

Operating & Closure Plans

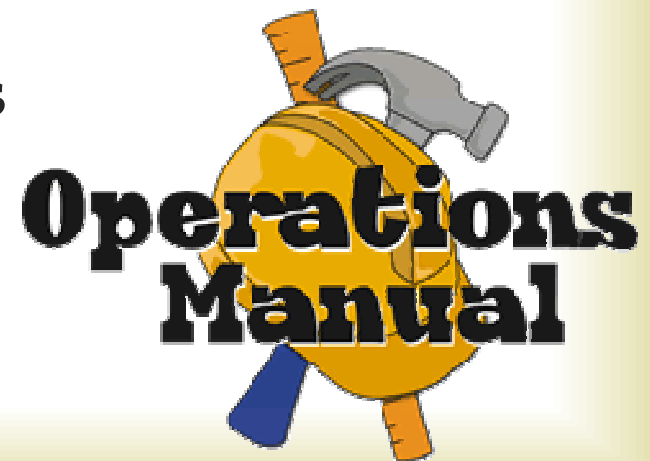


Just the Basics

What is an Operating Plan?



- ❧ Document written in plain language describing how to operate your facility on a day-to-day basis in compliance with:
 - ❧ The terms and conditions of your permit
 - ❧ The SW Rules (Env-Sw 100 – 2000)
 - ❧ The Law (RSA 149-M)
- ❧ “How to” Manual for all Employees



What is a Closure Plan?



- ❧ Document written in plain language describing how your facility will be closed in compliance with:
 - ❧ The terms and conditions of your permit
 - ❧ The SW Rules (Env-Sw 100 – 2000)
 - ❧ The Law (RSA 149-M)
- ❧ How to close a facility when operations are shut down for a period of time or indefinitely as opposed to closing for the day.



Who Needs O&C Plans?



- ☞ All permitted Solid Waste Facilities
- ☞ ALL permitted Solid Waste Facilities
- ☞ ALL PERMITTED SOLID WASTE FACILITIES!!!

**Trying to get the attention
of my students**



TeacherMemes.com

Operating Plans



Env-Sw 1105

Basic Format



- ❧ Prepared as a loose leaf document to facilitate changes
- ❧ Each page needs to have:
 - ❧ Page Number
 - ❧ Date created or revised
 - ❧ Facility Name
 - ❧ Facility Location
 - ❧ Permit #

Parts of an Operating Plan



- ❧ Section 1: Facility Identification
- ❧ Section 2: Authorized and Prohibited Waste
- ❧ Section 3: Routine Operations Plan
- ❧ Section 4: Residual Waste Management Plan
- ❧ Section 5: Facility Maintenance, Inspection, and Monitoring Plan
- ❧ Section 6: Contingency Plan
- ❧ Section 7: Employee Training Plan
- ❧ Section 8: Recordkeeping and Reporting



Facility Identification



This is a defined term in the Solid Waste Rules

- ❧ Facility name, mailing address, location by street and municipality, and permit number.
- ❧ Type of facility
- ❧ Capacity of the facility
- ❧ Facility service type
- ❧ Facility service area
- ❧ Name, address and telephone number of the permittee , property owner, and operator.

Authorized & Prohibited Wastes

- ❧ Specific types of wastes to be received.
- ❧ Specific types of waste to be prohibited.
 - ❧ Either by Statute or Rule or by facility owner



Routine Operations Plan



1. Hours of Operation
2. Facility access control and on-site traffic patterns
3. Waste acceptance and rejection procedures, including unloading, sorting and inspection.



BULKY ITEMS



Routine Operations Plan, cont.

