile mill property. The use of this property will be to maintain a recycling business in Wrangell that will

provide Jobs and a needed service for the community of Wrangell. Channel Construction will need waterfront development property to provide this service. For this business to be successful they will have to be able to bring scrap in from other communities and develop the property to fit their needs.

The City of Wrangell is now asking the port commission to approve a short-term lease "3 months" to let Channel construction continue to operate. The Lease size has also been modified to 2 acres rather than the 6 acres previously requested. The city will be working on a strategic plan for the Mill Site over the next few months and will provide a plan to use for future development.

Currently, the ports and Harbors Department does not have a conflict with this lease request.

City and Borough of Wrangell, Alaska

Date: September 6, 2022

To: Planning and Zoning Commission

From: Carol Rushmore, Economic Development Director

Re: Channel construction request to lease a portion of the former 6 Mile site near the barge landing area on the southern end of the property for scrap metal recycling, portions of Lot 6 and 7 USS 3534, zoned Waterfront Development, requested by Channel Construction Inc., owned by the City and Borough of Wrangell

REQUEST:

Channel Construction Inc. is requesting to lease a portion of the former mill site surrounding the barge landing area on the southern end of the property. Their written request asks for approximately 6 acres, but the map shows an area of approximately 3 acres.

The purpose of the lease would be to continue to utilize the area for scrap metal recycling. Their preference would be to enter into a long term lease with the City to develop on-shore support services and additional fill for the business. They are at minimum requesting a short term lease or rental to be able to continue the scrap services currently provided to Wrangell and the region.

The Planning and Zoning Commission and the Port Commission have been asked to review their request as a recommendation to the Assembly.

FINDINGS:

Ballot proposition: The City and Borough has put on the ballot a proposition to authorize the Assembly to lease or sell the former deep water industrial site property at 6-mile Zimovia. Per WMC 5.10.035(A), property valued at over \$1 million requires voter approval for selling or leasing. The CBW has had conversations with several interested parties regarding the purchase of the entire site, however nothing in writing as a letter of interest or formal proposal has been submitted so there may or may not be serious interest. Potential uses vary and may or may not be compatible with Channel construction's proposed use. However, these initial conversations prompted the Borough to start the required process for potential sale by placing the question on the ballot.

Zoning/Land Use: The property is zoned Waterfront Development. The property has historically been utilized as an industrial site with a mill at the site since at least the 1970s. The site is one of the last existing deep water industrial sites available for development options in southeast Alaska.

Prior to purchase of the site by the Borough, Mrs. Buhler was going through a subdivision process of the property. A preliminary plat had been approved by the Planning and Zoning Commission and utilities/road construction were being designed.

Should the Borough subdivide the property for multiple development opportunities, there will be a lot of work to do should the previous subdivision not be the desired layout. Per the Wrangell Municipal Code, a subdivider is responsible for utilities. The site is just beyond sewer and water. Electricity is no longer provided through-out the site. The surface of the property is mixed, and in varying conditions. The bulkhead of the property is failing. Determining potential use of the site will require considerable public discussion to determine development options. Staff is exploring funding opportunities with various agencies for planning and construction grants.

Lease/rental issues: In 2014, Department of Environmental Conservation (DEC) signed off with Silver Bay Logging on an environmental clean-up acceptance of the site. Since that time, Channel Construction has utilized a portion of the south end of the site through an agreement with Mrs. Buhler and subsequently a short-term agreement with the Borough. Activities are limited in order to minimize any potential environmental issues that could be created.

When the Borough purchased the mill in June 2022, the Borough entered into a Prospective Purchaser's Agreement with DEC. The Borough is required to do a Phase I environmental analysis. A simplified description of the outcome is that the Borough will be released of environmental liability of any existing contamination so that Borough can develop the site for economic purposes. DEC has indicated that the Borough could enter into an agreement with Channel or other parties if no environmental issues are created.

The Borough has been working with Channel Construction Inc on bonding requirements for continued short term use, identifying acceptable activities, terms of potential agreements and other requirements. The Borough has no proposed use for the site immediately and has discussed short term (annual rental) with Channel in the short term to potentially allow them to continue operations as the Borough sorts out development opportunities.

site such that we could transfer liability responsibility of future discoveries during redevelopment to DEC. The borough manager has reached out to DEC to determine what types of land uses the Borough could move forward with prior to the Phase I environmental work is completed. Their response was any activity that will not create an environmental issue.

MEMORANDUM

**TO: HONORABLE MAYOR AND MEMBERS OF THE ASSEMBLY
CITY AND BOROUGH OF WRANGELL**

**FROM: MS. CAROL RUSHMORE
ECONOMIC DEVELOPMENT DIRECTOR**

**SUBJECT: Channel construction request to lease a portion of the former 6 Mile site near
the barge landing area on the southern end of the property for scrap metal
recycling, portions of Lot 6 and 7 USS 3534, zoned Waterfront Development,
requested by Channel Construction Inc., owned by the City and Borough of
Wrangell**

DATE: SEPTEMBER 12, 2022

BACKGROUND:

The Planning and Zoning Commission at their regular meeting of September 8, 2022, reviewed the request from Channel Construction for a lease for approximately 3 to 6 acres of the former mill site surrounding the barge landing area on the southern shoreline of the property. The purpose of the lease would be to continue to utilize the area for scrap metal recycling. Their written request asks for approximately 6 acres, but the map shows an area of approximately 3 acres.

