

## Eckoff, Michael

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**From:** Troy,Randy D <rtroy@triumvirate.com>  
**Sent:** Wednesday, September 13, 2023 4:02 PM  
**To:** Eckoff, Michael  
**Subject:** Waste Minimization  
**Attachments:** TEI Waste Minimization Plan.docx

### EXTERNAL MESSAGE

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Michael,

Upon reading some of the notes from yesterday's inspection I saw the request for our Waste Minimization Plan. Please see the attached document.

V/r

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**RECORD OF REVIEW AND CHANGES**

<b>DATE</b>	<b>REVIEWED BY</b>	<b>CHANGES</b>
25 March 2021	R. Troy	<b>None</b>
11 April 2022	R. Troy	<b>None</b>
06 April 2022	R. Troy	Spelling corrections
29 August 2023	R. Troy	<b>None</b>

## Hazardous Waste Minimization Plan

### 1. Introduction

Triumvirate Environmental Services, Inc. Hazardous Waste Minimization Program is to be implemented with the goal of reducing the amount of toxicity of waste generated through its operations. Triumvirate Environmental Services, Inc. remains committed to hazardous waste minimization with the understanding that minimization is necessary in order to help decrease present and future threats to human health and the environment.

In addition, Triumvirate Environmental recognizes the existence of potential added benefits of hazardous waste minimization including cost savings opportunities in the form of avoided disposal costs and the creation of safer working and learning conditions for its employees and clients.

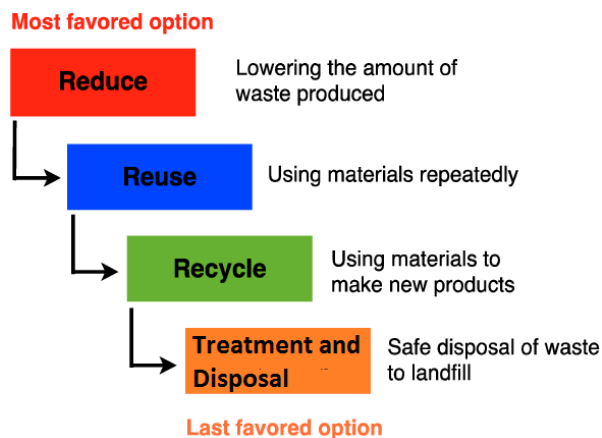
### 2. Roles and responsibilities

All Triumvirate personnel are responsible for identifying hazardous waste and adhering to the Hazardous Waste Facility Permit (26196-009-HO).

The Environmental, Transportation, Safety and Compliance Specialist is responsible for assisting the facility with regulatory compliance, and safety and training of personnel at the facility.

### 3. Waste Minimization Plan

All Triumvirate personnel should make waste minimization an active and ongoing component of their operations. Waste minimization is a waste management approach that focuses on reducing the amount and toxicity of waste that is generated. The waste management hierarchy (below) illustrates hazardous waste management methods in order of preference when waste minimization is a priority.



#### 3.1 Reduce

Reduce – Changing practices and processes in order to reduce or eliminate the generation of hazardous waste – is the most preferable option in the waste management hierarchy. Source reduction can be accomplished through:

- Effective purchasing
- Chemical substitution
- Good housekeeping
- Conducting experiments and sampling at the microscale.

### 3.2 Reuse and Recycling

When source reduction is not possible, the next best way to minimize the production of hazardous wastes is through reuse and recycling. Reuse and recycling can be using a waste material for another purpose.

### 3.3 Treatment and Disposal

Some wastes can be treated to render them non-hazardous or less hazardous. When possible, Triumvirate will neutralize or detoxify a chemical prior to disposal.

In the event that hazardous waste generation is unavoidable Triumvirate will comply with strict waste disposal procedures in order to prevent injury, minimize environmental health hazards and meet regulatory requirements.