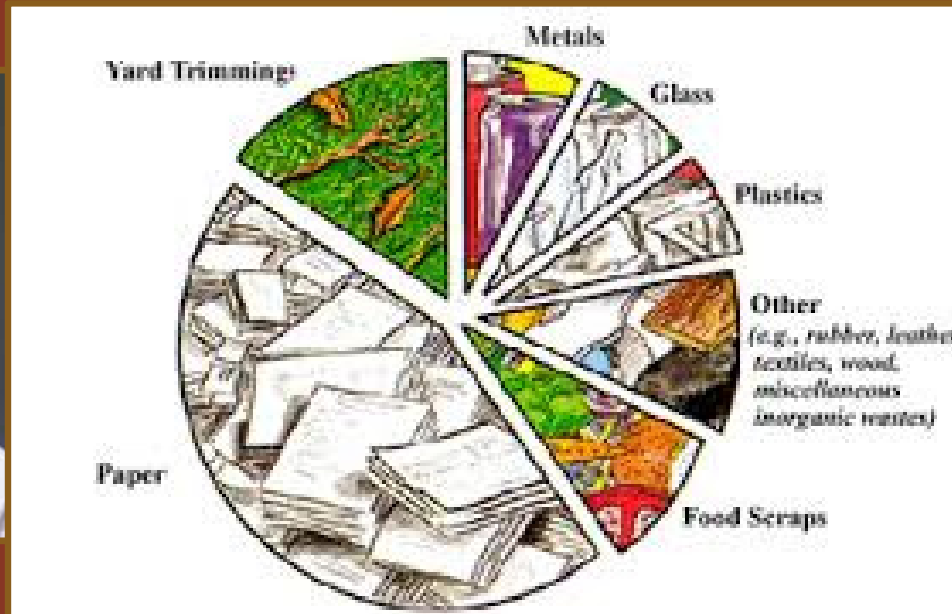


4. Procedure by which the quantity and source(s) of all waste received by the facility will be determined and recorded.
5. Procedure by which the quantity of destination of all outgoing waste and certified waste-derived products will be determined and recorded.
6. The storage time and capacity limits for all wastes received by the facility and the procedures by which the limits will be monitored to assure compliance.

Routine Operations Plan, cont.



7. All collection, storage, transfer, processing, treatment and disposal methods and procedures employed by the facility for managing waste following receipt.



Residual Waste Management Plan

Tara, this is great and all...but
what the heck is a residual
waste?

acceptable to the receiving

of

Maintenance, Inspection & Monitoring Plan

Identify all routine maintenance, inspection and monitoring requirements

- ☞ Spontaneous combustion
- ☞ Other fire hazards
- ☞ Vector production
- ☞ Generation of methane, hazardous and/or explosive gasses
- ☞ Odors
- ☞ Dust
- ☞ Windblown litter
- ☞ Leachate
- ☞ Spills
- ☞ Other potential or anticipated hazards or nuisances (aka everything else that could go wrong!)