RECOMMENDATION:

The Commission voted to recommend to the Assembly to move forward with a short-term lease with Channel Construction

They believe the service he provides is invaluable to the community and to the region and until final development plans are identified by the Borough or until the Ballot issue is resolved, the Commission supports a lease agreement.

FINDINGS:

Zoning/Land Use: The property is zoned Waterfront Development. The property has historically been utilized as an industrial site with a mill at the site since at least the 1970s. The site is one of the last existing deep water industrial sites available for development options in southeast Alaska.

Prior to purchase of the site by the Borough, Mrs. Buhler was going through a subdivision process of the property. A preliminary plat had been approved by the Planning and Zoning Commission and utilities/road construction were being designed, but final approval was never received.

Should the Borough subdivide the property for multiple development opportunities, there will be a lot of work to do should the previous subdivision not be the desired layout. Per the Wrangell Municipal Code, a subdivider is responsible for access and utilities. The site is just beyond sewer and water. Electricity is no longer provided through-out the site. The surface of the property is mixed, and in varying conditions. The bulkhead of the property is failing. Determining potential use of the site may require considerable public discussion to determine development options. Staff is exploring funding opportunities with various agencies for planning and construction grants.

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William Tonsgard Jr.
Channel Construction
P.O. Box 33359
Juneau, AK 99803

September 8, 2022

City of Wrangell
P.O. Box 531
Wrangell, AK 99929

To whom it may concern:

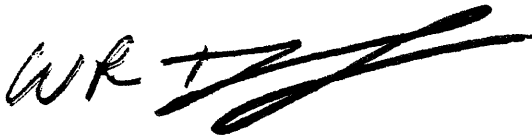
We have three barges to cut up for recycling. One is a gravel barge that has nothing on it, in the manner of machinery. The other two are camp barges, which the camps have already been removed and disposed of. There is very little paint on any of these, because of their age and lack of maintenance.

Below is size reference:

- Gravel Barge: 285'x45'x18'
- Camp Barge 1: 110'x40'x10'
- Camp Barge 2: 140'x50'x12'

I verify that these barges do not contain lead paint, asbestos, fuel, etc. that could contaminate the site.

Sincerely,

A handwritten signature in black ink, appearing to read 'WR Tonsgard Jr.', with a stylized flourish extending from the end.

William Tonsgard Jr.
Channel Construction

Schnitzer Steel - Pacific NW Region - Environmental Operations Policy & Procedures

PROCEDURE TITLE

Lead Based Paint Coated Scrap (LBPCS)

POLICY #

MRB-ENV-PNW-501

Revision: September 8, 2022

FUNCTIONAL AREA

Facility Ferrous Operations

RESPONSIBILITY

Facility General Manager/Operations Manager/Regional Environmental Manager/Regional Health and Safety Manager

PURPOSE

To establish guidelines for proper receiving, handling, and processing of lead-based paint coated scrap (LBPCS) at Schnitzer Steel Industries, Inc. facilities.

REFERENCE

MRB 8105 – Personal Protective Equipment
Washington Dangerous Waste Regulations (WAC 173-303)
Code of Federal Regulations (40 CFR part 745)
Washington Labor and Industries Regulations (WAC 296-62, 296-155)

Procedure for Handling Scrap with Lead Based Paint

1.0 Purpose & Objective

- i. Lead-based paint coated scrap (LBPCS) is a valuable source of scrap metal when it becomes obsolete. However, LBPCS contains materials that can cause health or environmental concerns if it is not properly managed during demolition, handling, transportation and recycling.
- ii. Washington Labor and Industries Regulations requires that LBPCS be properly managed. The details of the lead handling requirements law can be found in Washington Labor and Industries Regulations (WAC 296-155)
- iii. Washington Department of Ecology Regulations require that any waste materials containing lead at 5 ppm or greater be properly managed as Dangerous Waste. Washington Department of Ecology Regulations can be found in WAC 173-303.
- iv. This document outlines the responsibilities for the administration & implementation of LBPCS handling activities at Schnitzer Steel Industries facilities in accordance with the requirements of Washington Labor and Industries and Department of Ecology Regulations.

2.0 Requirements

- i. Washington facilities may accept, handle and process LBPCS, provided that appropriate precautions are implemented and that activities associated with LBPCS handling are properly documented.

- ii. If all chipping, flaking or otherwise loose paint is removed prior to transporting the LBPCS to a Schnitzer facility, and proper documentation is provided, LBPCS can be processed as scrap metal.

