

HAZARDOUS WASTE MANAGEMENT GUIDELINES FOR OFF-LOT PRODUCTIONS – U.S. ONLY

According to Federal, state, and local environmental regulations, some waste products generated by productions are considered hazardous waste. From prep through wrap and strike many productions may generate hazardous waste such as used paint, solvents, waste oil, etc. All productions that generate hazardous waste are responsible for establishing a hazardous waste program that complies with all applicable environmental regulations. Hazardous waste programs include determining which waste materials are hazardous, collection, labeling of waste streams, manifesting, transportation and disposal through reputable vendors, and recordkeeping.


To assist productions with program set-up and hazardous waste disposal, Warner Bros., Safety & Environmental Affairs (WB S&EA) has partnered with Clean Harbors Environmental Services (Clean Harbors) and Veolia North America, LLC (Veolia), two qualified and certified hazardous waste contractors with locations in all 50 states. The following guidelines are intended to assist productions, make hazardous waste program set-up and execution, a simple process for productions, and to ensure that all hazardous waste collection and disposal are completed with the required documentation, tracking and records.

1. Setting up a Hazardous Waste Program at Your Location

Early Prep

At least **60 days** before waste removal services are needed, contact your WB Environmental Affairs Representative (primary contact) and your WB Production Safety Representative to begin program setup:

a) WB Environmental Affairs Representative
Anuya Dickinson, Manager, Environmental Affairs

 (747) 367-2920

 Anuya.dickinson@wbd.com

b) WB Production Safety Representative assigned to your production:

- Bryan Schafer Bryan.schafer@wbd.com
- Richard Levin Richard.Levin@wbd.com
- Ian Bass-Galespie Ian.Bass-Galespie@wbd.com
- Aneet Bains Aneet.bains@wbd.com
- Steve Kvalheim Steve.kvalheim@wbd.com
- Shane Rogers Shane.rogers@wbd.com

Additionally, review the Hazardous Waste Awareness Toolbox Talk included as Attachment A to ensure familiarity with basic hazardous waste requirements.

If Production chooses to use—or already has in place—its own hazardous waste vendor or program, the WB Production and Environmental Affairs Representatives must both still be involved. Copies of all hazardous waste manifests and the EPA ID number associated with the facility must be provided to both parties.

2. Obtaining an EPA ID for Your Site

Every production location that generates hazardous waste must have its own EPA Identification Number. EPA ID numbers are site-specific; they remain associated with the location even if the business owner or production processes change.

Short-term productions:

Productions where hazardous waste generation begins and ends within 90 days or less are considered short-term. A temporary (90-day) EPA Identification Number is required for these one-time or non-routine activities.

Long-term or recurring productions:

Productions where hazardous waste generation extends beyond 90 days, or where waste generation is expected to continue or recur over time, are considered long-term. A permanent EPA Identification Number is required.

Transition requirement:

If hazardous waste generation is expected to extend beyond the 90-day temporary EPA ID period, Production must notify WB Environmental Affairs and Production Safety Representatives so a permanent EPA ID can be obtained before the temporary EPA ID expires, to maintain compliance.

WB Environmental Affairs Representative will complete and submit the necessary forms and provide the EPA ID once assigned. Processing typically takes **up to 15 business days**.

Production will need to provide to WB Environmental Affairs Representative with the following information:

- a) Legal owner name, address, and contact information.
- b) Legal operator (production entity) name, address, and contact information.

3. Waste Storage and Vendor Account Setup + Supplies

Production must establish a covered hazardous waste storage area that complies with local fire code requirements. Confirm with the studio or property manager whether review or approval from the local Authority Having Jurisdiction (AHJ) is required. Post required signage indicating hazards present and stating that smoking is prohibited within 25 feet of the area.

WB has partnered with Veolia and Clean Harbors to support productions with waste pickup and disposal. Production must select one vendor and contact the Account Manager to set up an account. The vendor will request:

- I. Production Entity/Company Name
- II. Site Address
- III. Federal Employer ID Number (FEIN)
- IV. Site Contact
- V. Production Accounting Contact

VI. Services Agreement and supporting documents (W-9, credit sheet, etc.)

Vendors can also supply containers and secondary containment pallets for a fee (e.g., 55-gallon drums, secondary containment, waste labels).

Waste Vendor Options:

- **Clean Harbors***: Kristine Hanson | hanson.kristine@cleanharbors.com | Cell: 818-294-3378
- **Veolia**: Sandy Nunez | sandy.nunez@veolia.com | Cell: 626-594-2146

Always copy WB Environmental Affairs and WB Production Safety Representatives when contacting the vendor.

* Safety-Kleen is a subsidiary of Clean Harbors.

4. Waste Inventory Responsibilities

When is a product considered waste?

Materials remain products as long as they are usable and intended for continued use. Once a material is expired, contaminated, damaged, or no longer needed, and the generator decides it will be discarded — it becomes waste. At that moment, hazardous waste regulations apply and the 90-day accumulation period begins.

Production is responsible for providing accurate waste inventory information to the vendor so waste streams can be profiled. This includes the waste description, quantities, container sizes. Use the Waste Inventory Table in Attachment B (provided at the end of this document). Add additional rows if needed and submit the form to the vendor.

5. Establish Waste Stream Profiles

WB Environmental Affairs Representative will work with the production and vendor to establish profiles for all waste streams generated at your location. For any waste not listed in Attachment B, Production must submit a current Safety Data Sheets (SDS) to the waste vendor, WB Environmental Affairs and the Production Safety Representatives so that a waste stream profile can be created.

6. Waste Labeling and Removal

Hazardous waste must always be:

- Segregated (e.g., oxidizers are kept separate from flammables)
- Labeled
- Stored in appropriate covered containers

If additional storage supplies or services are needed, coordinate with the vendor.

Required label information:

- Accumulation start date
- Waste description (contents)
- EPA ID number
- Generator address and phone number

Example of a hazardous waste label:



Hazardous waste must be removed within 90 days of generation. Once the waste is ready for removal, Production submits a Bulk Pickup Service Request to the vendor. Pickup typically occurs within three weeks.

7. Hazardous Waste Manifest Handling, Documentation, and Recordkeeping

A hazardous waste manifest is required for all hazardous waste shipments. A trained waste vendor employee will sign the manifest as the production’s representative. WB Environmental Affairs Representative will preauthorize manifests with the vendor. Copies of all manifests will be submitted to the appropriate regulatory agencies as required for cradle-to-grave tracking. WB Environmental Affairs Representative will maintain all supporting documentation as part of the hazardous waste recordkeeping obligations.

Once the final hazardous waste pickup is completed, Production must notify WB Environmental Affairs and Production Safety Representatives, so the EPA ID number can be deactivated.

8. Spill Response

All chemical and oil spills must be cleaned up to protect workers, the public, and the environment. A basic spill kit with absorbents is recommended for all off-lot production locations. Prevent spills from entering waterways or storm drains at all times. If oil or chemicals reach a waterway or storm drain, immediately stop the source, contain the spill, and notify your Production Safety Representative. They will assess the situation and coordinate with WB Environmental Affairs Representative and the designated emergency spill response contractor to initiate cleanup services as needed. If the Production Safety Representative is unavailable, Production may contact the WB approved Spill Response Contractor directly via the 24-hour National Dispatch Centers (Veolia: (800) 688-4005; Clean Harbors: (800) 645-8265).

For additional guidance or clarification regarding these requirements, contact WB Environmental Affairs Representative and your Production Safety Representative.