Contingency Plan

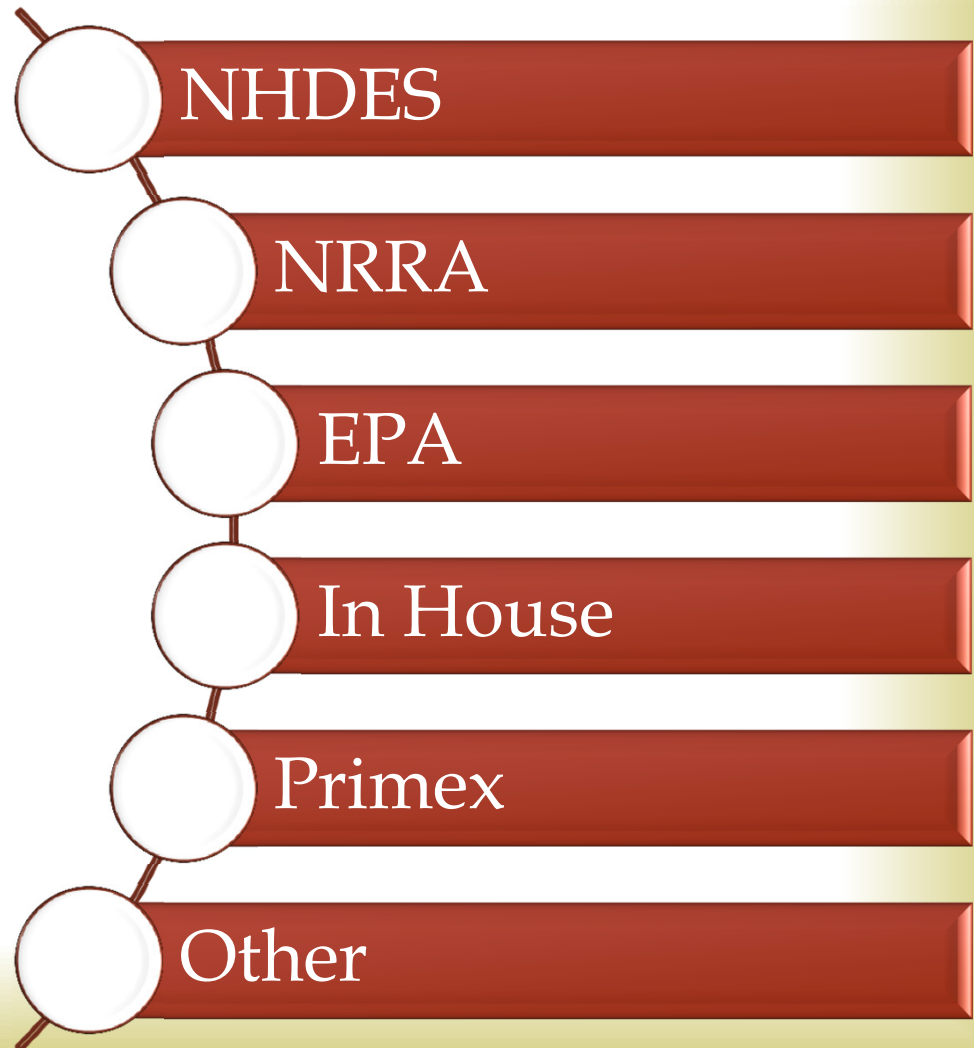


- ❧ Identify reasonably foreseeable emergencies, for example:
 - ❧ Fire
 - ❧ Explosion
 - ❧ Operator Injury
- ❧ Who is responsible for what?
- ❧ Identification of and telephone numbers of local and state officials.

Employee Training Plan



- What are you doing to train employees?
- What is the purpose of the training?
- How often is the training?



Recordkeeping & Reporting

Env-Sw 1105.06

- ❧ Records of all phases of operation
- ❧ Maintained at the facility
- ❧ Made available for inspectors
- ❧ When facility closes, maintained in approved location

Env-Sw 1105.07

- ❧ Required to notify dept when specific changes occur
- ❧ AFR on March 31
- ❧ Changes in control, as applicable
- ❧ Additional activities may need approval and additional studies

Closure Plans



Env-Sw 1106

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 - ❧ Facility Name
 - ❧ Facility Location
 - ❧ Permit #

Parts of a Closure Plan



- ❧ Section 1: Facility Identification
- ❧ Section 2: Closure Schedule
- ❧ Section 3: Waste Identification
- ❧ Section 4: Notifications
- ❧ Section 5: Closure Requirements
- ❧ Section 6: Post-Closure Requirements
- ❧ Section 7: Recordkeeping & Reporting
- ❧ Section 8: Other Permits
- ❧ Section 9: Closure Cost Estimate



Closure Process



- ❧ Prior to commencing closure activities, the permittee must notify NHDES in writing to include:
 - ❧ Facility Identification
 - ❧ Date the facility intends to stop receiving waste
 - ❧ Copy of the facility's Closure Plan
 - ❧ For non-PbN facilities, the one NHDES approved
 - ❧ For PbN facilities, the most up-to-date plan on file at facility
- ❧ For all facilities, update the plan as needed

When and Where?



When are Operating & Closure Plans Required?
Where are they required to be kept?

When are Plans Required?



- ☞ All permit-required SW facilities are required to prepare Operating and Closure Plans when first applying for a permit.
 - ☞ For non-PbN facilities, NHDES approves the plans.
 - ☞ For PbN facilities, NHDES does not approve the plans but you still need plans!
- ☞ Update the plans as necessary...review the plans at least annually.

Where to Store Plans?



Required by Rule

- ❧ MUST be stored at the facility
- ❧ MUST be made available to operators
- ❧ MUST be made available to NHDES inspectors upon request

Good Practice

- ❧ Have a Backup Copy!
 - ❧ At Town Hall (for municipalities)
 - ❧ Back-up on flashdrive/CD!



Preparation & Updates



How to Prepare & Update your Plans

- ☞ Use the BMP Checklists!!!
- ☞ You can do it yourself or hire a consultant
- ☞ Have your employees review the operating plan to make sure it follows their activities
- ☞ Remember, NHDES inspectors will ask to see these!





Who has homework???

Remember, use your resources!