3.0 Receiving Lead-Based Paint Coated Scrap (LBPCS)

- i. All chipping, flaking or otherwise loose paint shall be removed at the point of origin prior to loading LBPCS for transportation to a MRB facility. Containment, labeling and disposal of material removed at the point of origin shall be the responsibility of the scrap supplier or its designee (scrap owner or contractor).
- ii. Schnitzer facilities that accept LBPCS must contain the receiving area using concrete barriers (i.e. K-rails, ecology blocks or other means to ensure full capture of paint chips which could potentially be dislodged from the scrap metal during transport and/or handling).
- iii. All LBPCS must be unloaded on a paved and impervious surface.
- iv. If an Schnitzer facility accepts LBPCS, but transfers it to another Schnitzer facility to be processed, the original accepting Schnitzer facility must maintain appropriate shipping documents to ensure all shipments reach their intended destination.
- v. LBPCS shipment documentation must contain the following:
 - a. The amount and types of LBPCS must be documented on a log and/or a weight ticket.
 - b. The amount by volume or weight of each material that was transported (weight ticket, shipping manifest or bill of lading).
 - c. Name and address of both shipping and receiving Schnitzer facilities.
 - d. Signature of shipping and receiving facility representatives.
- vi. All hazardous waste manifests for lead waste materials (dislodged paint chips) must be maintained in a readily available condition as evidence of proper handling and disposal for a minimum of three years.

4.0 Handling/Processing of Lead-Based Paint Coated Scrap (LBPCS)

- i. LBPCS that is designated to be recycled must be staged and processed on paved, impervious and contained surfaces (surrounded with K-rails, ecology blocks or permanent curbing) to prevent contamination of underlying soils or surrounding areas.
- ii. Staging and processing areas for LBPCS must have access to water service for potential use in dust control.
- iii. Processing of LBPCS should be completed during dry weather whenever possible.
- iv. Debris & paint chips must be collected from staging and processing areas at the end of LBPCS staging/processing operations, or each work shift, whichever comes first.

- v. Debris & paint chips associated with LBPCS handling or processing operations must be collected and stored in 55 gallon drums or other covered containers, labeled as hazardous waste, and placed in the hazardous waste storage area.
- vi. LBPCS waste will be managed and disposed of in accordance with Schnitzer's hazardous waste management procedures.

5.0 Health & Safety

- i. All LBPCS processing safety incidents will be reported to the SSI Regional Safety Professional immediately. An investigation and root-cause analysis will be conducted to determine adequacy of safety practices and procedures.
- ii. Personal Protective Equipment (PPE) will be provided to all staff engaging in this activity. PPE will consist of steel toed boots, gloves, high visibility uniform/vest, and respirator.
- iii. Refer to Schnitzer Steel's lead exposure control program for more information.

6.0 Record Keeping

- i. All records LBPCS records generated by the facility must be retained for three years.
- ii. Duplicate copies of records will be maintained by the Facility General Manager in on-site facility files and the Regional Environmental Manager in central environmental files.
- iii. Records shall be easily retrievable such that they can be made available for inspection upon the request of a governmental inspector.
- iv. The records shall include:
 - a. All transfer bills of lading for LBPCS transferred to and/or between Schnitzer facilities.
 - b. All shipping manifests or bills of lading that accompany shipments of any waste materials removed from LBPCS.
 - c. All equipment and employee certifications.
 - d. Training records must document trainer/trainee information, dates, any scores, and material covered.

7.0 Responsibilities

- i. Regional Environmental Manager (REM)
 - a. Obtain all required local, state and federal hazardous waste generator approvals - if/when required.
 - b. Develop, implement, and administer Schnitzer Steel Inc. LBPCS policy/procedures.
 - c. Conduct and provide regional and/or site specific training to managers/supervisors/employees.
 - d. Conduct periodic inspection of the program, work areas, waste storage areas and facility files to ensure uniform implementation and to meet Federal, State, Local and company requirements.
 - e. Coordinate disposal of lead-based paint containing debris.
 - f. File required regulatory reports detailing disposal of hazardous wastes.

- ii. Employees
 - a. Attend training on the receiving, handling, and processing of LBPCS.
 - b. Properly clean work areas and implement containment /labeling requirements for lead based paint containing debris (paint chips).

8.0 Training

- i. Supervisors and Managers will receive all necessary training related to lead and lead based paint through Schnitzers online learning management system: Cornerstone. This will assist the performance of assigned tasks in accordance to federal, state, and company requirements (this policy). Training shall encompass how to identify, handle, manage and process LBPCS.
- ii. Supervisors and Managers shall ensure that employees receive the appropriate training on environmental, health and safety compliance and/or department or job-specific training with respect to their job assignment(s). All training and related documents shall be available on-site and/or available through Cornerstone.
- iii. All training sessions shall be documented and such documents shall be stored in accordance with record keeping requirements. A minimum of annual training is required for this program. New staff shall be trained within the first week of employment or prior to conducting any handling or processing of LBPCS.

9.0 Quality Control

- i. The REM shall conduct periodic inspections and document audits of this program to ensure program effectiveness and that requirements of the program are being implemented.

10.0 Approved Vendors

- i. All hazardous waste related materials (lead-based paint chips) will be picked up and/or serviced by the following approved vendor.

Clean Harbors
26328 79th Ave S
Kent, WA 98032
253-639-4240

- ii. Pick up of Hazardous Waste shall be scheduled within 180 days of the start of accumulation and/or once capacity of the storage unit has been reached; whichever comes first.