



Hazardous Materials and Waste Management Plan

Symmetric Program Management LLC

SPM 06 | Version 1.0 | Prepared October 11 2026

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Approval signature: *Thomas Jackson* Effective date: October 11, 2026

Purpose and boundaries

SPM will control hazardous materials and waste associated with company operations and subcontracted technical work. Routine office work and technical field work require different controls. This plan does not authorize hazardous waste treatment, transport, emergency response, or chemical handling by unqualified personnel. Project-specific requirements must be established before materials arrive or work begins.

Responsibilities

The CEO owns environmental oversight. The project manager coordinates the client and subcontractor arrangements, verifies required credentials, and retains evidence. A qualified environmental or safety specialist evaluates hazardous tasks and waste classification. The entity legally responsible as generator retains its duties; a purchase order or subcontract alone cannot transfer statutory responsibility.

Pework determination

Identify anticipated chemicals, refrigerants, oils, batteries, electronics, contaminated materials, and cleaning products. Confirm who purchases, uses, stores, generates, signs shipping documents, and arranges disposal. Identify site and jurisdiction requirements, applicable generator category, permits or identification numbers, training, emergency arrangements, and authorized receiving facilities. Do not assume SPM has a particular generator category.

Inventory and hazard communication

Maintain a chemical inventory with product name, hazard, quantity, location, owner, and current safety data sheet. Provide accessible safety data sheets and a hazard communication briefing before exposure. Keep original labels and label workplace containers as required. Do not use unknown products or transfer chemicals into food or drink containers. Inventory changes require review.

Storage and use

Use compatible, closed, sound containers and separate incompatible substances. Provide suitable secondary containment where necessary, secure the area, and keep ignition sources and drains protected. Follow safety data sheet instructions, site rules, and task-specific controls. Inspect storage weekly during active work as an internal minimum; apply any stricter required cadence. Record leaks, corrosion, missing labels, and corrective action.

Waste determination and segregation

Determine whether each waste is regulated at the point of generation using process knowledge and testing when necessary. Evaluate applicable hazardous waste listings and characteristics, universal waste, used oil, and other special streams. Do not rely on a safety data sheet alone to classify waste. Record the basis. Keep streams segregated; never mix or dilute waste to evade requirements.

Accumulation and labeling

Establish applicable accumulation rules for the site and generator category before storing waste. Mark containers, dates, contents, hazards, and status as required. Keep containers closed except for permitted additions or removal and track quantities and deadlines. Arrange pickup early enough to avoid limits. State rules may be more stringent than federal rules; use qualified review for acute waste and unusual streams.

Transport and disposal

Use authorized transporters and receiving facilities and verify their authority for the waste type. Only trained and authorized persons prepare and sign required manifests or shipping papers. Keep chain-of-custody, weights, manifests, receipts, and final disposition evidence; follow up on missing returns. Do not export waste or ship regulated material through ordinary mail without the required approvals and procedures.

Refrigerants and equipment

Technical subcontractors must verify technician credentials, equipment, and refrigerant requirements applicable to the task. Recover refrigerant as required and prohibit unlawful venting. Record equipment, refrigerant type, quantity recovered or added, technician, destination, and service date. Evaluate oils, contaminated components, and demolition debris separately; do not assume they are ordinary trash.

Spill and exposure response

Stop work, warn others, isolate the area, and call emergency services for immediate danger. Do not enter contaminated areas or attempt cleanup without training, protective equipment, and authorization. A trained person may manage a small incidental release only within established capabilities. Notify the client and CEO immediately. Qualified personnel determine authority notices, cleanup method, disposal, and safe reentry; do not delay mandatory reporting.

Required project register

Item	Required evidence
Material inventory	Product; quantity; location; safety data sheet; responsible employer
Waste determination	Stream; origin; classification basis; jurisdiction; reviewer
Accumulation log	Container; quantity; dates; inspections; pickup deadline
Vendor verification	Transporter and facility authority; waste acceptance; expiry
Disposal record	Manifest or receipt; quantity; date; destination; final disposition
Incident record	Release facts; exposure; notifications; cleanup; corrective action

Training and review

Complete role-specific training before assignment and refresh it at the applicable interval. Verify subcontractor plans before mobilization and disposal evidence before closeout. Retain records for their applicable statutory and contractual periods and legal holds. References: EPA generator categories, <https://www.epa.gov/hwgenerators/categories-hazardous-waste-generators>; refrigerant resources, <https://www.epa.gov/section608>.